**STATE OF CONNECTICUT**
**CONNECTICUT SITING COUNCIL**

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| **NORTHEAST UTILITIES SERVICE COMPANY APPLICATION TO THE CONNECTICUT SITING COUNCIL FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED ("CERTIFICATE") FOR THE CONSTRUCTION OF A NEW 345-KV ELECTRIC TRANSMISSION LINE FACILITY AND ASSOCIATED FACILITIES BETWEEN SCOVILL ROCK SWITCHING STATION IN MIDDLETOWN AND NORWALK SUBSTATION IN NORWALK, INCLUDING THE RECONSTRUCTION OF PORTIONS OF EXISTING 115-KV AND 345-KV ELECTRIC TRANSMISSION LINES, THE CONSTRUCTION OF 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** | **DOCKET NO. 272**<br><br>**OCTOBER 24, 2003** |

**TOWNS OF DURHAM AND WALLINGFORD**
**FIRST SET OF INTERROGATORIES**
**TO THE CONNECTICUT LIGHT AND POWER COMPANY**
**AND THE UNITED ILLUMINATING COMPANY**

The Towns of Durham and Wallingford (collectively, the "Towns"), each a party in the above-captioned proceeding, hereby request that The Connecticut Light & Power Company ("CL&P") and The United Illuminating Company ("UI") answer the following interrogatories.[1[1]] The Towns request that CL&P and UI

[1[1]] CL&P and UI are sometimes hereinafter referred to individually as a "Respondent."

respond to the interrogatories on or before November 7, 2003. If there are objections to any of these interrogatories, or if providing responses to particular interrogatories (or portions thereof) would be unduly burdensome, the Towns request that the Respondent contact the undersigned as soon as possible. Questions 1 through 54, inclusive, are directed to CL&P. Questions 55 through 58, inclusive, are directed to UI.

In the event that any interrogatory requests specific data or information that has already been provided in this proceeding, the Respondent need only specifically identify where the responsive data or information is located in the record.

## I. DEFINITIONS

A. As used in these interrogatories, "any" shall include "all," and "all" shall include "any," as needed to make the request inclusive and not exclusive.

B. As used in these interrogatories, "and" shall include "or," and "or" shall include "and," as needed to make the request inclusive and not exclusive. For example, both "and" and "or" mean "and/or."

C. As used in these interrogatories, "include" and "including" mean "including but not limited to."

D. As used in these interrogatories, "CL&P" means The Connecticut Light & Power Company and its present or former subsidiaries, affiliates, branches, divisions, principals, associated persons, control persons, directors, officers, employees, agents, trustees and beneficiaries. Each reference to CL&P shall be deemed to include any, all, or any grouping or subgrouping of persons and entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

E. As used in these interrogatories, "UI" means The United Illuminating Company and its present or former subsidiaries, affiliates, branches, divisions, principals, associated persons, control persons, directors, officers, employees, agents, trustees and beneficiaries. Each reference to UI shall be

deemed to include any, all, or any grouping or subgrouping of persons and entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

F. As used in these interrogatories, "Document" or “Documents” means, as appropriate, all materials and tangible forms of expression in any of the Respondent’s possession, custody or control, whether drafts or unfinished versions, originals or nonconforming copies thereof, however, or by whomever prepared, created, produced, maintained, used, sent, received, dated, or stored (manually, mechanically, electronically or otherwise), including books, papers, records, files, notes, messages, bulletins, letters, chronologies, charts, studies, source documents, graphs, computer printouts, receipts, schedules, itineraries, declarations, affirmations, affidavits, deposition transcripts or other sworn, affirmed or unsworn statements, scripts, press releases, minutes, summaries, analyses, assessments, evaluations, work papers, ledger sheets, confirmations, cables, wires, telecopies, facsimiles, telegrams, telexes, telephone logs, e-mails, notes or records of conversations or meeting, contracts, agreements, notices or advertisements.

## II. TOWNS’ FIRST SET OF INTERROGATORIES TO CL&P

Please identify a witness responsible for each interrogatory response.

1. The following question was submitted to CL&P on June 4, 2003 as Town of Durham Question No. 19, in response to the Municipal Consultation Filing dated May 2003 concerning the Middletown to Norwalk Project and provided to the Towns (the “Municipal Consultation Filing”). However, no response has been provided to date. Therefore, the question is being resubmitted at this time:

   The UI representative at the May 29, 2003 public session in Durham, CT, stated that CL&P and UI have retained a consultant to perform an analysis of how much (i.e., what length) of the Middletown to Norwalk Project can be underground. Please provide copies of any Documents prepared by or for this consultant regarding this analysis. Please also provide any internal CL&P correspondence or any correspondence between CL&P and UI which addresses this analysis.

