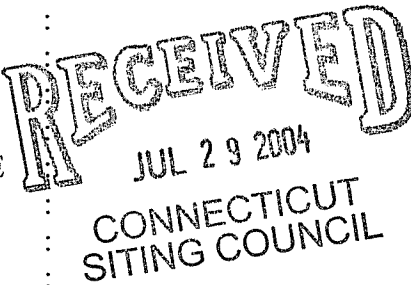


STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL
TEN FRANKLIN SQUARE, NEW BRITAIN, CT 06051-2644
PHONE: (860) 827-2900 --- FAX: (860) 827-2929

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 : JULY 29, 2004



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

The Office of Consumer Counsel ("OCC") requests that the **specific docket participants identified at the start of each question listed below** respond to the attached interrogatories by **August 12, 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-15 (This question is directed to the **Town of Woodbridge**.) Refer to the Applicants' response to OCC-14, as filed in this docket on July 28, 2004. According to that response, the Town of Woodbridge has advocated a particular variant route/configuration for the proposed transmission facility, a configuration for which the estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost would be \$132,229,000, and the estimated incremental lifetime cost would be \$189,025,000. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Does the Applicants' response accurately describe the variant route/configuration in question?
- (b) Does Woodbridge advocate Siting Council acceptance/certification of this variant route/configuration? If so, on what basis does it do so? Please explain your answer in specific detail, particularly in light of the extra costs expected on that account. What considerations would justify those extra costs?
- (c) Does Woodbridge contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Woodbridge or any electric customers not residing in Woodbridge? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Woodbridge believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Woodbridge believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Woodbridge believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control ("DPUC") will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Woodbridge expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Woodbridge? Residents of Woodbridge? Some other

group of electric customers? Please explain the basis for your answer in specific detail.

- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Woodbridge agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Woodbridge or residents of Woodbridge, how would Woodbridge suggest that the amounts in question be collected?
- (j) Would Woodbridge continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Woodbridge's sole responsibility?

OCC-16

(This question is directed to the **City of Milford**.) Refer to the Applicants' response to OCC-14, as filed in this docket on July 28, 2004. According to that response, the City of Milford has advocated a particular variant route/configuration for the proposed transmission facility, a configuration for which the estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost would be \$67,357,000, and the estimated incremental lifetime cost would be \$96,116,000. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Does the Applicants' response accurately describe the variant route/configuration in question?
- (b) Does Milford advocate Siting Council acceptance/certification of this variant route/configuration? If so, on what basis does it do so? Please explain your answer in specific detail, particularly in light of the extra costs expected on that account. What considerations would justify those extra costs?
- (c) Does Milford contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Milford or any electric customers not residing in Milford? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Milford believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.

- (e) Does Milford believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Milford believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Milford expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The City of Milford? Residents of Milford? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC’s decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Milford agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes the entire costs and/or incremental costs associated with this variant route/configuration on the City of Milford or the residents of Milford, how would Milford suggest that the amounts in question be collected?
- (j) Would Milford continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Milford’s sole responsibility?

OCC-17

(This question is directed to the City of Orange.) Refer to the Applicants' response to OCC-13, as filed in this docket on July 28, 2004. According to that response, the East Shore Alternative (all underground configuration) would have an estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost of \$205,154,000, and an estimated incremental lifetime cost of \$244,000,000. Also according to that response, the East Shore Alternative (partial underground configuration) would have an estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost of \$138,832,000, and an estimated incremental lifetime cost of \$148,000,000. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Which version of the East Shore Alternative discussed by the Applicants in OCC-13 most closely resembles the East Shore Alternative that Orange favored in its 7/19/04 comments filed with the Siting Council?
- (b) On what basis does Orange advocate Siting Council acceptance of this variant route/configuration? Please explain your answer in specific detail, particularly in light of the extra costs expected on that account. What considerations would justify those extra costs?
- (c) Does Orange contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Orange or any electric customers not residing in Orange? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Orange believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Orange believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Orange believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control ("DPUC") will

determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Orange expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?

- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The City of Orange? Residents of Orange? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Orange agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the City of Orange or the residents of Orange, how would Orange suggest that the amounts in question be collected?
- (j) Would Orange continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Orange's sole responsibility?

