STATE OF CONNECTICUT
SITING COUNCIL

Re:	The Connecticut Light and Power 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 Scovill Rock Switching Station in Middletown and Norwalk Substation in Norwalk, Connecticut Including the Reconstruction of Portions of Existing 15-kV and 345-kV Electric Transmission Lines, the Construction of the Beseck Switching Station in Wallingford, East Devon Substation in Milford and Singer Substation in Bridgeport, Modifications at Scovill Rock Switching Station and Norwalk Substation and the Reconfiguration of Certain Interconnections	Docket 272

September 24, 2004

DIRECT TESTIMONY OF RICHARD MILLER
REGARDING THE EAST SHORE ROUTE CONCEPT

Q. Mr. Miller, please state your name, position, and business address.

A. My name is Richard H. Miller, and I am the Director of Engineering and Public Works for the City of New Haven. My office is located at 200 Orange Street, New Haven, CT. In that capacity, I have supervisory capacity over the City's Department of Engineering and the Department of Public Works. I also serve as the City Engineer and I am a member of the Port Authority and City Plan Commission. In these roles I have the responsibility to insure that the city infrastructure is maintained, that private and public improvements are built consistent with good engineering standards, that the Rights of Way (ROW), used for pubic purposes, are preserved in accordance with city ordinances and State laws.

Q. Are you familiar with the term "East Shore Alternative Route"?

A. I understand that during the municipal consultation process, neighboring towns along the route of the proposed transmission line requested that the Companies provide them with information and studies modeling various options involving a route connecting Beseck

Switching Station in Wallingford to a termination facility adjacent to the existing East Shore Substation in New Haven, and ending at the East Devon Substation in Milford.

Q. Have the Companies reviewed the East Shore alternative route with City officials?

A. To the best of my knowledge, the Application before the Council in Docket 272 does not contain an East Shore alternative route. On June 11, 2004, the Companies met briefly with City officials and provided them with summary information regarding the concept of constructing a transmission facility through New Haven. The Companies also provided us with a document marked in this docket as Exhibit ___. That document did not discuss a specific route from the East Shore substation through New Haven.

Following that meeting, I met with engineers from the Companies to discuss whether there might be a technically viable route from Waterfront Street to the West Haven border that would involve New Haven city streets.

Q. Were you able to identify any technically viable routes?

A. No. As I understand it, an East Shore alternative route could require construction of as much as 13 miles of three sets of underground 345-kV cables, with vaults every 300-400 feet. This translates into a 7-12-foot vertical profile, five feet deep under city streets. In addition to consuming a large percentage of the existing, limited right of way under the streets, burial of the three cables at this level places them in direct conflict with the City's sewer, water and other utilities (such as gas, telephone, and fiberoptic cable), and buried street connections. Most of the sewers and waterlines are very old and are made of brick (sewer) or cast iron (water). They are sensitive to any underground construction and easily damaged. The result could be disastrous to the roads and on customers that depend on these services.

Compounding the infrastructure problems associated with underground construction, New Haven's topography is not friendly: the substrata consists of coarse sand laden with water, or solid rock. Special construction methods are often necessary to overcome these natural site conditions.

Getting across the New Haven Harbor alone constitutes an insurmountable problem. Submarine construction options would create problems for New Haven's oyster and clam

industry, and interfere with Port activities. A harbor route is also inconsistent with Federal and State regulations, including the continuing moratorium on construction within Long Island Sound. In fact, all options for traversing the harbor involve a water crossing; there is no fixed bridge over the Quinnipiac River until Foxon Boulevard, several miles north of the East Shore substation. Crossing through the city with transmission lines must overcome rivers, major railroads, and major highways. It is difficult to comprehend the issues each crossing must face and how it would affect continuous transportation, the environment, and the adjacent businesses or property owners.

Q: Has the Engineering Department considered other effects, if any, that installation of three sets of 345-kV cables might have on the City?

A: Yes. The alternate route would greatly disrupt public facilities, streets and neighborhoods, result in lengthy construction times, and produce higher maintenance costs for the City and other utilities. There is also the "spaghetti effect" to consider, where utilities are packed so tightly together in a limited ROW it is impossible to identify the various lines when repairs are needed. This creates excavation dangers when sanitary sewers, water, gas, storm sewers, cable TV, telephone, and other buried electrical services crisscross the road.

The construction phase alone would cause considerable disruption to pedestrian and vehicular traffic flow in the dense residential areas and heavily-used parklands comprising the route. The City has been given no timetable for such a project, but estimates for the Cross Sound cable overland route were calculated to take as much as 16 months or more to complete. That timetable assumes that no unusual weather or other conditions will interfere. The City will require curb-to-curb re-pavement of roads, causing additional disruption.

Q. Please discuss the effects, if any, on future public needs due to this project's occupation of limited right of way under City streets?

A. The ROW in most of the city is only 50-feet wide. Underground utilities are assigned in these areas to support adjacent property owners and businesses. On almost all city streets there is little or no shelf or excess private land that could be used for additional underground facilities. All the utilities must then use this limited space. Sewer and water lines must be separated by at least three feet. Gas lines run along the shoulder of the road and storm

systems weave in most of the space that is left. When electrical services, cable TV, telephone lines are buried, as they are in most of the downtown area, there is little room for anything else. For the planners and designers involved with any of these facilities it becomes a significant task to change or modify utility lines.

Q: Are any permits necessary from City Departments?

A: Yes. Use of municipal streets and parkways for cable installation would require special right-of-way permits from the Department of Public Works with signoffs from Traffic and Parking, and City Plan.

Q: Have the Companies sought any such approvals?

A: No.

Q. Did the City have any previous notice that an East Shore option was under consideration as a possible route?

A. No. In the summer of 2003, New Haven received a copy of the Companies' Municipal Consultation filing, dated May 2003, in which the Companies proposed to construct and operate a new 345-kV transmission line and associated facilities between Middletown and Norwalk, Connecticut ("Middletown to Norwalk Project" or "Project"), so as to meet the demand for reliable electric service in southwest Connecticut. The Municipal Consult filing contained detailed technical reports and information concerning the need, site selection, and potential environmental effects of the Project, as well as an evaluation of alternative routes and transmission configurations.

Neither the primary route under consideration, nor the alternative routes discussed in the documentation, called for the installation of new transmission lines or facilities within New Haven. Because the Project did not directly affect New Haven, the City did not hold hearings nor did it seek to schedule a public "open house" with the Companies during the Municipal Consultation period.

Q. Does this conclude your testimony?

A. Yes.