2. The following question was submitted to CL&P on June 4, 2003 as Town of Durham Question No. 21, in response to the Municipal Consultation Filing. However, no response has been provided to date. Therefore, the question is being resubmitted at this time:

   a. Please explain all of the reasons why, in CL&P’s opinion, adding a new 345 kV line in the existing right-of-way from Oxbow Jct to Chestnut Jct and then from Chestnut Jct to

Black Pond Jct is not a feasible or preferable alternative to building a new overhead 345 kV line through Durham from Oxbow Jct to Beseck SS.

b. Provide copies of any Documents relating to adding a new 345 kV line in the existing right-of-way from Oxbow Jct to Chestnut Jct and then from Chestnut Jct to Black Pond Jct that have been prepared by or for CL&P.

3. The following question was submitted to CL&P on June 12, 2003 as Town of Durham Question No. 22, in response to the Municipal Consultation Filing. However, no response has been provided to date. Therefore, the question is being resubmitted at this time:

   a. Please state whether CL&P has evaluated an underground route through Durham along Maiden Lane for the proposed 345 kV Middletown-Norwalk Project.

   b. If the answer to part a. is yes, please provide the Documents in which CL&P evaluated this route.

   c. If the answer to part a. is yes, please explain in detail why CL&P has not proposed this route in the Municipal Consultation Filing as an alternative to the proposed overhead route.

   d. If the answer to part a. is yes, provide the Documents that formed the basis for CL&P's decision not to propose this route in the Municipal Consultation Filing as an alternative to the proposed overhead route.

   e. If the answer to part a. is no, please explain in detail why CL&P has not evaluated an underground route along Maiden Lane for the proposed 345 kV Middletown-Norwalk Project.

4. The following question was submitted to CL&P on May 22, 2003 as Town of Durham Question No. 7, in response to the Municipal Consultation Filing. However, no response has been provided to date. Therefore, the question is being resubmitted at this time:

   Provide copies of the Documents that formed the basis for CL&P's decision to dismiss the alternative under street route between Oxbow Junction and Beseck Switching Station.

5. CL&P's response to Town of Durham Question No. 18 stated that the "switching analyses" for the Middletown to Norwalk 345-kV Project "will be provided to the Town of Durham when they are complete." Please provide copies of those switching analyses or state the date when they will be provided.

6. CL&P's response to Town of Durham Question No. 20 stated the follows:

"Two separate reviews were performed of the existing right of way in Middletown. The first, a system planning review, resulted in negative implications regarding system reliability. The second, a route analysis, concluded that this right of way was longer, had increased environmental and visual impacts and higher costs when compared to the primary route under consideration."

Provide copies of the Documents relating to each of these reviews.

7. Reference page ES-4 of the Application to the Connecticut Siting Council dated October 9, 2003, in Docket No. 272 ("the Application"). Provide copies of the Documents for the system alternatives analysis for the proposed Middletown to Norwalk Project which assumed that the Bethel to Norwalk line would be built.

8. Reference Figure ES-2 on page ES-5 of the Application. Provide the ISO-New England planning study that concluded or found that strengthening power source to a point in Wallingford needs to be done.

9. Reference Footnote No. 9 on page F-19 of the Application. Provide a copy of the ISO-NE *Technical Assessment of the Generating Resources Required to Reliably Operate Connecticut's Bulk Electric System 2003 and 2006: Final Report*."

10. Reference page F-28 of the Application.

    a. Specify the 18 overloaded line segments that could still occur after the completion of the Middletown to Norwalk Project.

    b. Please provide the Documents which show that 14 of these overloaded line segments can be remedied locally.

    c. Specify the four overloaded line segments that may be eliminated by market or system developments and provide the Documents that form the basis for the belief that each of these segments may be eliminated by market or system developments.

11. Reference page G-1 and Sections G.1, G.2, G.2.1, G.2.2, G.2.3, G.3, G.3.1, and G.3.2of the Application. Provide copies of the Documents for the various system alternatives for enhancing the transmission grid's capabilities to provide the desired level of service access and reliability to SWCT that were investigated by the Applicants.