OCC-18

(This question is directed to the City of Cheshire.) Refer to the Applicants' response to OCC-13, as filed in this docket on July 28, 2004. According to that response, the East Shore Alternative (all underground configuration) would have an estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost of \$205,154,000, and an estimated incremental lifetime cost of \$244,000,000. Also according to that response, the East Shore Alternative (partial underground configuration) would have an estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost of \$138,832,000, and an estimated incremental lifetime cost of \$148,000,000. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Which version of the East Shore Alternative discussed by the Applicants in OCC-13 most closely resembles the East Shore Alternative that Cheshire favored in its 7/19/04 comments filed with the Siting Council?
- (b) On what basis does Cheshire advocate Siting Council acceptance of this variant route/configuration? Please explain your answer in specific detail, particularly in light of the extra costs expected on that account. What considerations would justify those extra costs?
- (c) Does Cheshire contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Cheshire or any electric customers not residing in Cheshire? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Cheshire believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Cheshire believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Cheshire believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control ("DPUC") will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Cheshire expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The City of Cheshire? Residents of Cheshire? Some other group of

electric customers? Please explain the basis for your answer in specific detail.

- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Cheshire agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the City of Cheshire or the residents of Cheshire, how would Cheshire suggest that the amounts in question be collected?
- (j) Would Cheshire continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Cheshire's sole responsibility?

OCC-19

(This question is directed to the City of Wallingford.) Refer to the Applicants' response to OCC-13, as filed in this docket on July 28, 2004. According to that response, the East Shore Alternative (all underground configuration) would have an estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost of \$205,154,000, and an estimated incremental lifetime cost of \$244,000,000. Also according to that response, the East Shore Alternative (partial underground configuration) would have an estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost of \$138,832,000, and an estimated incremental lifetime cost of \$148,000,000. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Which version of the East Shore Alternative discussed by the Applicants in OCC-13 most closely resembles the East Shore Alternative that Wallingford favored in its 7/19/04 comments filed with the Siting Council?
- (b) On what basis does Wallingford advocate Siting Council acceptance of this variant route/configuration? Please explain your answer in specific detail, particularly in light of the extra costs expected on that account. What considerations would justify those extra costs?
- (c) Does Wallingford contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Wallingford or any electric customers not residing in Wallingford? If yes, please explain that benefit or those benefits in specific detail.

- (d) Does Wallingford believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Wallingford believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Wallingford believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control ("DPUC") will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Wallingford expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The City of Wallingford? Residents of Wallingford? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Wallingford agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the City of Wallingford or the residents of Wallingford, how would Wallingford suggest that the amounts in question be collected?
- (j) Would Wallingford continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of

the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Wallingford's sole responsibility?

OCC-20

(This question is directed to the City of Woodbridge.) Refer to the Applicants' response to OCC-13, as filed in this docket on July 28, 2004. According to that response, the East Shore Alternative (all underground configuration) would have an estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost of \$205,154,000, and an estimated incremental lifetime cost of \$244,000,000. Also according to that response, the East Shore Alternative (partial underground configuration) would have an estimated incremental (i.e., extra cost over that for the Applicants' own proposal) construction cost of \$138,832,000, and an estimated incremental lifetime cost of \$148,000,000. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Which version of the East Shore Alternative discussed by the Applicants in OCC-13 most closely resembles the East Shore Alternative that Woodbridge favored in its 7/19/04 comments filed with the Siting Council?
- (b) On what basis does Woodbridge advocate Siting Council acceptance of this variant route/configuration? Please explain your answer in specific detail, particularly in light of the extra costs expected on that account. What considerations would justify those extra costs?
- (c) Does Woodbridge contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Woodbridge or any electric customers not residing in Woodbridge? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Woodbridge believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Woodbridge believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Woodbridge believe that (i) the entire costs and/or (ii) the incremental costs associated with

this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?

- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Woodbridge expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The City of Woodbridge? Residents of Woodbridge? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC’s decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Woodbridge agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the City of Woodbridge or the residents of Woodbridge, how would Woodbridge suggest that the amounts in question be collected?
- (j) Would Woodbridge continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Woodbridge’s sole responsibility?

