

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

NORTHEAST UTILITIES SERVICE
COMPANY APPLICATION TO THE
CONNECTICUT SITING COUNCIL
FOR A CERTIFICATE OF
ENVIRONMENTAL
COMPATIBILITY AND PUBLIC
NEED ("CERTIFICATE") FOR THE
CONSTRUCITON 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

RECEIVED
FEB 13 2004
CONNECTICUT
SITING COUNCIL

FEBRUARY 11 2004

PSEG POWER CONNECTICUT LLC'S
FIRST SET OF INTERROGATORIES
TO THE CONNECTICUT LIGHT & POWER COMPANY
AND THE UNITED ILLUMINATING COMPANY

PSEG Power Connecticut LLC ("PSEG") hereby requests that The Connecticut
Light & Power Company ("CL&P") and The United Illuminating Company ("UI")
(collectively "the Applicants") answer the following interrogatories.

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 Respondents’ 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 meetings, contracts, agreement, notices or advertisements.

G. The term “Application” means the application to the Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need filed by CL&P and UI in the above-captioned docket.

H. The term “Project” means the construction of the Middletown-to-Norwalk

345-kV transmission line, and all associated switching stations, substations and related facilities (as the term “facilities” is used in Conn. Gen. Stat § 16-50a, et seq.), that are the subject of the Application.

I. The terms “Singer Substation” and “Site 1” shall mean the PSEG property situated at the corner of Atlantic and Main Streets in Bridgeport, Connecticut where the Application contemplates a substation shall be constructed as part of the Project.

J. The term “identify,” when used in connection with an interrogatory concerning a person or entity means listing the name, address, title, and telephone number for the person or entity. When used in connection with an interrogatory concerning a document, the term “identify” means listing all descriptive information concerning the document including, but not limited to, its title, author, length and date of completion.

K. The term “City” means the “City of Bridgeport” and includes all agencies, boards, committees, commissions, Departments, or Department Heads thereof.

L. The term “PSEG” means PSEG Power Connecticut, LLC.

II. PSEG’S FIRST SET OF INTERROGATORIES TO THE APPLICANTS

1. Identify who at UI and CL&P participated in any way in the preparation of those portions of the application that concern or refer to the Singer Substation.

2. As to each individual or entity identified above, identify, by volume and page number, the portion of the application that the individual or entity was involved in preparing.

3. 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.

4. Provide a copy of all studies conducted by ISO-NE that were reviewed in connection with the preparation of the Application and, in particular, but without limitations, those studies referenced in the following statement that appears at page G-13 on Volume 1 of the Application:

The intermediate terminal points — East Devon Substation in Milford and the Singer Substation in Bridgeport — were selected because studies conducted by ISO-NE identified severe violations of national reliability standards in the Milford and Bridgeport areas.

5. Identify who at UI and CL&P performed any of the analysis necessary to prepare Section H.4 on page H-18, et seq. of the Application and describe each such person's role in such evaluation.

6. Identify who at UI and CL&P participated in any way in the preparation of Section H.5 at pages H-26, et seq. of the Application relative to the proposed route and alternatives of the Middletown-to-Norwalk transmission line and describe each such person's role.

7. Identify who at UI and CL&P participated in any way in the preparation of Sections 1.1 5.3. and 1.1.5.4. at pages 1-18 and 1-19 of the Application relative to the installation of an underground cable system running from the East Devon Substation to

the Singer Substation and from the Singer Substation to the Norwalk Substation and describe each such person's role.

8. Explain whether any of the individuals identified above in response to Interrogatory No. 7 reported, either in writing or orally, any potential problems relating to the reliability of the performance of a 345-kV cable that is installed underground. If so, identify who has expressed such concerns and describe the nature of those concerns. If such concerns are expressed in any writing, provide a copy of such writing.

