

May 13, 2004

Ms. Pamela B. Katz
Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 272 - Middletown-Norwalk 345kV Transmission Line

Dear Ms. Katz:

This letter provides the response to requests for the information listed below.

Response to W-M-01 Interrogatories dated 04/07/2004

W-M - 001 , 002 , 003 , 004 , 005 , 006 , 007 , 008 , 009 , 010 *, 011 , 012 , 013 , 014 , 015 , 016 , 017

Very truly yours,

Anne B. Bartosewicz
Project Director - Transmission Business

ABB/yv
cc: Service List

* Due to the bulk nature of this material, the Companies request bulk filing status.

**Witness: Louise Mango
Request from: Towns of Woodbridge and Milford**

Question:

With respect to Woodbridge and Milford, identify each person who you expect to call as an expert witness at the hearings before the Siting Council in connection with the identification of ecological, natural, recreational, historical, archeological and scenic resource values of the proposed transmission line set forth in the Application and its impact thereon. With respect to each such witness:

- (a) state the subject matter on which the expert is expected to testify;
- (b) state his or her qualifications as an expert with respect to the identified subject matter, including a list of all publications authored by the witness within the preceding ten years, and provide a copy of his or her curriculum vitae;
- (c) provide a complete statement of all opinions to be expressed and the basis and reasons therefore;
- (d) identify the data or other information considered by the witness in forming his or her opinions;
- (e) identify any exhibits to be used as a summary of or as support for the opinions;
- (f) identify all cases or administrative hearings during which the witness testified as an expert within the preceding four years;
- (g) state the compensation paid or to be paid for the witness' study and testimony; and
- (h) provide copies of any retainer agreements or letters of engagement for each expert, and documents concerning (c)(d) and (e) above.

Response:

- a. Louise Mango will serve as the Companies' lead witness. In addition, the following persons may be called upon to address specific issues:

Jeff Borne, CL&P
Don Biondi, CL&P
Kate Shanley, UI
Ken Stevens, SSES
Michael Raber, Raber Associates

These witnesses will testify with regard to ecological, natural, recreational, historical, archeological and scenic resource values of the proposed transmission line. The substance of the testimony of these witnesses will be disclosed in pre-filed testimony to be filed.

- b. The Companies' expert witnesses received degrees in this area of study, have worked in this field for more than 20 years, have been directly involved on a number of large longitudinal projects involving many Connecticut towns/municipalities, are highly trained and qualified, and possess both experience and expertise. Ms. Mango's qualifications are presented in her curriculum vitae that is attached to her pre-filed testimony dated April 8, 2004. The qualifications of the other members of the panel will be provided as part of Ms. Mango's pre-filed testimony that will be filed in accordance with the schedule established by the Council.
- c. Please refer to the pre-filed testimony of Ms. Mango that will be filed with the Council in accordance with the schedule established by the Council.
- d. This data is identified and set forth in the Application (Volumes 1 – 3, 4, and 8 – 12) and in the responses to the interrogatories filed in this docket. The witnesses would also rely upon their education, training and work experience.
- e. Please refer to the pre-filed testimony of Ms. Mango that will be filed with the Council in accordance with the schedule established by the Council.
- f. Louise Mango, Connecticut Siting Council Dockets 217 and 259
Don Biondi, Connecticut Siting Council Docket 217
Michael Raber Connecticut Siting Council Docket 217
- g. Louise Mango, \$75/hour
Ken Stevens, \$85/hour
Michael Raber, \$73/hour
The other witnesses are employed by the Companies and would not receive compensation other than their regular salary for their Siting Council testimony.
- h. This interrogatory is overly broad and goes beyond reasonable discovery and long-standing practice in Siting Council proceedings. Under the Uniform Administrative Act, a party has the opportunity to "inspect and copy relevant and material records, papers and documents not in the possession of the party or such agency, except as otherwise provided by federal law or any other provision of the general statutes..." Conn. Gen. Stat. §4-177c(1)(emphasis added).