12. Reference pages G-11 G-12 and Section G.4.1 of the Application.

    a. Provide copies of the Documents for the identification of the best strong source of power available for transmission into SWCT.

    b. Provide copies of the Documents that formed the basis for the determination that a new switching station at Beseck Junction in Wallingford would provide the strongest source.

c. Provide the Documents from the 1970's in which CL&P transmission planners identified Beseck as the likely eastern terminal point of a SWCT 345-kV loop.

13. Reference pages G-12 and G-13 and Section G.4.2 of the Application. Provide copies of the Documents for the evaluation and selection of the terminal points and intermediate terminal points for the Middletown to Norwalk Project.

14. Reference pages G-13 and G-14 and Section G.4.3 of the Application. Provide copies of the Documents for the evaluation and determination of the transmission technology that would be used for the Middletown to Norwalk Project.

15. Reference Section G.4.3.2 of the Application.

    a. Provide copies of the Documents for the evaluation and determination of the voltage level for the Middletown to Norwalk Project.

    b. Reference page G-15 and Section G.4.3 of the Application. Provide copies of the Documents for the evaluation of each of the possible 115 kV and 345 kV solutions.

16. Reference page G-18 and Section 4.3.3 of the Application.

    a. Provide copies of the Documents for the evaluation of incorporating into the loop the existing 345 kV line between Beseck and UI's East Shore Substation in New Haven.

    b. Provide copies of the Documents which form the basis for the statement that "in order to meet national and regional reliability standards, a second 345-kV line would have to be built on separate structures on the Beseck to East Shore ROW."

    c. Provide copies of the Documents that form the basis for the statement that "the addition of these seven miles of underground construction and its associated capacitive charging power, to a configuration that would already include lengthy underground construction, would be highly undesirable from a reliability and operability point of view."

    d. Provide copies of the Documents that form the basis for the statement that "the initial capital cost of a Beseck to East Shore to East Devon 345-kV line would be approximately $100 million more than the cost of a Beseck to East Devon line."

17. Reference page H-2 and Section H.3 of the Application.

    a. Provide copies of the Documents for the evaluation of each of the major route options that were initially considered but were eliminated from detailed consideration.

b. Provide copies of the Documents that formed the basis for the determination that each of these route options should be eliminated from detailed consideration.

18. Reference page H-2 and Section H.4 of the Application.

a. Provide copies of the Documents for the evaluation of each of the other potential routes that were evaluated for the proposed Middletown to Norwalk Project.

b. Provide copies of the Documents that formed the basis for the determination that each of these potential route options should not be selected as the proposed route for the Middletown to Norwalk Project.

19. Reference page H-6 of the Application. Provide a list of all underground transmission lines of longer than 5 to 10 miles in length of which CL&P or its consultants for the Middletown to Norwalk Project are aware.

20. Reference pages H-10 and H-11 and Section H.2 of the Application.

a. Provide copies of the notes, minutes, summaries, reports and other Documents of the meetings, and the other discussions of the team that performed the alternatives identification and evaluation process.

b. Provide copies of the Documents distributed or circulated at the meetings, and at the other discussions of the team that performed the alternatives identification and evaluation process.

c. Provide copies of the materials and other Documents used in presentations made at the meetings, and at the other discussions of the team that performed the alternatives identification and evaluation process.

d. Provide copies of the correspondence between Burns & McDonnell Engineering, Inc. and CL&P or UI regarding the routing analyses performed by Burns & McDonnell Engineering, Inc.

e. Provide copies of the correspondence between Power Delivery Consultants, Inc. and CL&P or UI regarding the evaluation of underground cable types and the identification and evaluation of underground routes that could be suitable for potential cable systems.

f. Provide copies of the correspondence between ESS Group, Inc. and CL&P or UI regarding the review of a marine route performed by ESS.

21. Reference page H-11 and Sections H.3, H.3.1, H.3.2, H.3.3, H.3.4. Provide copies of the Documents for the evaluation of each of the

alternatives to the proposed Middletown to Norwalk Project that were identified and eliminated.

22. Provide a copy of the *Middletown to Norwalk 345-kV Transmission Line Project Highway Corridor Study*, cited on page H-14 of the Application.

23. Reference page H-15 of the Application. Provide copies of the correspondence between the Applicants and the CTDOT relating to the proposed Middletown to Norwalk Project or the alternative examined in highway corridors.

24. Provide a copy of the *Middletown-Norwalk 345-kV Transmission Line Submarine Routing Study* cited on page H-16 of the Application.