9. Reference is made to Section 1.1.11.4 at page 1-26 of Volume 1 of the Application and, in particular, the phrase "[I]f another site is ultimately purchased for the Singer Substation . . . the layout described in this section would essentially remain the same." As to that quoted phrase, identify all "other sites", except those identified as Numbers 1 through 11 in the Application, that UI and CL&P has considered for constructing the Singer Substation and the reasons why it has decided not to construct the Singer Substation at any one of those other locations.

10. Identify who at UI and CL&P participated in the preparation of any portion of the application concerning "congestion costs" including the discussion of congestion costs

in Section 1 of Volume 1 of the Application and describe the role played by each such person.

11. Reference is made to footnote 7 on page J-22 of Volume 1 of the Application. Explain why the Bridgeport Energy Generating Facility will maintain its connection to the 115-kV line following construction of the 345-kV line.

12. Explain the basis for the statement on page M-58 of Volume 1 of the Application that “the sound that would be produced by the operation of the proposed [Singer] substation would result in a negligible and likely imperceptible, change in background sound levels at the nearest residences.”

13. Identify and provide a copy of all reports for all noise studies concerning the Singer Substation.

14. Are any of the Native American archaeological sites listed in Table 1a of the Raber Associates report in Volume I of the Application within a one-mile radius of the Singer Substation? If so, please identify which one(s), where they are located, and how far each is from Site 1.

15. Provide the same information as requested in Interrogatory No. 14 for the "significant Historic Resources" listed in Tables 4a, 7a, 8a, and 9a of the Raber Associates report in Volume 1 of the Application.

16. Explain how Raber Associates made the determination which Historic Resources were "Significant" enough to warrant mention in its report. If that determination is contained in any report or document, provide a copy thereof.

17. Identify each factor considered by Power Delivery Consultants, Inc. in preparing the September 30, 2003 report in Volume 1 regarding the reliability of an underground 345-kV cable. As to each factor, describe the nature of the adverse impact each factor would have on the cable and the basis for the conclusion that the underground cable would, nonetheless, reliably operate.

18. 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.

19. 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.

20. 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.

21. In conducting the Site Selection Study did UI and CL&P consider alternative substation configurations that would require a smaller parcel of land for its construction?

a. If so, please describe those configurations.

b. Fully explain why their use was rejected in favor of the configuration described in the Site Selection Study.

c. Did the Applicants consider using a ring bus configuration on sites 2, 3, 4, 5, and 9? If so, provide a detailed explanation of why that configuration at those sites was rejected?

d. Provide a copy of all studies and reports concerning the issues set forth in Interrogatory No. 21.

22. 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?

23. Reference is made to the discussion of Site 1 in the Site Selection Study at page 9 in Volume 6 of the Application. With respect to the statement, "The site was originally recommended by the owner as a possible site for the substation," identify who at PSEG originally recommended this site as a site for the substation? With respect to this alleged recommendation, provide the following information:

a. the name and title of the individual who made the recommendation;

b. when the recommendation allegedly was made;

c. the manner in which the alleged recommendation was made (e.g., in writing, meetings, teleconferences, etc.); and

d. if the alleged recommendation was made during a teleconference or a meeting, identify all participants to such teleconference or meeting and, if the meeting was made in writing, provide copies of all documents reflecting or referring to such recommendations.

24. Fully explain the measures the Applicants have taken to negotiate with PSEG for the purchase of Site 1, including, without limitation, all participants in such negotiations, the dates of such negotiations, and the place where such negotiations were held.

25. Fully explain the basis for the statement at page 9 of the Site Selection Study that, with respect to Site 1, PSEG “has been reluctant to sell the property since its withdrawal of an 18.4 Application at the ISO for increased generation,” including without limitation, all persons at PSEG with whom Applicants or their representatives communicated regarding sale of the property, the dates of such communication and the nature, in detail, of each such communication.

26. Describe all communications UI and/or CL&P have had with Bridgeport Energy concerning the Singer Substation. Provide all documents concerning such communication. Provide copies of all agreements, correspondence, and memoranda of communications between UI and/or CL&P and Bridgeport Energy relative to the construction, use or maintenance of the Singer Substation and/or any future utilization of any portion of the Project by Bridgeport Energy.

