



**Northeast  
Utilities System**

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March 5, 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.

While it is not possible to provide all the information requested at this time, the Company is attaching the information which has been completed.

Response to PSEG-01 Interrogatories dated 02/11/2004  
PSEG - 003 \*, 018 , 019 , 020 , 022 , 028 , 044 \*

Very truly yours,

Anne B. Bartosewicz  
Project Director - Transmission Business

ABB/tms  
cc: Service List

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

**Witness: Anne Bartosewicz; John J. Prete**  
**Request from: PSEG Power Connecticut**

**Question:**

With respect to the references to the "relationship of applicants" and "the Company's Agreement" that appear at page D-2 of Volume 1 of the Application, please fully explain how "the relationship of the applicants" and "the Company's Agreement" was formed in connection with this Project. Include in your explanation all relevant information including, but not limited to, the following:

- a. The dates and times of all meetings or teleconferences between UI and CL&P relative to the formation of this relationship and agreement;
- b. Identify all participants in those meetings or teleconference;
- c. Provide a summary of what was discussed at each meeting or teleconference;
- d. If the discussions occurred during meetings, state where each meeting took place; and
- e. Provide a copy of any minutes of those meetings or reports which arose from those meetings as the same relate to the Singer Site; any connecting cable (whether included as part of the project or anticipated for later construction) or transmission line between the facilities to be placed on the Singer Site and any other portion of the project; and/or to any alternative location for the substation presently proposed for the Singer Site.

**Response:**

The Conceptual Stage Agreement RE: Middletown to Norwalk 345-kV Transmission Line between The United Illuminating Company and Northeast Utilities Service Company, acting as agent for the Connecticut Light & Power Company, is attached. This agreement is "the Company's Agreement" and sets forth the "relationship of applicants" for the Project. CL&P and UI did not keep records of all of the meetings or teleconferences and object to this interrogatory to the extent that the interrogatory does not seek relevant and material information.

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

**CL&P/UI**  
**Docket No. 272**

**Data Request PSEG-01**  
**Dated: 02/11/2004**  
**Q- PSEG-018**  
**Page 1 of 1**

**Witness: John J. Prete**  
**Request from: PSEG Power Connecticut**

**Question:**

Identify who at UI and CL&P participated in any aspect of the Singer Substation Site Selection Study ("Site Selection Study") included in Volume 6 of the Application and describe the role of such person.

**Response:**

Providing a list of those individuals who participated in the preparation, review and production of the Singer Substation Site Selection Study will not 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. If PSEG has specific questions concerning the Study, a witness will be available during the Siting Council hearings to answer those questions.

**Witness: John J. Prete**  
**Request from: PSEG Power Connecticut**

**Question:**

With reference to the executive summary contained in page 2 of the Site Selection Study, fully explain how UI and CL&P claims they determined that the referenced PSEG warehouse was allegedly "empty"? Identify all persons who allegedly made such inquiry on behalf of Applicants, who at PSEG allegedly provided such information and when such inquiry was made. If any documents exist which relate thereto, produce a copy.

**Response:**

The determination that the warehouse was "empty" was made in October 2003, based on a visual observation of the warehouse and the state of disrepair of the warehouse and the surrounding fence. No conversations concerning this issue took place with PSEG. Additionally, aerial photographs show a hole in the roof of the warehouse which provided further evidence that the warehouse was empty. Also, UI personnel observed on many occasions during the Site Selection process that there appeared to be no activity at the Site. The appraiser UI hired to appraise the property made similar observations. No conversations concerning this issue took place with PSEG. However, during a November 1, 2002 meeting with Robert Parnell, currently Director Asset Operations, PSEG Power Connecticut LLC, Mr. Parnell stated that the warehouse parcel was available, leading UI to believe that it was not in use. At the time of the meeting, Mr. Parnell was Director of Asset Operations, Wisvest-Connecticut, LLC. However, during the November 1, 2002 meeting, which took place after PSEG announced its acquisition of Wisvest's Bridgeport Harbor Station, Parnell told UI that he was speaking on behalf of both Wisvest and PSEG.

CL&P and UI object to the scope of the term "Document", as contained in this interrogatory and as defined in the "Definitions" section. Please also see the full objection regarding relevance in the first paragraph to the response of D-W-01, Q-D-W-001.