25. Provide the correspondence between CL&P and ESS related to the *Middletown-Norwalk 345-kV Transmission Line Submarine Routing Study*.

26. Reference pages H-17 and H-18 and Section H.3.5 of the Application. Provide copies of the Documents for the evaluation of the entire underground cable route alternatives.

27. Reference Table H-1 of the Application.

    a. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-1 titled “Overhead Alternative Routes.”

    b. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-1 titled “Underground Alternative Routes – Along Existing Transmission Corridors.”

    c. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-1 titled “Underground Alternative Routes – Along Existing Roads.”

    d. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-1 titled “Overhead/Underground Combined Alternative Route.”

28. Reference Table H-2 of the Application.

    a. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-2 titled “Overhead Alternative Routes.”

    b. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-2 titled “Underground Alternative Routes – Along Existing Transmission Corridors.”

c. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-2 titled “Underground Alternative Routes – Along Existing Roads.”

d. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-2 titled “Overhead/Underground Combined Alternative Route.”

29. Reference Table H-3 of the Application.

a. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-3 titled “Overhead Alternative Routes.”

b. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-3 titled “Underground Alternative Routes – Along Existing Transmission Corridors.”

c. Provide copies of the Document that form the basis for the conclusions for each location presented in the column in Table H-3 titled “Underground Alternative Routes – Along Existing Roads.”

d. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-3 titled “Overhead/Underground Combined Alternative Route.”

30. Reference Table H-4 of the Application.

a. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-4 titled “Overhead Alternative Routes.”

b. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-4 titled “Underground Alternative Routes – Along Existing Transmission Corridors.”

c. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-4 titled “Underground Alternative Routes – Along Existing Roads.”

d. Provide copies of the Documents that form the basis for the conclusions for each location presented in the column in Table H-4 titled “Overhead/Underground Combined Alternative Route.”

31. Reference page H-42 of the Application. Provide copies of Documents for the estimated capital costs of the proposed Middletown to Norwalk Project and all alternatives examined by or for CL&P.

32. Reference page H-42 of the Application. Provide copies of Documents that compare the capital costs of the proposed route of the Middletown to Norwalk Project with the capital costs of any alternative route(s).

33. Reference page H-43 and Section H.6 of the Application. Reference page H-42 of the Application. Provide copies of Documents for the evaluation of potential locations for the three new stations.

34. Reference page H-42 of the Application. Provide copies of Documents for the evaluation of the modifications that would have to be made at the two existing substations (Scovill Rock Switching Station and Norwalk Substation).

35. Reference pages H-49 through H-51 and Section H.7 of the Application.

    a. Provide copies of Documents related to the examination/investigation of the expansion or addition of underground beyond that included in the proposed route.

    b. Provide copies of Documents that examined/investigated the additional technical and/or operational risks that would result from expanding or adding additional underground sections of the proposed Middletown to Norwalk Project beyond that included in the proposed route.

    c. Provide copies of Documents that examined/investigated the additional technical and/or operational risks that would result from combining overhead and underground sections in the proposed Middletown to Norwalk Project in the manner described as porpoising in the Application.

    d. (Page H-50) Provide copies of Documents related to the examination/investigation of the technical or operational impact of including additional underground segments on the Beseck to East Devon circuit.

    e. (Page H-50) Provide copies of Documents related to the examination/investigation of the cost of including additional underground segments on the Beseck to East Devon circuit.

    f. (Page H-50) Provide copies of Documents related to the examination/investigation of the technical or operational impact of including additional underground segments on the other 345-kV circuits that will connect to the Beseck switching station.

    g. (Page H-50) Provide copies of Documents related to the examination/investigation of the cost of including additional underground segments on the other 345-kV circuits that will connect to the Beseck switching station.

h. Provide copies of the Documents for the comparison of the economic costs of overhead and underground construction between East Devon and Norwalk.

36. Reference the PDC *Evaluation of Potential 345-kV and 115-kV Cable Systems as part of the Middletown-Norwalk Project* included in Volume 6 of the Application.

a. Provide copies of the other evaluations of 345-kV and/or 115-kV cable systems prepared by or for PDC since January 1, 1999.

b. Provide copies of the other evaluations of HPPE or XLPE cables prepared by or for PDC since January 1, 1999.

c. Provide copies of the other evaluations of underground or combined overhead and underground cable systems prepared by or for PDC since January 1, 1999.

d. (Page 5) Provide copies of the Documents that formed the basis for the determination that only 23.6 miles of the proposed Middletown to Norwalk Project should be underground.

e. (Page 33) Provide copies of the Documents prepared by or for PDC, CL&P or UI which examined/investigated the size of the transition stations that would be required if any portion(s) of proposed Middletown to Norwalk Project were underground between Beseck and the East Devon substations.

f. (Page 33) Provide copies of the Documents prepared by or for PDC, CL&P or UI which examined/investigated the operating problems that would be caused if any portion(s) of proposed Middletown to Norwalk Project were underground between Beseck and the East Devon substations.