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-002
Page 1 of 1

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

With respect to Woodbridge and Milford, identify any person or entity who consulted with or provided information to the Applicant on issues relating to the identification of ecological, natural, recreational, historical, archeological and scenic resource values of the proposed transmission line set forth in the Application.

Response:

See response to data request W-M-01, Q-W-M-001. Also see Table Q-1, Volume 1, of the Application and the Pre-Filed Testimony of Roger Zaklukiewicz dated March 8, 2003 that identifies other consultants who provided assistance during the route selection process.

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-003
Page 1 of 1

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

With respect to Woodbridge and Milford, identify any person or entity who consulted with or provided information to the Applicant on issues relating to the impact on ecological, natural, recreational, historical, archeological and scenic resource values as a result of the proposed transmission line set forth in the Application.

Response:

See response to data request W-M-01, Q-W-M-002.

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-004
Page 1 of 1

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

With respect to Woodbridge and Milford, identify any person or entity who consulted with or provided information to the Applicant on issues relating to the identification of ecological, natural, recreational, historical, archeological and scenic resource values of any alternative route to the proposed transmission line set forth in the Application.

Response:

See response to data response W-M-01, Q-W-M-002.

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-005
Page 1 of 1

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

With respect to Woodbridge and Milford, identify any person or entity who consulted with or provided information to the Applicant on issues relating to the impact on ecological, natural, recreational, historical, archeological and scenic resource values as a result of any alternative to the proposed transmission line set forth in the Application.

Response:

See response to data request W-M-01, Q-W-M-002.

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-006
Page 1 of 1

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

Please provide all documents (including without limitation all internal or external memos, maps, reports, notes, field notes, surveys, studies, drafts, correspondence) of any of the persons or entities identified in response to questions # 1 through 5 above.

Response:

This interrogatory is overly broad and goes beyond reasonable discovery and long-standing practice in Siting Council proceedings. Under the Uniform Administrative Act, a party has the opportunity to “inspect and copy relevant and material records, papers and documents not in the possession of the party or such agency, except as otherwise provided by federal law or any other provision of the general statutes...” Conn. Gen. Stat. §4-177c(1)(emphasis added). CL&P and UI object to this interrogatory to the extent that the interrogatory does not seek relevant and material information. Accordingly, CL&P and UI are answering this interrogatory to the extent the interrogatory seeks information that will assist the Siting Council in determining whether the statutory criteria for granting a certificate of environmental compatibility and public need have been met in this proceeding.

Without waiving this objection, see response to data request W-M-01, Q-W-001.(d).

**Witness: Louise Mango
Request from: Towns of Woodbridge and Milford**

Question:

With respect to Woodbridge and Milford, please provide all documents (including without limitation all internal or external memos, maps, emails, reports, notes, field notes, surveys, studies, correspondence, minutes or records of board or committee meetings) relating to, referring to, describing, evidencing or constituting the following:

- a. The scenic resource values of the Towns in and around the area of the proposed overhead 345 kv transmission line.
- b. The impact on the scenic resource values identified in response to the preceding question.
- c. The historical resource values of the Towns in and around the area of the proposed overhead 345 kv transmission line.
- d. The impact on the historical resource values identified in response to the preceding question.
- e. The archeological resource values of the Towns in and around the area of the proposed overhead 345 kv transmission line.
- f. The impact on the archeological resource values identified in response to the preceding question.
- g. An assessment of the proposed actions including without limitation an explanation as to why alternatives to avoid or minimize impacts identified in response to questions a. – f. were not selected and how the measures proposed will effectively mitigate these unavoidable impacts on scenic, historical and archeological resource values.

Response:

This interrogatory is overly broad and goes beyond reasonable discovery and long-standing practice in Siting Council proceedings. Under the Uniform Administrative Act, a party has the opportunity to “inspect and copy relevant and material records, papers and documents not in the possession of the party or such agency, except as otherwise provided by federal law or any other provision of the general statutes...” Conn. Gen. Stat. §4-177c(1)(emphasis added). CL&P and UI object to this interrogatory to the extent that the interrogatory does not seek relevant and material information.

