STATE OF CONNECTICUT

SITING COUNCIL

The Connecticut Light and Power Company and Docket 272 The United Illuminating Company Application for a) Certificate of Environmental Compatibility and) Public Need for the Construction of a New 345-kV) **Electric Transmission Line and Associated Facilities**) Between Scovill Rock Switching Station in March 11, 2005) Middletown and Norwalk Substation in Norwalk,) Connecticut Including the Reconstruction of) Portions of Existing 115-kV and 345-kV Electric) Transmission Lines, the Construction of the Beseck) Switching Station in Wallingford, East Devon) Substation in Milford, and Singer Substation in) Bridgeport, Modifications at Scovill Rock Switching Station and Norwalk Substation and the Reconfiguration of Certain Interconnections

MEMORANDUM OF PSEG POWER CONNECTICUT LLC IN SUPPORT OF ITS PROPOSED FINDINGS OF FACT

I. Background

At the time that they filed the Application, the Applicants proposed placing the Singer Substation, one of the facilities associated with this project, on a parcel of land owned by PSEG Connecticut Power, LLC ("PSEG Connecticut") in Bridgeport, Connecticut. The parcel, known as Site 1 in the Application, contains a warehouse, which PSEG Connecticut uses for current storage in connection with the operation of its Bridgeport Harbor Station¹ and which will be used for the storage of materials and equipment during upcoming construction. Placing the substation on that parcel would have required demolition of the warehouse, depriving PSEG Connecticut of that needed facility.

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

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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

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Docket No. 272

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