37. Provide a list of all 115-kV transmission line segments that would be removed if the proposed route for the Middletown to Norwalk Project is adopted. Please also identify the locations from which these segments would be removed.

38. Provide a list of all 115-kV transmission line segments that would be removed if either of the alternatives routes for the Middletown to Norwalk Project is adopted. Please also identify the locations from which these segments would be removed.

39. Regarding the “issues” identified by the DPUC’s 2002 Summer Shortage Report, as discussed on page F-5, if new generating units are added to the transmission system, and these units then cannot be operated at full output because the transmission system needs reinforcement, shouldn’t such reinforcement be the responsibility of the owners of the generating units? If not, why not?

40. Regarding the transmission line loading data portrayed in Table F-4, please provide PTI-compatible saved cases:

    a. For base cases with and without the contingencies depicted; and

    b. For base cases with the Middletown to Norwalk 345 kV transmission line included.

41. Regarding the transmission line loading data portrayed in Figure F-4, please provide PTI-compatible saved cases:

    a. For base cases with and without the contingencies depicted; and

    b. For base cases with the Middletown to Norwalk 345 kV transmission line included.

42. Regarding the circuit breakers in the Pequonnock substation referred to on page F-29, provide the in-service date and the fault current limit for each such breaker.

43. Regarding the switching transients discussed on page H-8:

    a. a. Please describe and provide information detailing the technical capabilities of devices and/or technologies available to control switching transients.

    b. b. Please describe and provide information detailing the installation cost, the operating costs, and maintenance costs of devices and/or technologies available to control switching transients.

    c. c. Please describe and provide information detailing the physical space requirements of devices and/or technologies available to control switching transients.

44. Regarding the steady state voltage issues discussed on pages H-8 and H-9:

    a. a. On a state-of-the art 345 kV underground transmission system, describe and provide materials supporting how long it takes to isolate a typical phase-to-phase fault and a typical phase to ground fault?

    b. b. Please describe and provide information detailing the technical capabilities of devices and/or technologies, including but not limited to the referenced surge arrestors, available to control the voltage transients.

    c. c. Please describe and provide information detailing the installation cost, the operating costs, and maintenance costs of devices and/or technologies, including but not limited to the referenced surge arrestors, available to control voltage transients.

d. d. Please describe and provide information detailing the physical space requirements of devices and/or technologies, including but not limited to the referenced surge arrestors, available to control voltage transients.

45. Regarding the power quality concerns related to the generation and magnification of harmonics discussed on page H-9:

a. a. Please describe and provide information detailing the technical capabilities of devices and/or technologies available to control harmonics generation and/or harmonics magnification.

b. b. Please describe and provide information detailing the installation cost, the operating costs, and maintenance costs of devices and/or technologies available to control harmonics generation and/or harmonics magnification.

c. c. Please describe and provide information detailing the physical space requirements of devices and/or technologies available to control harmonics generation and/or harmonics magnification.

d. d. Please provide copies of CL&P and UI tariff pages addressing the responsibilities, if any, of customers to limit the harmonics that are propagated onto the utility distribution and/or transmission systems from their facilities.

46. Regarding the concerns expressed on page H-49 regarding the low impedance of 345 kV facilities on the Beseck to East Devon circuit:

a. a. Please describe and provide information detailing the technical capabilities of devices and/or technologies available to control transmission line impedance so as to variably increase or decrease such impedance as desirable.

b. b. Please describe and provide information detailing the installation cost, the operating costs, and maintenance costs of devices and/or technologies available to control transmission line impedance so as to variably increase or decrease such impedance as desirable.

c. c. Please describe and provide information detailing the physical space requirements of devices and/or technologies available to control transmission line impedance so as to variably increase or decrease such impedance as desirable.

