

After the application was filed, PSEG Connecticut and the Applicants reached an agreement, pursuant to which the Applicants will acquire from PSEG Connecticut and/or PSEG Connecticut Development, LLC, a parcel of land located directly across Atlantic Avenue from Site 1 – known as Site 8. PSEG Connecticut has no objection to the use of that parcel for the Singer Substation. Contemporaneously with the filing of this memorandum, PSEG Connecticut has filed Proposed Findings of Fact setting forth the reasons favoring Site 8 over Site 1.

II. The Superiority of Proposed Site 8 over Proposed Site 1

As set forth in PSEG Connecticut’s Proposed Findings of Fact, Site 8 is far superior to Site 1 as a location for the Singer Substation.

- While the use of Site 8 would require demolition of PSEG Connecticut’s warehouse, Site 1 can be used without interfering with PSEG Connecticut’s operations. In fact, by reducing the size of the substation through GIS technology, the facility can be restricted to a 1.5 acre portion of the parcel, leaving approximately 1.3 acres for continued use by PSEG Connecticut in connection with Bridgeport Harbor construction operations.
- Like the facility proposed for Site 1, the substation on Site 8 will not generate noise above background levels.
- Cabling of power into and out of Site 8 can be placed underground to reduce any visual impact on the surrounding neighborhood.
- Since Site 8 is directly across Atlantic Street from Site 1, the additional cost of cabling will be minimal.

¹ Bridgeport Harbor Station is a separate facility covered by a Certificate issued by the Connecticut Siting Council in Docket No. 27, and the warehouse in question is needed to support this facility.

- The Applicants will construct a 35 to 40 foot wall around the facility to shield it from view. The cost of constructing such a shield around Site 8 is less than such construction around the larger Site 1.
- Use of Site 8 will eliminate the expense of demolishing the warehouse on Site 1 – a large, brick facility.
- In light of these savings in construction costs, the cost of acquiring property for and constructing the Singer Substation on Site 8 will be no greater than will be incurred at Site 1.
- Of great importance is the support of the City of Bridgeport for locating the substation on Site 8. As set forth in a letter from Michael Nidoh, the City’s Director of Planning, Bridgeport “*strongly supports* the siting of the proposed substation in Bridgeport at the alternative site [Site 8]” and “*recommends Site #8* to the Siting Council for the proposed Bridgeport substation . . . “ (Emphasis added).

III. Conclusion

The Applicant’s initial proposal, which would have placed the Singer Substation on land occupied by a warehouse used by PSEG Connecticut for equipment and material employed at the Bridgeport Harbor Station, would have interfered with important functions of that station. Such a plan would not have been acceptable to PSEG Connecticut. However, the parties, with the cooperation and support of the City of Bridgeport, have reached an agreement which satisfies the Applicants’ need for a location for the Substation and PSEG Connecticut’s need to continue the critical operations at the Bridgeport Harbor Station with as little disruption as possible.

Accordingly, the Council should accept the amendment of the Application, adopt the findings of fact proposed by PSEG Connecticut, and place the Singer Substation on Site 8.

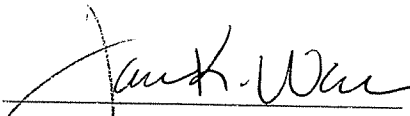
Respectfully submitted,
PSEG POWER CONNECTICUT LLC

A handwritten signature in black ink, appearing to read "Reif", is written over a horizontal line.

David A. Reif
Jane K. Warren
McCarter & English, LLP
CityPlace I
185 Asylum Street
Hartford, CT 06103
T: 860.275.6700
F: 860.724.3397
Its Attorneys

CERTIFICATION

This is to certify that a copy of the foregoing Proposed Findings of Fact has been mailed, via first class mail, postage prepaid, this 11th day of March, 2005 to the attached Service List:



Jane K. Warren

HARTFORD. 634616.01

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

Docket No. 272

<p>Town of Wallingford Town of Durham c/o Peter G. Boucher, Esq. Halloran & Sage, LLP 225 Asylum Street Hartford, CT 06103</p>	<p>Department of Transportation Charles H. Walsh Assistant Attorney General 55 Elm Street Hartford, CT 06141</p>
<p>Northeast Utilities Service Company c/o Anthony M. Fitzgerald, Esq. Brian T. Henebry, Esq. Carmody & Torrance LLP 50 Leavenworth Street P.O. Box 1110 Waterbury, CT 06721-1110</p>	<p>City of Norwalk c/o Louis S. Ciccarello, Esq, Corporation Counsel City of Norwalk P. O. Box 798 Norwalk, CT 06856-0798</p>
<p>The United Illuminating Company c/o Linda L. Randell, Esq. Bruce L. McDermott, Esq. Wiggin & Dana LLP One Century Tower New Haven, CT 06508-1832</p>	<p>Town of Orange Brian M. Stone, Esq. Sousa, Stone & D'Agosto, LLC 375 Bridgeport Avenue Shelton, CT 06484</p>
<p>The Honorable Robert W. Megna State Representative 97th District 40 Foxon Hill Road Unit 54 New Haven, CT 06513</p>	<p>The Honorable Al Adinolfi State Representative 103rd District 235 Sorghum Mill Drive Cheshire, CT 06410</p>
<p>Town of Middlefield c/o Eric Knapp, Esq. Branse & Willis, LLC 41-C New London Turnpike Glen Lochen East Glastonbury, CT 06033-2038</p>	<p>Woodbridge Jewish Organizations c/o David R. Schaefer, Esq. Brenner Saltzman & Wallman, LLP 271 Whitney Avenue New Haven, CT 06511</p>
<p>Senator Joseph J. Crisco, Jr. 17th District State Capitol Hartford, CT 06106-1591</p>	<p>Town of Milford c/o Julie Donaldson Kohler, Esq. Hurwitz & Sagarin, LLC 147 North Broad Street Milford, CT 06460</p>

