

STATE OF CONNECTICUT

SITING COUNCIL

Re: 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)
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) MAY 24, 2004
Bridgeport, Modifications at Scovill Rock)
Switching Station and Norwalk Substation and the)
Reconfiguration of Certain Interconnections)

**RESPONSES TO FIRST SET OF INTERROGATORIES OF THE
CONNECTICUT LIGHT AND POWER COMPANY DIRECTED TO
TOWN OF WOODBRIDGE WITH RESPECT TO
LAND-TECH CONSULTANTS, INC.**

The Town of Woodbridge hereby responds to the First Set of Interrogatories of the Connecticut Light and Power Company dated March 8, 2004 with respect to Land-Tech Consultants, Inc. (“Land-Tech”).

INTERROGATORIES:

1. Identify the name and address of each expert witness for whom you intend to present pre-filed testimony and/or make available for cross-examination at the hearings in this docket.

Response:

Chris Allan and Thomas Ryder
Land-Tech Consultants, Inc.
205 Playhouse Corner
Southbury, CT 06488

2. Provide a copy of all reports, analyses, and studies prepared by such expert regarding the Middletown to Norwalk Project.

Response: Land-Tech's report is attached to its pre-filed testimony dated May 24, 2004.

3. Provide a copy of all documents, data or other information considered by the expert in forming his/her opinions in this matter, other than any documents, data or information already filed or previously produced by CL&P and/or UI in this docket. With regard to such documents, data or information already filed or previously produced by CL&P and/or UI in this docket (and relied upon by the expert), provide a listing of all such documents, data, or information.

Response: The documents, data or other information considered by Land-Tech are contained in its report attached as Exhibit A to its pre-filed testimony dated May 24, 2004.

4. Provide in both electronic and hard copy form any and all results of system modeling performed by the expert in connection with this docket, including both the model used and the input data.

Response: With respect to Land-Tech, it did not perform system modeling.

5. Provide a copy of any and all exhibits to be used as a summary of or in support of the expert's opinions and testimony.

Response: All exhibits to be used by Land-Tech are contained within the materials submitted with its pre-filed testimony. In addition, Land-Tech will use an approximately 30" by 40" color graphic showing a portion of Woodbridge including the ROW. The graphic was compiled from GIS data and shows the ROW, nearby roads, topography, wetlands, waterbodies, NDDB sites, historic sites, and cultural sites (schools, etc.). It will also include call outs identifying historic and cultural resources and sensitive natural resource areas with estimates of wetland disturbance and wetland fills taken from Land-Tech's report.

6. Provide a complete listing of the qualifications of the expert, including a list of all publications authored by the expert in the last 10 years.

Response: The qualifications of Mr. Allan and Mr. Ryder are contained in their pre-filed testimony, report, and resumes filed with the Siting Council.

TOWN OF WOODBRIDGE

By its attorneys,
Monte E. Frank
David A. Ball
Cohen & Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06601