

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL
TEN FRANKLIN SQUARE, NEW BRITAIN, CT 06051-2644
PHONE: (860) 827-2900 --- FAX: (860) 827-2929

RECEIVED
JUN 30 2004
CONNECTICUT
SITING COUNCIL

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

RE: JOINT APPLICATION OF THE : DOCKET NO. 272
CONNECTICUT LIGHT AND POWER :
COMPANY AND THE UNITED :
ILLUMINATING COMPANY FOR A :
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
A 345-KV ELECTRIC TRANSMISSION LINE :
FACILITY AND ASSOCIATED FACILITIES :
BETWEEN SCOVILL ROCK SWITCHING :
STATION IN MIDDLETOWN AND :
NORWALK SUBSTATION IN NORWALK : JUNE 30, 2004

**OFFICE OF CONSUMER COUNSEL'S
SECOND SET OF INTERROGATORIES**

The Office of Consumer Counsel ("OCC") requests that the Applicants respond to the attached interrogatories by **July 14, 2004**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned as soon as possible.

OCC-8 The following questions (i.e., OCC-9 through OCC-14, inclusive) request specific information on the relative costs expected for the proposed transmission project on an overhead or an underground basis. In all instances, insofar as possible, please present both a construction cost estimate and a life cycle cost estimate (i.e., including repair and maintenance following initial construction). Finally, please treat this question (i.e., OCC-8) as a request to provide any further information (beyond that specifically requested in the questions below) that the Applicants believe would illuminate the subject under inquiry.

- OCC-9 The Application, at p. I-4 through I-6, estimates the initial capital cost of the proposed facility (with supported changes) as \$603.6 Million, and the life cycle cost as \$824.1 Million (2003 dollars).
(a) Is these estimates still accurate? If not, please provide an update.
(b) Please state the estimated allocation of the \$603.6 Million and the 824.1 Million amounts (or of any updated amounts) among Segments 1 through 4, inclusive.
- OCC-10 The Applicants' proposed route (with supported changes) contains approximately 45 miles of overhead construction and 24 miles of underground construction.
(a) Please state the allocation of this route's estimated capital cost of \$603.6 Million, and its estimated life cycle cost of \$824.1 Million [or of any updated amounts] between overhead and underground sections.
(b) What would be the estimated costs (initial capital & life cycle) of this same route constructed entirely on an overhead basis?
- OCC-11 Alternative A contains approximately 60 miles of overhead construction and 13 miles of underground construction.
(a) According to p. I-29 through I-31 of the Application, Alternative A's estimated capital cost is \$620 Million, and its estimated life cycle cost is \$804.6 Million. Please state the allocation of these dollar amounts between overhead and underground sections.
(b) What would be the estimated costs (initial capital & life cycle) of this same route constructed entirely on an overhead basis?
- OCC-12 Alternative B contains approximately 72 miles of overhead construction and 2 miles of underground construction.
(c) According to p. I-42 through I-44 of the Application, Alternative B's estimated capital cost is \$601.8 Million, and its estimated life cycle cost is \$804.3 Million. Please state the allocation of these dollar amounts between overhead and underground sections.
(a) What would be the estimated costs (initial capital & life cycle) of this same route constructed entirely on an overhead basis?

OCC-13 Please refer to the so-called "East Shore Alternative," defined for purposes of this question to include: (i) a new 345-kV line from Beseck Switching Station to East Shore Station and (ii) a line from East Shore to East Devon, either (a) all underground or (b) underground from East Shore to a transition station in Orange, and overhead from there to East Devon.

- (a) Please estimate the costs (both construction and life cycle, if possible) of both such East Shore route variations (i.e., all underground versus partly underground, between East Shore and East Devon), assuming that it is technically feasible to construct these route variations just as proponents have requested. Also, please state what portion of this cost estimate is the incremental cost over and above the estimated cost to construct the comparable portion of the transmission facility as the Applicants have proposed (with supported changes). Please provide all specific detail necessary to support the summary dollar cost figures presented.
- (b) Respecting both types of cost estimates given in subpart (a) of this question [that is, overall costs and incremental costs], please state with respect to each separate route variation identified there whether the Applicants expect that those costs will be determined under NEPOOL rules and procedures to be eligible for regional (i.e., New England-wide) cost support, or will be viewed as localized costs (i.e., not eligible for regional support).

OCC-14 Please refer to any town specific route variations that have been proposed to the Applicants, or submitted to the Applicants for consideration [other than company supported route changes identified in the municipal consultation process] that are in whole or in part underground, and which have been identified in sufficient detail to enable their cost to be estimated. Give the geographic location of each such variation, describe its linear length and other major components, and identify the proponent of the variation.

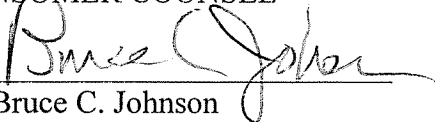
- (a) Please estimate the costs (both construction and life cycle, if possible) of each such route variation, assuming that it is technically feasible to construct the variation just as its proponent has requested. Also, please state what portion of this cost estimate is the incremental cost over and above the estimated cost to construct the comparable portion of the transmission facility as the Applicants have proposed (with supported changes). Please provide all specific detail necessary to support the summary dollar cost figures presented.
- (b) Respecting both types of cost estimates given in subpart (a) of this question [that is, overall costs and incremental costs], please state with

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL
TEN FRANKLIN SQUARE, NEW BRITAIN, CT 06051-2644
PHONE: (860) 827-2900 --- FAX: (860) 827-2929

respect to each separate route variation identified there whether the Applicants expect that those costs will be determined under NEPOOL rules and procedures to be eligible for regional (i.e., New England-wide) cost support, or will be viewed as localized costs (i.e., not eligible for regional support).

Respectfully submitted,

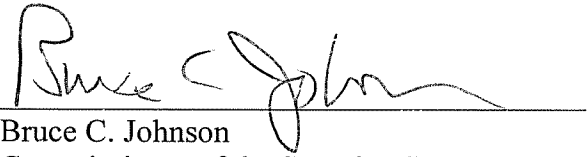
MARY J. HEALEY
CONSUMER COUNSEL

By: 
Bruce C. Johnson
Litigation Attorney

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL
TEN FRANKLIN SQUARE, NEW BRITAIN, CT 06051-2644
PHONE: (860) 827-2900 --- FAX: (860) 827-2929

CERTIFICATION

I hereby certify that a copy of the foregoing has been mailed and/or hand-delivered to all parties and intervenors of record this 30th day of June 2004.



Bruce C. Johnson
Commissioner of the Superior Court