Without waiving this objection, see response to data request W-M-01, Q-W-001.(d).

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-008
Page 1 of 1

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

With respect to Woodbridge and Milford, please provide all documents (including without limitation all internal or external memos, maps, emails, reports, notes, field notes, surveys, studies, correspondence, minutes or records of board or committee meetings) relating to, referring to, describing, evidencing or constituting an environmental assessment of the proposed actions including without limitation an explanation as to why alternatives to avoid or minimize environmental impacts were not selected and how the measures proposed will effectively mitigate these unavoidable impacts on regulated areas.

Response:

This interrogatory is overly broad and goes beyond reasonable discovery and long-standing practice in Siting Council proceedings. Under the Uniform Administrative Act, a party has the opportunity to “inspect and copy relevant and material records, papers and documents not in the possession of the party or such agency, except as otherwise provided by federal law or any other provision of the general statutes...” Conn. Gen. Stat. §4-177c(1)(emphasis added). CL&P and UI object to this interrogatory to the extent that the interrogatory does not seek relevant and material information.

Without waiving this objection, see response to data request W-M-01, Q-W-001.(d).

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-009
Page 1 of 3

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

With respect to Woodbridge and Milford, provide all correspondence (including letters, email, notes of meetings, or memos of meetings) with the Connecticut Historical Commission concerning the proposed transmission line set forth in the Application.

Response:

The Companies object to this interrogatory to the extent the interrogatory seeks the production of meeting notes and memoranda of meetings. Without waiving this objection, CL&P and UI respond as follows: See Table Q-1 in Volume 1 of the Application and copy of 4/13/03 letter from the Connecticut Historical Commission in the Federal, State and Municipal Agencies Correspondence section in Volume 4 of the Application.

See attached copy of the 4/13/03 letter from the Connecticut Historical Commission and a post-Application correspondence with the State Historic Preservation Office dated 4/20/04.



W-M-009 Attachments.pdf



STATE OF CONNECTICUT
CONNECTICUT HISTORICAL COMMISSION
April 14, 2003

CL&P/UI Docket No. 272
Data Request W-M-01
Dated 04/07/2004
Q-W-M-009 - Page 2 of 3

Mr. Jeffrey O. Borne
Northeast Utilities Service Company
PO Box 270
Hartford, CT 06141-0270

Subject: 345-kV Transmission Line Project
Middletown to Norwalk, CT

Dear Mr. Borne:

The State Historic Preservation Office has reviewed preliminary information provided by Northeast Utilities Service Company concerning a proposed new 345-kV electric transmission line from Scovill Rock Substation (Middletown) to Norwalk Substation (Norwalk). In particular, this office has reviewed the proposed scope of work for technical architectural and archaeological services prepared by Raber Associates with respect to the identification, evaluation, and analysis of significant historic, architectural and archaeological resources vis-a-vis potential project-related visual and/or physical impacts.

In the opinion of the State Historic Preservation Office, the archival, archaeological, and analytical methodologies proposed by Raber Associates appear consistent with our *Environmental Primer for Connecticut's Archaeological Resources*. If professionally implemented, this office expects that Raber Associates' proposed investigations should comprehensively identify all historic and architectural properties which are listed on or eligible for the National and/or State Register of Historic Places that may be located in proximity to the potential viewshed of the proposed overhead facilities. Likewise, we believe that Raber Associates' proposed archaeological assessment studies will provide important data for future decision-making concerning the archaeological sensitivity, or lack thereof, for possible underground components.

The State Historic Preservation Office looks forward to further coordination with Northeast Utilities Service Company, Raber Associates and all interested parties regarding the planning and design of the proposed 345-kV transmission facilities and the professional management of Connecticut's cultural heritage.