27. Reference is made to page 11 of the Site Selection Study contained in Volume 6 of the Application and, in particular, the following statement relative to Site 6, “Plans are in place and approvals have been obtained for the construction of a 25-unit apartment complex and the property was not for sale.” Fully explain how the Applicants determined that the property was not for sale. Provide copies of all correspondence or

other documents reflecting any communications relative to Site 6.

28. 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.

29. Reference is made to page 12 of the Site Selection Study in Volume 6 of the Application and, in particular, the following statement relative to Site 7:

Representatives from the church had communicated their intent to construct a new church building on the property and have rebuffed all further attempts to discuss this site as a possible location for the substation.

Fully explain how the Applicants determined that the church intended to construct a new church on the property including, without limitation, all persons with whom Applicants had any communication, the date of such communication, the name of the Applicants' representative who had such communication, and a summary of each such communication. Provide copies of all correspondence or other documents referring to the church's intent to construct a new building on the property.

30. With respect to the discussion of Site 7, fully explain the basis for the statement, "The owner has refused to sell the property to UI," including, without limitation, all persons with whom Applicants had any communication, the date of such

communication, the name of the Applicants' representative who had such communication, and a summary of each such communication. Provide copies of all correspondence or other documents referring to the owner's refusal to sell the property.

31. Reference is made to page 14 of the Site Selection Study contained in Volume 6 of the Application and, in particular, the following statement made with respect to Site 8, "This site was originally recommended by the owner as a possible site for the substation." Identify who at PSEG made this alleged recommendation. In addition, state the following:

a. when was the alleged recommendation made;

b. where was the alleged recommendation made;

c. how was the alleged recommendation made (e.g., in writing, in a meeting, or in a teleconference); and

d. if the alleged recommendation was made in a meeting or a teleconference, please identify all participants to such meeting or teleconference or, if the alleged recommendation was made in correspondence, provide copies of all correspondence or other documents constituting or reflecting the alleged recommendations.

a. Identify who at UI and/or CL&P has been involved in meetings with Remington Rand, The Bridgeport Port Authority, The Bridgeport Economic Development Corporation, or any other entity relative to the purchase and development of Site 11 as an alternative location for the Singer Substation.

b. Provide copies of all documents constituting or reflecting correspondence concerning the purchase or development of Site 11 as the site for the Singer Substation.

c. Provide copies of all documents relating to the "Estimated Relocation Costs for Remington" as set forth in the charge on page 24 of the Site Selection Study.

d. Fully explain why siting of the substation at Site 11 would require four acres of land, whereas siting at any of the other ten potential sites would require only 2-3 acres.

34. Reference is made to the discussion of Site 11 at page 20 of the Site Selection Study in Volume 6 of the Application. Fully explain the basis for the statement, "the acquisition of ROW for overhead 345-kV line is highly unlikely."

35. Based upon the discussions with The Bridgeport Economic Development Corporation and The Bridgeport Port Authority, how much of the estimated cost of development would be borne by UI and/or CL&P? How much would be borne by the City of Bridgeport or any other entity? How have these amounts been computed?

36. Of the estimated relocation costs for the Remington operation currently sited at Site II, how much of that cost would be borne by UI and/or CL&P? How much of that cost would be borne by Remington? How much of that cost would be borne by the City of Bridgeport or any other entity?

37. Reference is made to Appendix A to the Site Selection Study entitled, "Black & Veatch Report Singer Substation GIF Configuration Option" dated December 13, 2002. Identify who at UI and/or CL&P provided any information in connection with the completion of the Report and a description of the information provided by each and provide a copy of all documents containing such information.

38. Of the eleven sites contemplated in the Site Selection Study, which ones were considered in evaluating the four substation configuration options referenced in Black & Veatch Report?