OCC-21

(This question is directed to the **Town of Middlefield.**) Refer to your comments on alternative transmission line routes, as filed in this docket on July 16, 2004. According to those comments, Middlefield advocates a particular variant route/configuration for the proposed transmission facility, described there as an entirely underground route, as agreed with Durham and Middletown. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
- (b) On what basis does Middlefield advocate Siting Council acceptance of this variant route/configuration?
- (c) Does Middlefield contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Middlefield or any electric customers not residing in Middlefield? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Middlefield believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Middlefield believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Middlefield believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Middlefield expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Middlefield? Residents of Middlefield? Some other group of electric customers? Please explain the basis for your answer in specific detail.

- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Middlefield agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Middlefield or residents of Middlefield, how would Middlefield suggest that the amounts in question be collected?
- (j) Would Middlefield continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Middlefield's sole responsibility?

OCC-22

(This question is directed to the **Town of Cheshire**.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 19, 2004. According to those comments, Cheshire advocates a particular variant route/configuration for the proposed transmission facility, described there as an underground construction in the Old Lane (Old Farm) neighborhood. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
- (b) On what basis does Cheshire advocate Siting Council acceptance of this variant route/configuration?
- (c) Does Cheshire contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Cheshire or any electric customers not residing in Cheshire? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Cheshire believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Cheshire believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act

Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Cheshire believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?

- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Cheshire expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Cheshire? Residents of Cheshire? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC’s decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Cheshire agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Cheshire or residents of Cheshire, how would Cheshire suggest that the amounts in question be collected?
- (j) Would Cheshire continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Cheshire’s sole responsibility?

OCC-23

(This question is directed to the **Town of Middlefield**.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 16, 2004. According to those comments, Middlefield advocates a particular variant route/configuration for the proposed transmission facility, described there as a partial underground route as agreed with

Durham and Middletown. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
- (b) On what basis does Middlefield advocate Siting Council acceptance of this variant route/configuration?
- (c) Does Middlefield contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Middlefield or any electric customers not residing in Middlefield? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Middlefield believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Middlefield believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Middlefield believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Middlefield expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Middlefield? Residents of Middlefield? Some other

group of electric customers? Please explain the basis for your answer in specific detail.

- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Middlefield agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Middlefield or residents of Middlefield, how would Middlefield suggest that the amounts in question be collected?
- (j) Would Middlefield continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Middlefield's sole responsibility?

OCC-24

(This question is directed to the **Town of Middletown**.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 16, 2004. According to those comments, Middletown advocates a particular variant route/configuration for the proposed transmission facility, described there as a partial underground route, as agreed with Durham and Middlefield. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (k) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
- (l) On what basis does Middletown advocate Siting Council acceptance of this variant route/configuration?
- (m) Does Middletown contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Middletown or any electric customers not residing in Middletown? If yes, please explain that benefit or those benefits in specific detail.
- (n) Does Middletown believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (o) Does Middletown believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the

- Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Middletown believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (p) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Middletown expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
 - (q) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Middletown? Residents of Middletown? Some other group of electric customers? Please explain the basis for your answer in specific detail.
 - (r) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC’s decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Middletown agree with this DPUC policy? Why or why not?
 - (s) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Middletown or residents of Middletown, how would Middletown suggest that the amounts in question be collected?
 - (t) Would Middletown continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Middletown’s sole responsibility?

OCC-25 (This question is directed to the **Town of Middletown**.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 16, 2004. According to those comments, Middletown advocates a particular variant route/configuration for the proposed transmission

facility, specifically an underground route described at pp. 4-5 of its Comments. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
- (b) On what basis does Middletown advocate Siting Council acceptance of this variant route/configuration?
- (c) Does Middletown contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Middletown or any electric customers not residing in Middletown? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Middletown believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Middletown believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Middletown believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Middletown expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI?

The Town of Middletown? Residents of Middletown? Some other group of electric customers? Please explain the basis for your answer in specific detail.

- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Middletown agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Middletown or residents of Middletown, how would Middletown suggest that the amounts in question be collected?
- (j) Would Middletown continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Middletown's sole responsibility?

OCC-26

(This question is directed to the Town of Durham.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 19, 2004. According to those comments, Durham advocates a particular variant route/configuration for the proposed transmission facility, described there as a partial underground route, as agreed with Middlefield and Middletown. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
- (b) On what basis does Durham advocate Siting Council acceptance of this variant route/configuration?
- (c) Does Durham contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Durham or any electric customers not residing in Durham? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Durham believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.