<p>Town of Wallingford c/o Janis M. Small, Esq. Town Attorney Wallingford Town Hall 45 South Main Street Wallingford, CT 06492</p>	<p>First District Water Department c/o Franco Chieffalo General Supervisor P.O. Box 27 Norwalk, CT 06852</p>
<p>Honorable Leonard A. Fasano State Senator – 34th District 7 Sycamore Lane North Haven, CT 06473</p>	<p>Town of Durham c/o Maryann Boord First Selectwoman Durham Town Hall 30 Townhouse Road Durham, CT 06422</p>
<p>City of New Haven Elizabeth Gilson, Esq. 383 Orange Street New Haven, CT 06511</p>	<p>Town of Westport c/o Ira W. Bloom, Esq. 27 Imperial Avenue Westport, CT 06880</p>
<p>Hon. Mary G. Fritz State Rep. – 90th District 43 Grove Street Yalesville, CT 06492</p>	<p>Town of Woodbridge c/o David A. Ball, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604</p>
<p>City of Meriden c/o Deborah L. Moore, Esq. Legal Department 142 East Main Street Meriden, CT 06450</p>	<p>Michael C. Wertheimer Assistant Attorney General Office of the Attorney General 10 Franklin Square New Britain, CT 06051</p>
<p>Hon. Raymond Kalinowski State Rep. – 100th District P. O. Box 391 Durham, CT 06422</p>	<p>City of Bridgeport Associate City Attorney c/o Melanie J. Howlett, Esq. 999 Broad Street Bridgeport, CT 06604-4328</p>
<p>Communities for Responsible Energy c/o Trish Bradley, President Ed Schwartz, Treasurer 45 Ironwood Lane Durham, CT 06422</p>	<p>Bruce C. Johnson, Esq. Office of Consumer Counsel 10 Franklin Square New Britain, CT 06051</p>
<p>Hon. Themis Klarides State Rep. – 114th District 23 East Court Derby, CT 06418</p>	<p>The Woodlands Coalition for Responsible Energy, Inc. c/o Lawrence J. Golden, Esq. Pullman & Comley, LLC 90 State House Square Hartford, CT 06103-3702</p>

ISO New England, Inc. c/o Anthony M. Macleod, Esq. Whitman Breed Abbott & Morgan, LLC 100 Field Point Road Greenwich, CT 06830	Karyl Lee Hall, Esq. Co-Chairman Branford Conservation & Environment Commission c/o Box 3072 Branford, CT 06405
Town of Fairfield c/o Hon. Kenneth A. Flatto First Selectman 725 Old Post Road Fairfield, CT 06824	Town of Wilton c/o Monte E. Frank, Esq. Cohen and Wolf, P.C. 158 Deer Hill Avenue Danbury, CT 06810
Town of Weston c/o David A. Ball, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604	South Central Connecticut Water Authority c/o Andrew W. Lord, Esq. Murtha Cullina, LLP 185 Asylum Street Hartford, CT 06103-3469
Town of Branford Honorable John E. Opie First Selectman P.O. Box 150, Town Hall Branford, CT 06405	Connecticut Business & Industry Assoc. c/o Robert E. Earley 350 Church Street Hartford, CT 06103-1106
Town of Cheshire c/o Richard J. Buturla, Esq. Berchem Moses & Devlin, P.C. 75 Broad Street Milford, CT 06460	Town of Hamden c/o Joaquina Borges King, Esq. 2750 Dixwell Avenue Hamden, CT 06518
City of Middletown c/o Timothy P. Lynch, Esq. Deputy City Attorney P. O. Box 1300 Middletown, CT 06457-1300	Town of Bethany c/o Hon. Derrylyn Gorski 40 Peck Road Bethany, CT 06524-3378
Town of Easton c/o William J. Kupinse, Jr. P. O. Box 61 Easton, CT 06612	Hon. William A. Aniskovich State Senate – 12 th District 15 Grove Avenue Branford, CT 06405
Town of North Haven c/o David J. Monz, Esq. Updike Kelly & Spellacy, P.C. 265 Church Street New Haven, CT 06510	Sebastian N. Giuliano, Esq. Giuliano, Rafala & Scalora P.O. Box 820 Middletown, CT 06457
Robert Hoff, Esq. Reid and Riege, P.C. One Financial Plaza Hartford, CT 06103	The Honorable Kevin M. DeIGobbo Ranking Member Energy and Technology Committee Legislative Office Building, Room 3904 Hartford, CT 06106