39. The conclusion of the Black & Veatch report references “five proposed properties” that were considered in evaluating the feasibility of each of the four substation configurations. Identify those five properties. If the remaining six properties discussed in the Site Selection Study were not considered by Black & Veatch in preparing its report, fully explain why those six additional sites were not considered.

40. Other than the four substation configuration options discussed in the Black & Veatch Report, are there any other possible substation configuration models?

a. If so, fully describe each.

b. If so, did Black & Veatch consider those options?

c. Did the Applicants consider those options?

d. If those options were considered, why were they not discussed in the Black & Veatch Report?

e. If those options were not considered, explain why they were not considered by either Black & Veatch or the Applicants.

41. As to the preferred cable route into the Singer Substation and both alternative routes discussed in the Application, provide the following information:

a. Does the discussion of the routes in the Application presuppose siting of the Singer Substation at the corner of Atlantic and Main Street?

b. Did the Applicants consider routes that involved siting of the Singer Substation at a location other than the corner of Atlantic and Main Streets?

c. If such consideration was undertaken, identify who performed any study of such locations and when it was performed.

d. Provide a copy of all documents related to, used in, or referencing such consideration.

42. Reference is made to page D-2, footnote 1 of Volume 1 of the Application. Please produce a copy of all agreements between the Applicants related to their respective ownership of the Project facilities, including, but not limited to, any agreements that relate to the use and ownership of the Singer Substation by the Applicants and/or any other entity.

43. Reference is made to page E-4, Footnote 2 of Volume 1 of the Application, as to all meetings with the City of Bridgeport during the municipal consultation process, please state:

a. When each meeting was held;

b. Who attended;

c. In detail, what was discussed at each such meeting;

d. Did any minutes, notes, correspondence or other documents resulted from or relate to such meeting; and

e. If the answer to d, is yes, please provide a copy of such documents.

44. 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.

45. Reference is made to page J-23 of Volume 1 of the Application. Please state whether any studies were conducted of subsurface conditions at the Site 1 or at any of

the other ten sites referenced in the Application including, but not limited to, to the need for and/or effect of blasting or pile driving in connection with construction of the proposed substation. If the answer is yes, state the date of such studies, who performed them, the methodology thereof, and the results thereof. Provide a copy of such studies or reports.

46. Reference is made to pages 7 and 19 of the Site Selection Study what “expansion” has either Applicant considered in connection with the proposed substation. If any written study, report, or memorandum exists in connection with such “expansion,” please provide a copy thereof.

47. Reference is made to page 12 of the Site Selection Study, in which it states “the site requires a zoning change”. As to the referenced Site 7 and any other site as to which a zoning change would be required, please state whether the Applicants have made any inquiry to the City of Bridgeport or any of its planning or zoning departments, boards or commissions as to the possibility of a zone change or variance, either by application or as a result of any consideration by the City of Bridgeport of its zoning generally.

a. If such inquiries were made, please state:

i. The date of such inquiry;

ii. To whom such inquiry was addressed;

iii. The response to such inquiry; and

iv. If any documents exist regarding such inquiry or the response thereto, please provide a copy thereof.

48. Reference is made to the chart of differential costs set forth on page 23 of the Site Selection Study. Please provide any appraisals or other documents setting forth any of the "costs" set forth on such chart. To the extent that no such documents are available, set forth in detail the method of calculation of such costs, e.g. costs per mile for cable installation, etc. Identify all persons who performed or were contacted regarding such cost determination and state when such computations were made. Provide a copy of the documents used in or relating to such calculations.

49. Reference is made to the chart of Estimated Relocation Costs for Remington, set forth at page 24 of the Site Selection Study. Please fully explain any authority upon which Applicant relies for the assumption that, if the land and/or building at Site 11 is taken by eminent domain, Applicants will be required not only pay for the land and

building, but also to pay an additional expense for the relocation cost for the replacement by Remington of manufacturing and office space.

50. Reference is made to the property identified as "Site 11" in the Site Selection Study. Please state whether any estimates have been obtained for amounts which could be obtained if the portion of that site not used for the substation were sold.

