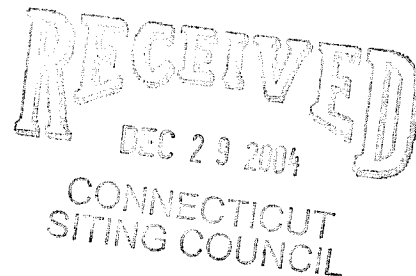


STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL
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PHONE: (860) 827-2900 --- FAX: (860) 827-2929



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 : DECEMBER 29, 2004

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

The Office of Consumer Counsel ("OCC") requests that the Applicants respond to the attached interrogatories by **January 7, 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.

These questions all refer to the Testimony of Anne Bartosewicz and John J. Prete (the "Bartosewicz/Prete Testimony"), filed by the Applicants on December 28, 2004, and to the three project options referenced there, namely:

- (a) the Proposed Route as modified by ROC Report input (the "modified Proposed Route"),
- (b) Alternative A as modified by ROC Report input (the "modified Alternative A"); and
- (c) Alternative B as modified by ROC Report input (the "modified Alternative B").

- OCC-74 The Bartosewicz/Prete Testimony provides updated cost estimates for initial construction costs only. Please provide updated life cycle cost estimates (including repair and maintenance following initial construction) for the modified Proposed Route, for the modified Alternative A and for the modified Alternative B.
- (a) If possible, please provide these life cycle costs by route segment, as in Appendix A of the Bartosewicz/Prete Testimony.
- (b) If possible, provide life cycle cost estimates for the low magnetic field design options discussed at pp. 5-6 of the Bartosewicz/Prete Testimony and in its Appendix B.
- OCC-75 In order to build the modified Proposed Route, modified Alternative A or modified Alternative B, would any additional right-of-way (“ROW”) acquisitions be needed, compared to the ROW needs associated with these three options as originally described in the October 2003 Application?
- (a) If yes, please describe the additional ROW needed.
- (b) If yes, please state whether the associated costs of such additional ROW have been taken into account in the new cost estimates presented in the Bartosewicz/Prete Testimony.
- OCC-76 In the initial Application of October 2003, the Proposed Route is characterized as the best choice for this project, and Alternatives A and B are characterized as less desirable for specific reasons even though technically feasible.
- (a) Do the Applicants believe that this relative ranking of these three options remains appropriate (that is, as a ranking of these options as now modified)? Please explain any answer in specific detail.
- (b) Please refer to the ROC Report filed 12/20/04, and particularly to its conclusion (Executive Summary, p. 4) that ISO and the Companies “would prefer” a transmission design that contains more overhead transmission, because “Case 5” (a/k/a the modified Proposed Route) would be more difficult to construct and operate and carries more risk than “Case 2” (a/k/a the modified Alternative A). Please explain how, if at all, this ROC Report conclusion has been taken into account in the answer provided to Part (a) of this question, just above.
- OCC-77 Refer to the Applicants’ Comments on the Phelps Memorandum, and the Applicants’ Memorandum on the NEPOOL/ISO-NE Planning Procedure No. 4, both as filed in this docket on October 12, 2004. Assume for purposes of this question that the cost estimates for the modified Proposed Route, the modified Alternative A and the modified Alternative B, as

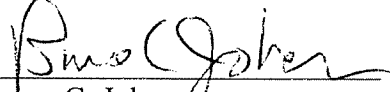
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presented in the Bartosewicz/Prete Testimony, remain accurate at the time the Applicants present their "Schedule 12C" application for cost allocation determinations to ISO New England following completion of the present Siting Council proceeding.

- (a) Assume that the Siting Council has certificated the modified Proposed Route, and further assume that NEPOOL/ISO eventually determines that only the costs that would have been associated with modified Alternative B are eligible for regional cost support. Based on these assumptions, specify (i) the dollar amount within the costs for the modified Proposed Route that thereafter would be regionalized, and (ii) the dollar amount within the costs for the modified Proposed Route that thereafter would be localized.
- (b) Assume that the Siting Council has certificated the modified Alternative A, and further assume that NEPOOL/ISO eventually determines that only the costs that would have been associated with modified Alternative B are eligible for regional cost support. Based on these assumptions, specify (i) the dollar amount within the costs for the modified Alternative A that thereafter would be regionalized, and (ii) the dollar amount within the costs for the modified Alternative A that thereafter would be localized.

Respectfully submitted,

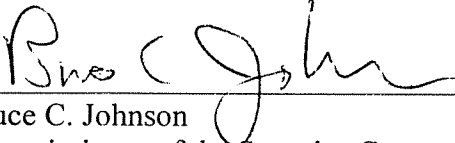
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CERTIFICATION

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 December 2004.



Bruce C. Johnson
Commissioner of the Superior Court