For further information please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

John W. Shanahan
Director and State Historic
Preservation Officer

cc: Bellantoni, Raber



STATE OF CONNECTICUT

State Historic Preservation Office

Commission on Arts, Tourism, Culture, History and Film

CL&P/UI Docket No. 272
Data Request W-M-01
Dated 04/07/2004
Q-W-M-009 – Page 3 of 3

April 20, 2004

Mr. Jeff Borne
Northeast Utilities
P.O. Box 270
Hartford, CT 06141-0270

Subject: 345-kV Transmission Facilities
Middletown to Norwalk, CT

Dear Mr. Borne:

The State Historic Preservation Office has reviewed the *Application to the Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need for a 345-kV Electric Transmission Line Facility and Associated Facilities* prepared by the Connecticut Light & Power Company and the United Illuminating Company. In particular, this office has examined the *Cultural Resources Assessment of Middletown-Norwalk 345 KV Transmission Project: Proposed Route with Supported Changes and Alternative Routes*, prepared by Raber Associates.

In the opinion of the State Historic Preservation Office, the historic, architectural and archaeological investigations undertaken by Raber Associates appear consistent with our *Environmental Review Primer for Connecticut's Archaeological Resources*. This office further believes that the *Cultural Resources Assessment* provides a critical framework for future decision-making regarding the evaluation and professional management of Connecticut's cultural heritage. The preliminary assessment of historic, architectural and archaeological resources appears consistent with the Connecticut Environmental Policy Act and the National Historic Preservation Act.

The State Historic Preservation Office anticipates in-depth consultation with the Connecticut Light & Power Company, the United Illuminating Company, and all interested parties regarding the professional management of cultural resources vis-a-vis the to-be-drafted Development & Management Plan and the subsequent analysis of potential visual and/or physical impacts upon the state's historic, architectural and archaeological resources.

For further assistance please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Paul Loether", written over a horizontal line.

J. Paul Loether
Deputy State Historic
Preservation Officer

cc: Bellantoni, Raber

59 SOUTH PROSPECT STREET HARTFORD, CONNECTICUT 06106-1901
Telephone: 860-566-3005 Facsimile: 860-566-5078

AN EQUAL OPPORTUNITY EMPLOYER

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-010
Page 1 of 1

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

With respect to Woodbridge and Milford, provide all correspondence (including letters, email, notes of meetings, or memos of meetings) with the Connecticut Department of Environmental Protection concerning the proposed transmission line set forth in the Application.

Response:

The Companies object to this interrogatory to the extent the interrogatory seeks the production of email, meeting notes and memoranda of meetings. Without waiving this objection, CL&P and UI respond as follows: See Table Q-1 in Volume 1 of the Application and copies of correspondence in the Federal, State and Municipal Agencies Correspondence section in Volume 4 of the Application.

In addition, see attached copies of post-Application correspondence with the Department of Environmental Protection.

* Due to the bulk nature of this material, the Companies request bulk filing status.



W-M-010 Attachments.pdf

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-011
Page 1 of 1

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

Provide all correspondence (including letters, email, notes of meetings, or memos of meetings) with the Connecticut Department of Public Health concerning the proposed transmission line set forth in the Application.

Response:

The Companies object to this interrogatory to the extent the interrogatory seeks the production of email, meeting notes and memoranda of meetings. Without waiving this objection, CL&P and UI respond that there is no correspondence with the Connecticut Department of Public Health (other than service of the Companies' Application as required by Conn. Gen. Stat. 16-50l).

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-012
Page 1 of 1

Witness: Anne Bartosewicz; John J. Prete
Request from: Towns of Woodbridge and Milford

Question:

Provide all correspondence (including letters, email, notes of meetings, or memos of meetings) with the Connecticut Department of Transportation concerning the proposed transmission line set forth in the Application.

Response:

The Companies object to this interrogatory to the extent the interrogatory seeks the production of meeting notes and memoranda of meetings. Without waiving this objection, CL&P and UI respond as follows: See data response to CSC-01, Q-CSC-030.