51. Reference is made to the property identified as "Site 11 " in the Site Selection Study. Please state whether any study was made of or consideration was given to taking by eminent domain only such portion of that 11-acre property as would be necessary to accommodate the substation facility, leaving the balance with the current owner. If so, please summarize the results of such consideration, state when it was made, who was involved in its consideration, and the estimated cost of such a limited taking and provide a copy of any documents related thereto.

52. Reference is made to "United Illumination: Singer Substation Site Selection Study: Revision 1: Date: June 24, 2003" ("Revision 1 "), please provide a copy of such study prior to such "Revision 1" thereof.

53. Reference is made to the "Conclusion" of Revision 1, where it states that the "study assumes that sufficient aerial R.O. W. can be obtained to route 115-kV transmission line circuits to Sites #1 and #8 overhead." Please state whether the Applicants have concluded that such R.O.W. can be obtained, describe how it is to be obtained, and provide all documents related to such determination.

54. Please provide a copy of all special acts, charter provisions or other authority which Applicants contend will provide them the right of eminent domain to take the property upon which the substation is to be constructed. Provide a copy of any such charter provisions or authority and a copy of the document filed by United Illuminating with the Secretary of the State of Connecticut on April 2, 1952.

55. Reference is made to the references to "blasting" in pages J-8 through J-9, J-21 through J-25, and K-8 of Volume 1 of the Application. Please state the following:

a. Was any study conducted concerning the potential adverse effects of blasting on each of the eleven potential sites for the Singer Substation?

b. If so, who conducted each such study, when was it conducted, and on what sites was it conducted?

c. State in detail the results of each such study.

d. Provide a copy of all documents, including reports, that discuss such studies and their results.

56. Was any study conducted concerning the adverse effects of pile driving in each of the eleven potential sites for the Singer Substation?

a. If so, who conducted each such study, when was it conducted, and on what sites was it conducted?

b. State in detail the results of each such study.

c. Provide a copy of all documents, including reports, that discuss such studies and their results.

57. Are any of the proposed alternative locations for the Singer Substation located in the coastal zone?

58. What measures will be implemented by the Applicant in the construction and operation of the Singer Substation to protect the State's coastal resources?

59. Have the Applicants conducted an asbestos survey of the warehouse located at Site 1?

a. If so, what were the results of such survey?

b. Please provide a copy of documents and reports that discussed such survey and its results.

c. Have costs of asbestos removal been factored into the Project's costs?

60. Have the Applicants conducted soil and/or groundwater testing or investigation at each of the eleven sites discussed in the Site Selection Study?

a. If so, what are the results of such testing or investigation?

b. Please provide a copy of all documents and reports that discuss such testing or investigation.

c. Have the costs of soil and/or groundwater remediation been factored into the Project costs?

61. Please state whether either Applicant has considered any future plans to construct underwater power transmission lines from the Project to Long Island or to transmit power transported by the Project to Long Island by any means. If the answer is yes, please describe such plans and, if they are referenced in any document, provide a copy thereof.

62. As to each of the eleven sites discussed in the Site Selection Study, list the last date on which the Applicants inquired as to the owner's willingness to sell the property, state who made such inquiry, to whom such inquiry was made, and the result thereof. If any documents exist relating to or arising from such inquiry, provide a copy thereof.

63. Once the Singer Substation is constructed, who will pay for the construction and maintenance of the interconnection between Bridgeport Energy and the substation?

Provide a copy of all interconnection agreements relative to the Singer Substation.

64. Did the Applicants consider siting the substation at any location other than those discussed in the Site Selection Study? If so, which locations?

65. Did the Applicants consider reconfiguring the existing Pequonnock Substation to accommodate the 345-kV cable? If so, please state the following:

- a. Why was this alternative rejected?
- b. Who at UI and/or CL&P was involved in evaluating that alternative?
- c. Please provide copies of all documents that concern that alternative or its consideration.