- (e) Does Durham believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Durham believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Durham expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Durham? Residents of Durham? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC’s decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Durham agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Durham or residents of Durham, how would Durham suggest that the amounts in question be collected?
- (j) Would Durham continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Durham’s sole responsibility?

OCC-27

- (This question is directed to the Town of Durham.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 19, 2004. According to those comments, Durham advocates a particular variant route/configuration for the proposed transmission facility, specifically, the Durham Underground Route mentioned at p. 3 of the Comments. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.
- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
 - (b) On what basis does Durham advocate Siting Council acceptance of this variant route/configuration?
 - (c) Does Durham contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Durham or any electric customers not residing in Durham? If yes, please explain that benefit or those benefits in specific detail.
 - (d) Does Durham believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
 - (e) Does Durham believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Durham believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
 - (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control ("DPUC") will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Durham expect to

take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?

- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Durham? Residents of Durham? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Durham agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Durham or residents of Durham, how would Durham suggest that the amounts in question be collected?
- (j) Would Durham continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Durham's sole responsibility?

OCC-28

(This question is directed to the **Town of Wallingford**.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 19, 2004. According to those comments, Wallingford advocates a particular variant route/configuration for the proposed transmission facility, described there as the preferred underground route previously supplied to CL&P. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
- (b) On what basis does Wallingford advocate Siting Council acceptance of this variant route/configuration?
- (c) Does Wallingford contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Wallingford or any electric customers not residing in Wallingford? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Wallingford believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.

- (e) Does Wallingford believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Wallingford believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Wallingford expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Wallingford? Residents of Wallingford? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC’s decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Wallingford agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Wallingford or residents of Wallingford, how would Wallingford suggest that the amounts in question be collected?
- (j) Would Wallingford continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant

route/configuration will be determined to be Wallingford's sole responsibility?

OCC-29

- (This question is directed to the **Town of Woodbridge**.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 19, 2004. According to those comments, Woodbridge advocates a particular variant route/configuration for the proposed transmission facility, described there as a part overhead/underground route, per Exhibit A (5/25/04 letter). In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.
- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
 - (b) On what basis does Woodbridge advocate Siting Council acceptance of this variant route/configuration?
 - (c) Does Woodbridge contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Woodbridge or any electric customers not residing in Woodbridge? If yes, please explain that benefit or those benefits in specific detail.
 - (d) Does Woodbridge believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
 - (e) Does Woodbridge believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Woodbridge believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
 - (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control ("DPUC") will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the

entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Woodbridge expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?

- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Woodbridge? Residents of Woodbridge? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Woodbridge agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Woodbridge or residents of Woodbridge, how would Woodbridge suggest that the amounts in question be collected?
- (j) Would Woodbridge continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Woodbridge's sole responsibility?

OCC-30

(This question is directed to the **Town of Orange**.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 19, 2004. According to those comments, Orange advocates a particular variant route/configuration for the proposed transmission facility, described there as a tri-town undergrounding solution with Milford and Woodbridge. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
- (b) On what basis does Orange advocate Siting Council acceptance of this variant route/configuration?
- (c) Does Orange contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Orange or

any electric customers not residing in Orange? If yes, please explain that benefit or those benefits in specific detail.

- (d) Does Orange believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Orange believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Orange believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control (“DPUC”) will determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Orange expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?
- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Orange? Residents of Orange? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC’s decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Orange agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Orange or residents of Orange, how would Orange suggest that the amounts in question be collected?

- (j) Would Orange continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Orange's sole responsibility?

OCC-31

(This question is directed to the **Town of Meriden**.) Refer to your comments on alternative transmission line routes, as filed in this docket on July 27, 2004. According to those comments, Meriden advocates a particular variant route/configuration for the proposed transmission facility, specifically, the solution proposed in the 8/13/03 memo attached to the Comments. In answering this question, please assume that it is technically feasible to construct this variant just as has been proposed.

