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July 19, 2004

## VIA HAND-DELIVERY

Ms. Pamela Katz Chairman Connecticut Siting Council 10 Franklin Square New Britain, CT 06501

Re: Docket No. 272

Dear Chairman Katz:

In its notice dated June 4, 2004, the Siting Council requested that all parties and intervenors submit comments and details relative to the following:

- 1. A preferred overhead route through the municipality(ies), including limits to pole heights, conductor configuration (horizontal, vertical, split-phase), and suggested shifts in route;
- 2. A preferred underground route through the municipality(ies), identifying street routes; and
- 3. A preferred overhead/underground route through the municipality(ies), identifying segment locations and transition stations (site requires four to eight acres).

The Connecticut Light and Power Company and The United Illuminating Company (collectively, "the Companies") respond to this request as follows:

<u>Preferred Overhead Route:</u> The Companies' preferred overhead route in segments 1 and 2 is the route and configuration described in the Application, assuming that the ongoing studies by the Reliability and Operability Committee ultimately determine that this route can be designed in such a manner as to be acceptable to ISO-NE for purposes of the section 18.4 approval process. The Companies would consider the use of split-phasing, route shifts (such as the Durham bypass discussed earlier in this docket), and other EMF mitigation techniques along this portion of the proposed route.

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<u>Preferred Underground Route:</u> The Companies have not proposed – nor do they support - any "all underground" route because, as discussed in their response to CSC-01, Q-CSC-028 and in prior hearings in this docket, no all underground configuration satisfies the parameters established for this project, particularly the parameter of operability/reliability. However, the Companies did identify an underground route in segments 1 and 2 that they consider to be topographically and environmentally best suited for underground construction. This route is described in the Companies' response to CSC-01, Q-CSC-028 and is shown on the maps enclosed in the back of Volume I of the Application.

Preferred Overhead/Underground Route: This request appears to be primarily directed not to the Companies, but rather to the municipalities between Middletown and Milford, because it seeks input on the *portion* of each municipality where undergrounding is preferred if undergrounding is not feasible for the entire town. Given that the Reliability and Operability Committee has not yet found a configuration that satisfies ISO-NE's concerns regarding the reliability of underground 345-kV facilities for the 24 miles of the proposed route between East Devon Substation and Norwalk Substation, the Companies cannot support any additional undergrounding beyond the 24 miles. To the extent this request is designed to solicit the Companies' input on where the optimal use of underground 345-kV facilities would be for this Project as a whole, the Companies' continue to support the use of undergrounding between East Devon, Singer, and Norwalk Substations for the reasons stated in the Application. (See Volume I of the Application, pages H-26 to H-42.)

Very truly yours,

Brian T. Henebry

BTH/da

cc: Service List