66. Did the Applicants consider constructing the substation on the parcel of land bounded by Atlantic Street, PSEG's Bridgeport facility and Site 8 across from the main gate to the Bridgeport Energy facility? If so, state the following:

- a. When was it considered?

- b. Who was involved in such consideration?


- c. Why was this alternative rejected?

- d. Who at UI and/or CL&P was involved in evaluating that alternative?

- e. Please provide copies of all documents that concern that alternative or relate to or arise from its consideration and the conclusions thereof

Respectfully submitted,

PSEG POWER CONNECTICUT LLC

A handwritten signature in black ink, appearing to read "D. Relf", is written over a horizontal line.

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Its Attorneys

CERTIFICATION

This is to certify that a copy of the foregoing First Set of Interrogatories to The Connecticut Light & Power Company and The United Illuminating Company has been mailed, via first class mail, postage prepaid, this 11th of February, 2004, to:

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	Northeast Utilities Service Company	Anthony M. Fitzgerald, Esq. Brian T. Henebry, Esq. Carmody & Torrance LLP 50 Leavenworth St., P.O. Box 1110 Waterbury, CT 06721-1110 (203) 573-1200 (203) 575-2600 - fax afitzgerald@carmodylaw.com bhenebry@carmodylaw.com tranmn345docket272@nu.com
Applicant	The United Illuminating Company	Linda L. Randell, Esq. Bruce L. McDermott, Esq. Wiggin & Dana LLP One Century Tower New Haven, CT 06508-1832 (203) 498-4322 (203) 782-2889 - fax lrlandell@wiggin.com bmcdermott@wiggin.com
Intervenor (granted 11/20/03)	Norwalk Association of Silvermine Homeowners	Norwalk Association of Silvermine Homeowners c/o Leigh Grant 99 Comstock Hill Road Norwalk, CT 06850 (203) 846-4577 (203) 846-4577 - fax cartellino@aol.com

<p>Party (granted 11/20/03)</p>	<p>Honorable Robert W. Megna State Representative - 97th District 40 Foxon Hill Road, #54 New Haven, CT 06513 (860) 240-8585 1-800-842-8267 Robert.Megna@po.state.ct.us</p>	
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Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Intervenor (granted 11/20/03)	Honorable Al Adinolfi State Representative 103 rd District 235 Sorghum Mill Drive Cheshire, Connecticut 06410 (203) 272-9701 - Home 1-800-842-1423 – Capitol (860) 240-0207 - fax Alfred.adinolfi@housegop.state.ct.us	
Party (granted 11/20/03)	Town of Middlefield	Eric Knapp, Esq. Branse & Willis, LLC 41-C New London Turnpike Glen Lochen East Glastonbury, CT 06033-2038 (860) 659-3735 (860) 659-9368 – fax eknapp@bransewillis.com
Party (granted 11/20/03)	Town of Milford	Julie Donaldson Kohler, Esq. Hurwitz & Sagarin, LLC 147 North Broad St. Milford, CT 06460 (203) 877-8000 (203) 878-9800 - fax jdk@hurwitz-sagarin.com
Party (granted 11/20/03)	Town of Wallingford	Peter G. Boucher, Esq. Halloran & Sage, LLP 225 Asylum Street Hartford, CT 06103 (860) 297-4650 (860) 548-0006 fax boucher@halloran-sage.com

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Party (granted 11/20/03)	Town of Wallingford continued...	Janis M. Small, Esq. Town Attorney Wallingford Town Hall 45 South Main St. Wallingford, CT 06492 (203) 294-2140 (203) 294-2112 – fax wlfdlaw@snet.net
Party (granted 11/20/03)	Town of Durham	Peter G. Boucher, Esq. Halloran & Sage, LLP 225 Asylum Street Hartford, CT 06103 (860) 297-4650 (860) 548-0006 fax boucher@halloran-sage.com Maryann Boord First Selectwoman Durham Town Hall 30 Townhouse Rd. Durham, CT 06422 (860) 349-3625 (860) 349- 8391 – fax mboord@townofdurhamct.org
Party (granted 11/20/03)	City of Norwalk	Louis S. Ciccarello Corporation Counsel P.O. Box 798 Norwalk, CT 06856-0798 (203) 854-7750 (203) 854-7901 fax lciccarello@norwalkct.org
Party (granted 11/20/03)	Town of Westport	Town of Westport c/o Ira W. Bloom, Esq. 27 Imperial Avenue Westport, CT 06880 (203) 227-9545 (203) 227-2443 - fax ibloom@wsdb.com