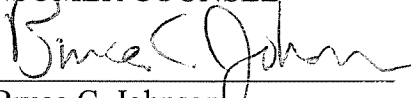
- (a) Is this variation an Applicant-supported route change identified in the municipal consultation process? If yes, please do not answer subparts (b) through (j) of this question. If no, please answer the remaining subparts of this question.
- (b) On what basis does Meriden advocate Siting Council acceptance of this variant route/configuration?
- (c) Does Meriden contend that this variant route/configuration, if approved and built, would benefit any part of Connecticut outside of Meriden or any electric customers not residing in Meriden? If yes, please explain that benefit or those benefits in specific detail.
- (d) Does Meriden believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration 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)? Please explain the basis for your answer in specific detail.
- (e) Does Meriden believe that Siting Council acceptance of this variant route/configuration (i.e., inclusion of it in the certification the Council eventually issues) would be a result of Public Act 04-246, An Act Concerning Electric Transmission Line Siting Criteria, within the meaning of Section 11 of that Public Act? Does Meriden believe that (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration would, if this proposal is certificated by the Siting Council, constitute prudent costs of a distribution company, within the meaning of Section 11 of that Public Act?
- (f) Assume for purposes of this subpart [and also the next 3 subparts] that the Connecticut Department of Public Utility Control ("DPUC") will

determine the inclusion in distribution company rates of any prudent costs arising under PA 04-246, § 11. Assume further that, if this variant route/configuration is certificated and constructed, the pertinent distribution company will ask the DPUC to include in its rates (i) the entire costs and/or (ii) the incremental costs associated with this variant route/configuration. In that event, would Meriden expect to take a position before DPUC regarding that rates request? If so, what would that position be? If not, why not?

- (g) On whom should the DPUC impose the entire costs and/or incremental costs associated with this variant route/configuration? All CL&P customers? All UI customers? All customers of both CL&P and UI? The Town of Meriden? Residents of Meriden? Some other group of electric customers? Please explain the basis for your answer in specific detail.
- (h) Refer to a recent DPUC statement of policy regarding costs of undergrounding, found at pp. 24-25 of the DPUC's decision of 12/17/03 in its Docket No. 03-07-02 (copy attached). Does Meriden agree with this DPUC policy? Why or why not?
- (i) If the DPUC imposes some portion of the entire costs and/or incremental costs associated with this variant route/configuration on the Town of Meriden or residents of Meriden, how would Meriden suggest that the amounts in question be collected?
- (j) Would Meriden continue to advocate Siting Council acceptance of this variant route/configuration if it was expected that some portion of the entire costs and/or incremental costs associated with this variant route/configuration will be determined to be Meriden's sole responsibility?

Respectfully submitted,

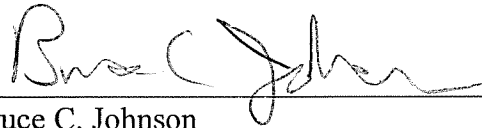
MARY J. HEALEY
CONSUMER COUNSEL

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 29th day of July 2004.

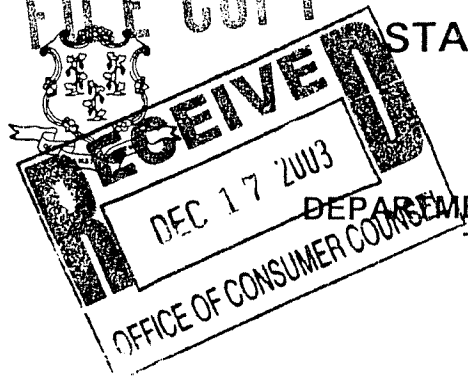


Bruce C. Johnson
Commissioner of the Superior Court

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STATE OF CONNECTICUT



DEPARTMENT OF PUBLIC UTILITY CONTROL
TEN FRANKLIN SQUARE
NEW BRITAIN, CT 06051

DOCKET NO. 03-07-02 APPLICATION OF THE CONNECTICUT LIGHT AND
POWER COMPANY TO AMEND ITS RATE SCHEDULES

December 17, 2003

By the following Commissioners:

Donald W. Downes
Jack R. Goldberg
John W. Betkoski, III
Linda J. Kelly
Anne C. George

DECISION

Interrogatory OCC-74 Bulk, p. 26. Despite such efforts, load growth, particularly growth due to increasing penetration of air conditioning load, continues as evidenced by continued upward revisions in peak load growth.

CL&P has spent approximately \$257 million on C&LM in its service territory from 2000 to year-end 2003, and will spend another \$156 million over the next four years. The Department agrees that C&LM should be used to reduce the need for distribution investments where cost effective. The Department has recognized the value of avoiding distribution expenditures and now includes a value for it in the cost/benefit analyses when evaluating C&LM programs. In addition, more emphasis has been placed on reducing peak consumption particularly by minimizing air conditioning loads.