**Witness: John J. Prete**  
**Request from: PSEG Power Connecticut**

**Question:**

With respect to the executive summary at page 2 of the Site Selection Study, did the City of Bridgeport support siting of the Singer Substation at any of the ten referenced potential sites, other than Site 1?

- a. If so, which ones?
- b. Did the City oppose siting the substation at any of the other ten referenced potential sites?
- c. If so, which ones?
- d. Were all of the other ten potential sites disclosed to the City?
- e. If not, which ones were not disclosed and why?
- f. Please identify who, at the City had any discussions with the Applicants relative to the other ten potential sites discussed in the Site Selection Study and when those discussions occurred.
- g. Provide copies of all documents constituting or concerning communications, in any form, between the Applicants and the City relative to any of the ten other potential sites for the Singer Substation.

**Response:**

a-e No. The city has stated its opposition to the siting of the substation at some of the other ten potential sites. CL&P and UI refer PSEG to Appendix F of the Singer Substation Site Selection Study which is a letter from Michael Nidoh, Director of Planning, regarding the City of Bridgeport's preference that the Singer Substation be constructed on Site 1. Additionally, the following is Mr. Nidoh's statement to the Siting Council on December 17, 2003.

*"Of concern to the City of Bridgeport is the siting of the proposed substation here in the city. The City supports the proposed Singer Substation site on lower Main Street and the city south end neighborhood. We will vigorously oppose any substation sites that are located within the historic residential neighborhood of the south end. The siting of such a facility within the neighborhood would adversely impact the City's established redevelopment and land use plans of the south end. The City of Bridgeport respectfully requests that the Connecticut Siting Council use its authority to direct the siting of the proposed substation to the United Illuminating Company's recommended Singer site, thereby protecting the integrity of the residential character of the City's south end."*

All of the other ten potential sites were disclosed to the City.

f. Michael Nidoh, Director of Planning  
Melanie Howlette, Assistant City Attorney

g. CL&P and UI object to the scope of the term "Document", as contained in this interrogatory and as defined in the "Definitions" section. Please also see the full objection regarding relevance in the first paragraph to the response of D-W-01, Q-D-W-001.

**Witness: John J. Prete**  
**Request from: PSEG Power Connecticut**

**Question:**

Reference is made to the discussion of alternate Site 5 on page 7 of the Site Selection Study.

- a. Fully explain why, in the Applicants' opinion, PSEG's intended future use of the site a "con" to siting the Singer Substation at that location?
- b. Fully explain the Applicants' understanding as to the future intended use PSEG planned for Site 5?
- c. Fully explain how the Applicants reached that understanding?

**Response:**

a. PSEG told UI that it intended to use Site 5 for environmental control measures (i.e. scrubbers).

b. See a.

c. This information was provided to UI by Robert Parnell, Director Asset Operations, PSEG Power Connecticut LLC on November 1, 2002. At the time of that conversation, Mr. Parnell also said that Site 1 would be a good location for the Singer Substation. In late November 2002. Robert Parnell confirmed that Site 5 was unavailable.

**CL&P/UI**  
**Docket No. 272**

**Data Request PSEG-01**  
**Dated: 02/11/2004**  
**Q- PSEG-028**  
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**Witness: John J. Prete**  
**Request from: PSEG Power Connecticut**

**Question:**

If the Applicants maintain that they are not able to take "Site 6" or any other of the ten sites referenced in the application by eminent domain, please state as to which sites the Applicants maintain that the power of eminent domain is not available.

**Response:**

There are no sites other than Site 6 for which the power of eminent domain is not available.

**CL&P/UI**  
**Docket No. 272**

**Data Request PSEG-01**  
**Dated: 02/11/2004**  
**Q- PSEG-044**  
**Page 1 of 1**

**Witness: Peter T. Brandien**  
**Request from: PSEG Power Connecticut**

**Question:**

Reference is made to page G-13 of Volume 1 of the Application. Please fully explain the "conditions" which might "preclude the simultaneous operation of all of the generation in Bridgeport" and/or "maximum capability" in Milford and Devon". If any studies or reports exist relating thereto, provide a copy thereof.

**Response:**

Attached please find the System Impact Study, Milford Power 560 MW Power Plant, Thermal and Fault Duty Analysis dated April 1999. Section 5.3 contains analyses that identifies transmission constraint in the vicinity of the Devon Substation.

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