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Intervenor (granted 11/20/03)	Honorable Mary G. Fritz State Representative - 90 th District 43 Grove Street Yalesville, CT 06492 (203) 289-1169 1-800-842-1902 (860) 240-0206 - fax mary.fritz@po.state.ct.us	
Party (granted 11/20/03)	Town of Woodbridge	David A. Ball, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604 (203) 337-4134 (203) 576-8504 fax dball@cohenandwolf.com
Party (granted 11/20/03)	City of Meriden	Deborah L. Moore, Esq. Legal Department City Hall 142 East Main Street Meriden, CT 06450 (203) 630-4045 (203) 630-7907 - fax dmoore@ci.meriden.ct.us
Party (granted 11/20/03)	Attorney General Richard Blumenthal	Michael C. Wertheimer Assistant Attorney General Office of the Attorney General 10 Franklin Square New Britain, CT 06051 (860) 827-2603 (860) 827-2893 michael.wertheimer@po.state.ct.us

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Intervenor (granted 11/20/03)	Honorable Raymond Kalinowski State Representative – 100 th District P.O. Box 391 Durham, CT 06422 1(800)842-1423 860) 240-0207 - fax repkalinowski@aol.com	
Party (granted 11/20/03)	City of Bridgeport	Melanie J. Howlett Associate City Attorney Office of the City Attorney 999 Broad Street Bridgeport, CT 06604-4328 (203) 576-7647 (203) 576-8252 – fax Howlem0@ci.bridgeport.ct.us
Party (granted 11/20/03)	Communities for Responsible Energy	Trish Bradley, President Ed Schwartz, Treasurer Comunities for Responsible Energy, Phase II 45 Ironwood Lane Durham, CT 06422 (860) 349-9137 thebradco7@aol.com
Party (granted 11/20/03)	Office of Consumer Counsel	Bruce C. Johnson Litigation Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 (860) 827-2900 (860) 827-2929 – fax bruce.johnson@po.state.ct.us

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Intervenor (granted 11/20/03)	Honorable Themis Klarides State Representative – 114 th District 23 East Court Derby, CT 06418 (203) 735-5911 1-800-842-1423 (860) 240-0207 - fax Themis.klarides@housegop.state.ct.us	
Party (granted 11/20/03)	The Woodlands Coalition for Responsible Energy, Inc.	Lawrence J. Golden, Esq. Pullman & Comley, LLC 90 State House Square Hartford, CT 06103-3702 (860) 424-4346 (860) 424-4370 lgolden@pullcom.com
Intervenor (granted 12/9/03)	ISO New England Inc.	Anthony M. Macleod, Esq. Whitman Breed Abbott & Morgan LLC 100 Field Point Road Greenwich, CT 06830 (203) 869-3800 (203) 869-1951 – fax amacleod@wbamct.com
Party (granted 12/9/03)	Department of Transportation	Arthur W. Gruhn, P.E. Chief Engineer Bureau of Engineering and Highway Operations Department of Transportation 2800 Berlin Turnpike, P.O. Box 317546 Newington, CT 06131-7546 (860) 594-2701 (860) 594-2706 – fax Arthur.gruhn@po.state.ct.us