47. Regarding the concerns expressed on pages H-50 and H-51 regarding the charging power of underground 345 kV facilities:

a. a. Please describe and provide information detailing the technical capabilities of devices and/or technologies available to control the charging power of underground 345 kV facilities.

b. b. Please describe and provide information detailing the installation cost, the operating costs, and maintenance costs of devices and/or technologies available to control the charging power of underground 345 kV facilities.

c. Please describe and provide information detailing the physical space requirements of devices and/or technologies available to control the charging power of underground 345 kV facilities.

48. Reference the Executive Summary (the "Executive Summary") to the Municipal Consultation Filing. Page 8 of the Executive Summary states (in the first sentence of Section I.) that CL&P and UI "plan to file an application [for the Middletown to Norwalk Project] with the Connecticut Siting Council ("Council") on or about August 1, 2003. . . ." Provide copies of all Documents relating to the reasons for or factors considered in delaying the filing of the Application from "on or about August 1, 2003," until October 9, 2003.

49. Reference page 4 of the Executive Summary. The first sentence in the Section entitled Project Components states that CL&P and UI "will use the municipal consultation process to further refine the evaluation of alternatives." Please provide a detailed summary of all changes made to:

(a) the primary route and configuration of and the facilities comprising, the Middletown to Norwalk Project; and

(b) alternative routes and configurations to the Middletown to Norwalk Project;

resulting from the municipal consultation process.

50. Reference Interrogatory 49. Please provide a detailed explanation of, and supporting Documents for, how the municipal consultation process resulted in each change described in the response to Interrogatory 49.

51. Reference Figure E-1 on page E-2 of the Application. Please provide a detailed explanation of all changes to the Middletown to Norwalk Project as represented in that illustration (with respect to both the route of and the equipment contemplated for the Middletown to Norwalk Project), as compared to Figure 15 ("Tentative Route of Proposed 345-kV Transmission Line Middletown area – Norwalk") of the application of Northeast Utilities Service Company in Docket No. 217.

52. Reference the figure entitled "Primary Route Under Consideration" on page 4 of the Executive Summary. Please provide a detailed explanation of all changes to the Middletown to Norwalk Project as represented in that

illustration (with respect to both the route of and the equipment contemplated for the Middletown to Norwalk Project), as compared to Figure 15 ("Tentative Route of Proposed 345-kV Transmission Line Middletown area – Norwalk") of the application of Northeast Utilities Service Company in Docket No. 217.

53. Please identify all Documents submitted to the Connecticut Siting Council in Docket No. 272 in support of the need for the Middletown to Norwalk Project, which were also provided to the Council in support of need in Docket No. 217.

54. Please state whether, and if so, to what extent, the undergrounding of facilities approved by the Siting Council in Docket 217 has any effect on the extent to which the Middletown to Norwalk Project may be placed underground, from either an economic or technical perspective, or both.

## III. TOWNS' FIRST SET OF INTERROGATORIES TO UI

Please identify a witness responsible for each interrogatory response.

55. The UI representative at the May 29, 2003 public session in Durham, CT, stated that CL&P and UI have retained a consultant to perform an analysis of how much (i.e., what length) of the Middletown to Norwalk Project can be underground. Please provide copies of any Documents prepared by or for this consultant regarding this analysis. Please also provide any internal UI correspondence or any correspondence between UI and CL&P which addresses this analysis.

56. Provide copies of the notes, minutes, summaries, reports and other Documents of the meetings of UI's Board of Directors, and all committees and subcommittees thereof, at which the proposed 345 kV Middletown to Norwalk Project was discussed. Please also provide any documents concerning the proposed 345 kV Middletown to Norwalk Project that were distributed to or circulated among the members of UI's Board of Directors and the materials used in any presentation(s) to the Board of Directors, or any committee(s) or subcommittee(s) thereof.

57. Provide copies of the notes, minutes, summaries, reports and other Documents of the meetings of UI's Board of Directors, and all committees and subcommittees thereof, at which the reliability of the transmission system or electric system in Southwestern Connecticut or the need to improve the reliability of the transmission system or electric system were discussed. Please also provide any Documents concerning these issues that were distributed to or circulated among the members of UI's Board of Directors and the materials used in any presentation(s) to the Board of Directors or any committee(s) or subcommittee(s) thereof.

58. Provide copies of any analyses, assessments, reports, studies or other Documents related to the proposed Middletown to Norwalk Project that were prepared by or for UI alone and not by or for CL&P.

Respectfully submitted,

THE TOWNS OF DURHAM AND WALLINGFORD

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Tel: (860) 522-6103

Their Attorneys

## CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, first class postage prepaid, on the above date, to

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