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-013
Page 1 of 1

Witness: Anne Bartosewicz; John J. Prete
Request from: Towns of Woodbridge and Milford

Question:

A July 9, 2003 letter to Amey Marrella from John Prete stated that the Applicants looked at the alternative of building a 345-kV line from Frostbridge to East Devon along the existing ROW instead of Segments 1 and 2 of the M/N Project. Please provide the documents in which this alternative was examined by or for the Applicants.

Response:

See the discussion contained in Section G.4.1 of Volume 1 of the Application regarding the best strong source. In addition, see pages 11-19 of the pre-filed testimony of Roger Zaklukiewicz dated March 9, 2004 regarding this same issue. These conclusions are based on the Companies' knowledge of the existing transmission system and its response and operation for various load levels, generation dispatches, and transmission contingencies. The conclusions are not reflected in any reports, analyses, or studies.

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-014
Page 1 of 1

Witness: Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

With respect to Woodbridge and Milford, will improvements to access roads through wetlands remain in-place to provide permanent pole access, or will access roads be removed and wetlands restored?

Response:

Improvements to access roads through wetlands may be left in place or removed depending upon permit conditions ordered by the CSC, Army Corps of Engineers, Connecticut Department of Environment Protection, and/or landowners agreements.

CL&P/UI
Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-015
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: Towns of Woodbridge and Milford

Question:

Volume 1 Section J.1.6 states that pulling sites are 50-75 feet wide by 100-200 feet long. Section K.3 states that pulling sites are about one acre in size. Which one should be used to estimate the area of disturbance?

Response:

A site size of approximately 1/3 acre (75' x 200') should provide sufficient space to accommodate the required conductor pulling equipment.

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Docket No. 272

Data Request W-M-01
Dated: 04/07/2004
Q- W-M-016
Page 1 of 1

Witness: Roger C. Zaklukiewicz; Louise Mango
Request from: Towns of Woodbridge and Milford

Question:

With respect to Woodbridge and Milford, could existing poles within wetlands be cut by hand and dropped leaving only the foundation in place to reduce wetland impacts? If so, would this significantly reduce the area of impact to wetlands?

Response:

Wood pole structures are typically removed by mechanical means. In sensitive areas, such as wetlands, less intrusive alternative methods of removal such as hand cutting the pole at the groundline and leaving the pole butt in the ground can be followed. However, safety practices must be followed during the dismantling of a wood or steel lattice structure, such as the use of mechanical equipment to stabilize the structure during removal. The placement of equipment will be considered and incorporated in the D&M plans the Companies submit to the CSC so as to minimize impact to wetlands.

Witness: Roger C. Zaklukiewicz
Request from: Towns of Woodbridge and Milford

Question:

Are conductor pulling sites required at all angle points in the existing right of way? If so, is one required at Pease Junction in Woodbridge? If not, can the pulling site located northeast of Rimmon Road in Woodbridge be relocated outside of the wetland?

Response:

Conductor pulling sites are typically located at line angle points, however, they are not required at all line angle points. Several factors are considered in determining pulling site locations. First, the site must be relatively level and accessible by the equipment used during a cable pulling operation. Second, several design factors must also be considered. The maximum conductor pull length cannot exceed 15,000 feet, which equates to the total length of cable on two cable reels spliced together. Also, the sum of the running line angles must be limited, typically between 90 and 180 degrees, due to increased tension to the cable and the heating of the pulling blocks. Structures having severe line angles, such as 45 degrees and greater, are oftentimes deadended and used as a pulling site.

The aerial photographs provided in the CSC application identify potential cable pulling sites but there was no pulling site identified at Pease Road Junction in Woodbridge. There is a pulling site identified northeast of Rimmon Road in Woodbridge which, after the wetland boundaries were identified, appears to be within a wetland area. Wherever possible, any preliminary conductor pulling site which is determined to be in a wetland area will be relocated.