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Intervenor (granted 12/9/03)	Honorabile John E. Stripp State Representative – 135 th District 4 Scatacook Trail Weston, CT 06883 1(800)842-1423 (860)240-0207 – fax john.stripp@housegop.state.ct.us ~STATUS WITHDRAWN 01/04~	
Party (granted 12/9/03)	Town of Fairfield	Honorabile Kenneth A. Flatto First Selectman Independence Hall 725 Old Post Road Fairfield, CT 06824 (203) 256-3030 (203) 256-3008 – fax firstselectmanffld@town.fairfield.ct.us
Party (granted 12/9/03)	PSEG Power Connecticut LLC	David A. Reif Jane K. Warren Joel B. Casey McCarter & English, LLP CityPlace I Hartford, CT 06103 (860) 275-6700 (860) 724-3397 – fax dreif@mccarter.com jwarren@mccarter.com jcasey@mccarter.com h.borden@pseg.com
Party (granted 12/22/03)	Town of Wilton	Monte E. Frank, Esq. Cohen and Wolf, P.C. 158 Deer Hill Avenue Danbury, CT 06810 (203) 337-4134 (203) 576-8504 fax mfrank@cohenandwolf.com

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Party (granted 12/22/03)	Town of Weston	David A. Ball, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604 (203) 337-4134 (203) 576-8504 fax dball@cohenandwolf.com
Party (granted 12/22/03)	South Central Connecticut Water Authority	Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29th Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-6150 alord@murthalaw.com
Party (granted 12/22/03)	Town of Orange	Mitchell R. Goldblatt First Selectman Town of Orange 617 Orange Center Road Orange, CT 06477-2499 (203) 891-2122 x 737 (203) 891-2185 fax Mitchgoldblatt@aol.com
Intervenor (granted 01/12/04)	Connecticut Business & Industry Association (CBIA)	Robert E. Earley Connecticut Business & Industry Assoc. 350 Church Street Hartford, CT 06103-1106 (860) 244-1900 (860) 278-8562 fax earleyr@cbia.com

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Party (granted 01/12/04)	Town of Cheshire	Richard J. Buturla, Esq. Town Attorney Berchem, Moses & Devlin, PC 75 Broad Street Milford, CT 06460 (203) 783-1200 (203) 878-4912 fax rbuturla@bmdlaw.com mmilone@cheshirect.org
Party (granted 1/12/04)	Town of Hamden	Joaquina Borges King Assistant Town Attorney Hamden Government Center 2750 Dixwell Avenue Hamden, CT 06518 (203) 287-7050 (203) 287-7051 fax jborgesking@hamden.com
Party (approved 2/3/04)	City of Middletown	Timothy P. Lynch Deputy City Attorney City Attorney's Office 245 deKoven Drive, P.O. Box 1300 Middletown, CT 06457-1300 (860) 344-3422 (860) 344-3521 timothy.lynch@cityofmiddletown.com
Party (approved 2/3/04)	Town of Bethany	Honorable Derrylyn Gorski First Selectman Bethany Town Hall 40 Peck Road Bethany, CT 06524-3378 (203) 393-2100 ext. 100 DGorski@Bethany-CT.com Kevin195774@yahoo.com

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Party (approved 2/3/04)	Town of Easton	William J. Kupinse, Jr. First Selectman Easton Town Hall 225 Center Road, P.O. Box 61 Easton, CT 06612 (203) 268-6291 (203) 268-4928 fax w_kupinse@eastonct.org
<i>Intervenor (if approved 2/18/04</i>	<i>Honorable William A. Aniskovich State Senate – 12th District 15 Grove Avenue Branford, CT 06405 (860) 240-0596 William.A.Aniskovich@po.state.ct.us</i>	

<p>Party (approved 2/18/04)</p>	<p><i>Town of North Haven</i></p>	<p><i>David J. Monz Updike, Kelly & Spellacy, P.C. One Century Tower 265 Church Street New Haven, CT 06510 (203) 786-8303 (203) 772-2037 fax dmonz@uks.com</i></p>
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Arthur W. Gruhn, P.E., Chief Engineer
Bur. of Engineering & Highway Operations
Department of Transportation
2800 Berlin Turnpike, P.O. Box 317546
Newington, CT 06131-7546



David A. Reif

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