

TO: Connecticut Siting Council
Melanie Bachman
Executive Director
123 Main St
New Britain, CT 06051

RE: PETITION NO. 1120 – The United Illuminating Company petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed modifications to the Hawthorne Substation located at 180 Hawthorne Drive, Fairfield, Connecticut.

Dear Ms. Bachman:

Attached, please find the first set of interrogatories, numbered 1 through 20, of Intervenor Vincent Giandurco (145 Hawthorne Drive, Fairfield, CT) to United Illuminating, regarding Petition Number 1120.) Intervenor Giandurco requests that the Petitioner, United Illuminating Company, respond to these Interrogatories by April 17, 2015.

The Original and 15 copies of this document will be delivered to the Council via USPS.

Respectfully submitted,

Vincent Giandurco
145 Hawthorne Drive
Fairfield, CT 06825
203-520-2666

cc. Parties and Intervenors

- 1 - Please provide a list of all abutting property owners notified per statutory requirements as of March 17, 2015, and indicate the date of delivery of these notices.
- 2 - What was the date and results of the most recent required annual ElectroMagnetic Frequency Gauss level testing for both Hawthorne substation and adjacent power lines? Please attach a copy of the results.
- 3 - What were the results of any environmental testing performed on site prior to purchase from former owner, and in preparation for upcoming construction and operation? Please attach a copy of these results.
- 4 - Has UI investigated the potential affects that this plan will have on designated wetlands on and surrounding planned expansion site, and what have these investigations determined? Please attach a copy of any investigatory results on wetlands impacts.
- 5 - Please detail any stormwater retention and run-off plans for the site, and provide copies of any stormwater engineering reports for this site.
- 7 - Have any investigations taken place regard the impact of the proposed plan on the on-site habitat of the Eastern Box Turtle, a designated Species of Special Concern? Please attach a copy of any such investigation.
- 8 - Please provide data and/or other reasoning for increasing the number of lighting masts from three to eight.
- 9 - Please explain why the increase in lighting fixtures was not included or visible in the Petition or Simulation.
- 10- Please provide any available data regarding the increase in lighting power, output, and visibility that will result from the increased number of masts and lighting fixtures?
- 11- Please explain why these highly visible aspects of the plan were not included in a highly detailed Simulation.
- 12 - The petition indicates that the expansion will require the cutting down of approximately 40 trees. Please indicate which trees will be cut down, whether the environmental impact of the removal of these trees was considered, and whether any alternatives were considered that would require less trees be removed.
- 13 - The substation site is a habitat for wild turkeys, many of which nest and sleep in the trees in and around the site. Please provide the results of any investigations that were performed as to the impact of the plan on wild fowl habitat.
- 14 - The substation site lies within a migratory pattern for many types of birds. These birds tend to nest at times in the trees in the vicinity of the substation, and also to feed in the immediate area. Please provide the results of any investigations that were performed as to the impact of the plan (specifically, the removal of these trees, and the addition of five tall lightning masts with high-intensity lighting fixtures) on bird migration patterns and the safety of migratory birds.

15 - The construction phase of the project will include aluminum cutting. Please provide details as to how UI plans to mitigate the airborne dissemination of fine aluminum particles. Can this aluminum cutting and any other potentially hazardous activity be done off-site?

16 - Large power-generating plant capacitors, such as those proposed for this expansion, have been known to suffer “catastrophic failure”, including explosion and fire. Please provide details as to how UI plans to mitigate this potentiality, and also to mitigate the potential property damage and harm done to human and animal neighbors if such failure does occur in the future.

17 - In what ways will UI mitigate the aesthetic impact of this proposed expansion and construction upon the abutting properties and the adjacent neighborhood?

18 – According to a filing on the CSC website, UI plans to install a new substation in Fairfield in the year 2020. In a response given to the CSC on March 16, 2015, UI states that: “UI has no current plans for additional capacity upgrades at this substation in the ten year planning horizon.” Which of these planning horizons is accurate?

19 - Given the evidence of a plan for a new substation in 2020, is the currently proposed expansion of the current substation necessary?

20 – The Schiller-Hawthorne wetlands are critical to protecting the water quality of the nearby lakes and rivers. Wetland buffering areas are being cleared or reduced by the new addition. Given these reductions, what will protect the wetlands and the nearby lakes and rivers? Also, will the new construction require the clearing of the wetland's current natural vegetated buffering?

- end -