The Department believes that supply and demand initiatives must be taken and that the current C&LM budgets and distribution plans as modified in this decision properly balance these objectives. The Department will continue to modify and improve the C&LM programs and will take action to shift consumption in this decision by modifying the Company's time-of-use rates.

4. Underground Facilities

The Woodlands Coalition for Responsible Energy, Inc. (Woodlands) states that the Company should place more of its overhead plant underground, since underground cable is more reliable than overhead as well as providing aesthetic benefits. Woodlands states that CL&P's policy is that an entity requesting facilities to be placed underground bears the full costs of doing so. Woodlands however believes that the costs should be borne by all ratepayers, particularly when the benefits of undergrounding, such as aesthetics, will be shared with the public. Therefore, Woodlands requests the Department to instruct CL&P to allocate a greater share of the cost of undergrounding to ratepayers. Further, Woodlands requests the Department to instruct CL&P to compile an inventory of priority areas for the installation of underground cable. Woodlands Brief, pp. 1-4.

CL&P states that its policy is to relocate facilities underground upon request, provided the project is feasible and that the person or entity making the request agrees to pay the full cost of replacing otherwise adequate overhead lines. According to the Company, this approach keeps its overall costs lower and keeps funds from being diverted from other improvements. CL&P Reply Brief, pp. 15-16.

The Department believes that the Company should construct its system using either overhead or underground facilities in a least cost manner to meet its reliability and safety requirements. Any person or entity that requests that overhead facilities be placed underground should bear the responsibility if there are incremental costs of doing so. In the case of replacing existing overhead lines with underground ones, this would mean that the requestor would bear the full cost of this work. The Department is mindful of concerns such as aesthetics; however, it is not in the position to judge what is aesthetically appealing to the majority of customers, nor of the willingness of ratepayers to pay for aesthetically appealing projects from which the vast majority of them will never benefit. In the case of reliability benefits, those will often accrue primarily to the requestor. It is not fair or reasonable that ratepayers should be expected to bear the

cost of essentially a premium-level service that would benefit relatively few. Accordingly, especially in the cases of an individual requesting his service to be undergrounded and in the case of a municipality requesting a primary or transmission line to be placed underground, the Department believes the requestor should bear the incremental cost. The Department concurs with CL&P's policy regarding cost assignment for underground facilities.

Prosecutorial states that more distribution facilities should be placed underground, to decrease the magnitude of the effect of storms on reliability and to decrease the cost of overhead line maintenance. Prosecutorial further recommends certain overhead distribution facilities near New Britain General Hospital be relocated underground. Prosecutorial Written Exceptions, pp. 4-6.

The Department believes that the Company should take a least cost approach when choosing between underground or overhead facilities, including reliability considerations and total cost over the life of the facilities. There are times when placing facilities underground makes sense, particularly in congested urban areas. However, when overhead facilities can reasonably be placed in an area, the economics usually dictate that this is the reasonable course of action. Underground facilities are typically much more costly than overhead facilities, considering all lifecycle costs such as maintenance. This is the reason the Department has a standing policy that the incremental cost of undergrounding be borne by the requestor. It is inappropriate that any such cost be socialized. The Department is not "discouraging" underground facilities, as Prosecutorial implies; however, it does not believe that the cost of such facilities should be paid by ratepayers who gain no benefit. If Prosecutorial's recommendations to require the Company to bear the cost of more widespread underground facilities were implemented where it is not cost-effective, the result would be higher electric rates at a time when many other factors already are forcing rates higher, and it is therefore inappropriate.

Prosecutorial also recommends that certain facilities near New Britain General Hospital be placed underground. This is a specific personal recommendation that is not appropriate within the context of a rate proceeding.

5. Northwest Connecticut

The Department received a letter dated December 1, 2003 from State Representative George Wilber. Representative Wilber cites a number of concerns with service in northwest Connecticut, and requests lower rates to customers in that area. The Department notes that this letter was received far too late in the proceeding to investigate the concerns, and furthermore the Department has not been made aware of the concerns prior to its receipt of the letter. The Department notes that it does not differentiate rates for customers based on their level of service; therefore, it will take no action on that request. However, it will conduct an informal inquiry into service in northwest Connecticut, and in particular the concerns of Representative Wilber.

The Department notes that it conducts extensive analysis of the Company's distribution reliability annually in Docket No. 86-12-03, Long Range Investigation To Examine the Adequacy of the Transmission and Distribution Systems of the Connecticut