

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

THE CONNECTICUT LIGHT AND POWER	:	DOCKET NO. 272
COMPANY AND THE UNITED	:	
ILLUMINATING COMPANY APPLICATION	:	
FOR A CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION OF A NEW 345-KV	:	
ELECTRIC TRANSMISSION LINE AND	:	
ASSOCIATED FACILITIES BETWEEN THE	:	
SCOVILLE ROCK SWITCHING STATION IN	:	
MIDDLETOWN AND THE NORWALK	:	
SUBSTATION IN NORWALK, INCLUDING	:	
THE RECONSTRUCTION OF PORTIONS	:	
OF EXISTING 115-KV AND 345 KV ELECTRIC	:	
TRANSMISSION LINES, THE CONSTRUCTION	:	
OF BESECK SWITCHING STATION IN	:	
WALLINGFORD, EAST DEVON SUBSTATION	:	
IN MILFORD, AND SINGER SUBSTATION IN	:	
BRIDGEPORT, MODIFICATIONS AT	:	
SCOVILLE ROCK SWITCHING STATION AND	:	
NORWALK SUBSTATION, AND THE	:	
RECONFIGURATION OF CERTAIN	:	
INTERCONNECTIONS	:	JULY 19, 2004

**RESPONSE OF PSEG POWER CONNECTICUT LLC (“PSEG CONNECTICUT”) TO
THE SITING COUNCIL’S REQUEST FOR COMMENTS REGARDING (1) NOTICE
TO MUNICIPALITIES, (2) THE DEFINITION OF “BUFFER ZONE”, AND (3)
PROPOSED ALTERNATIVE ROUTING**

The Siting Council has asked for comments from all parties and intervenors regarding three issues: (1) the effect, if any, upon the proceedings of a possible absence of notice, at the commencement of the action, to certain municipalities affected by proposed alternative routes;

(2) a definition of “buffer zone” for purposes of these proceedings; and (3) a suggestion of preferred routings, with reference to overhead and underground lines.

The primary interest of PSEG Connecticut in these proceedings relates to the location of the proposed Singer Substation in Bridgeport, Connecticut relative to its Bridgeport Harbor generation facilities; the effect of that location upon the power generation operations of PSEG Connecticut at the Bridgeport site; and the location and method of installation of cables which enter and egress from that location. The location of the Singer Substation Site, as proposed in the initial application, has since been revised to relocate the Substation from “Site 1” (as identified in the Singer Substation Site Selection Study, September 2003), to “Site 8” in that study, land owned, in part, by PSEG Connecticut at 182 Main Street, directly across the street from the initial site. Because PSEG’s interests related to the project relate primarily to that limited area, it does not have comments related to certain of the Council’s requests.

1. **Notice to Certain Municipalities** - The City of Bridgeport was given notice of this proceeding from its inception and has participated therein. Any municipalities which may not have received such notice are unrelated to the Singer Site. Therefore, PSEG Connecticut takes no position regarding whether there has been any defect in municipal notice in this matter and, if there were such defects, the effect thereof upon these proceedings.

2. **Preferred Routings** - PSEG owns and operates the Bridgeport Harbor Station, an electric generating facility that is critical to the overall bulk power supply in southwestern Connecticut. The proposed Singer Substation Site will be located on a portion of PSEG Connecticut’s generating station property in Bridgeport; thus its facilities are already adversely affected.

The “working group” is presently considering twelve study cases and will be reporting to the Council by August 16, 2004. PSEG Connecticut will withhold detailed comments until, like the Council, it has an opportunity to review that report. Under the present hearing schedule, discussion of at least one of those alternatives, “the railroad route”, which had been scheduled for a “wrap up day” on July 29, 2004, has been deferred to make that date available for other issues. PSEG anticipates presenting testimony at the rescheduled hearing related to the effect of the specific proposals made by the “working group”, including any proposed cable access to and from Singer and alternatives thereto upon Bridgeport Harbor Station operations.

However, in light of the Council’s request, some general comments are appropriate. The Applicants’ initial proposal provided that all entry and egress of cabling at the Singer Substation Site would be installed underground. At a hearing on April 21, 2004, at the request of the

Council, John Prete of United Illuminating, discussed a potential “railroad corridor” overhead route. In that presentation, Mr. Prete described a possible route for cable entry to the Singer Site which essentially bisects the Bridgeport Harbor Station property. Such a routing would be extremely detrimental to the operations of that Station. It is essential to PSEG Connecticut’s operations that cable providing access to Singer not run through any significant area of the Bridgeport Harbor Station. It would be even more detrimental to PSEG’s ability to operate, and update that facility if such cable were to run overhead.

In order to continue to produce the power required by its customers, PSEG Connecticut must be able to maintain all of its presently open areas for use, unfettered by constraints from overhead lines and associated easement. Fuel storage provides only one example of the adverse impact of such physical impediments. Bridgeport Harbor Station is a coal-burning plant. Therefore, it must maintain a significant coal pile, which varies in width and height based upon the season, product access, and other factors. An overhead line or any easement running through the facility would limit the size and location of that fuel storage.

In addition, under new environmental laws in Connecticut, PSEG Connecticut will be undertaking construction of a bag house and other facilities designed to effectuate further environmental improvements. An overhead line through the property would restrict the location of those facilities, would severely restrict the methods available for construction, and would greatly increase the cost of that facility. It could even preclude PSEG Connecticut’s ability to do those environmental upgrades if the overhead lines were placed incorrectly.

As set forth above, these comments are only intended to be general in nature. Upon receipt of a specific proposal from the working group with a specific route for any proposed line, PSEG can and will respond in greater detail, including a discussion of appropriate alternatives and the presentation of testimony.

3. **Definition of Buffer Zone** – As set forth above, the only property of PSEG Connecticut affected by the Project, is the area related to the Singer Substation. Accordingly, it takes no position as to the definition of an appropriate Buffer Zone for the Project at large. However, to the extent that overhead lines are permitted through the Bridgeport Harbor Station site, the adverse effects of such lines will be magnified by the existence of the buffer zone. Again, upon receipt from the working group of a more specific routing, PSEG will be able to comment in detail.

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