

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 CONSTRUCTION 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

APRIL 2, 2004

THE TOWNS OF BETHANY, CHESHIRE, DURHAM, EASTON, FAIRFIELD,  
HAMDEN, MIDDLEFIELD, MILFORD, NORTH HAVEN, NORWALK, ORANGE,  
WALLINGFORD, WESTON, WESTPORT, WILTON, AND WOODBRIDGE

FIRST SET OF INTERROGATORIES TO ISO NEW ENGLAND INC.

The above-captioned towns (collectively, the “Towns”), each a party in the above-captioned proceeding, hereby request that ISO New England Inc. (“ISO-

NE”) answer the following interrogatories.<sup>1</sup> The Towns request that ISO-NE provide responses to the interrogatories on or before April 19, 2004.

If there are objections to any of the interrogatories, or if providing responses to particular interrogatories (or portions thereof) would be unduly burdensome, the Towns request that ISO-NE contact the undersigned as soon as possible.

In the event that any interrogatory requests specific data or information that has already been provided in this proceeding, ISO-NE need only specifically identify where the responsive data or information is located in the record.

#### **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, "ISO-NE" means ISO New England Inc. and its present officers and employees.

E. As used in these interrogatories, "Applicants" mean The Connecticut Light & Power Company and The United Illuminating Company, individually or collectively as the case may be.

#### **FIRST SET OF TOWNS' INTERROGATORIES TO ISO-NE**

1. Provide copies of any analyses, assessments, evaluations, reports or studies, prepared by or for ISO-NE, which have addressed or examined how much of the length of the proposed Middletown to Norwalk Project

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<sup>1</sup> The undersigned represent solely the towns of Durham and Wallingford in this proceeding. The undersigned have been authorized to proffer the instant interrogatories on behalf of the Towns.

can be installed underground. Please also provide the workpapers and source documents associated with each such analysis, assessment, evaluation, report or study.

2. Provide copies of any analyses, assessments, evaluations, reports or studies, prepared by or for ISO-NE, which have addressed or examined the impact on the New England electric grid, or any portion(s) thereof, of undergrounding Segments 3 and 4 of the proposed Middletown to Norwalk Project. Please also provide the workpapers and source documents associated with each such analysis, assessment, evaluation, report or study.
3. Provide copies of any analyses, assessments, evaluations, reports or studies, prepared by or for ISO-NE, which have addressed or examined the impact on the New England electric grid, or any portion(s) thereof, of undergrounding any of the proposed line in Segments 1 and 2 of the proposed Middletown to Norwalk Project.
4. Provide copies of all correspondence between the Applicants and ISO-NE which addressed or discussed the undergrounding of any portion(s) of the proposed Middletown to Norwalk Project. Any materials included in the Application, the December 2003 Supplemental Filing or the Addendums to that Supplemental Filing need not be provided.
5. Provide copies of any documents provided to ISO-NE by the Applicants which have addressed the undergrounding of any portion(s) of the proposed Middletown to Norwalk Project. Any materials included in the Application, the December 2003 Supplemental Filing or the Addendums to that Supplemental Filing need not be provided.
6. Specify in detail any factors and quantify any criteria that ISO-NE believes need to be considered when determining what length of the proposed Middletown to Norwalk Project can be installed underground.
7. Reference the ISO-NE Southwest Connecticut Study Group report that was provided in Addendum #3 to the Applicants' Supplemental Filing.
  - a. Please state whether the modeling of the East Shore Alternative performed for the ISO-NE Study Group also reflected the system changes described at page 5 of the December 31, 2003 PowerGEM Report attached to Addendum #1 to the Applicants' Supplemental Filing.
  - b. In particular, please explain whether the rating of the East Shore to Scovill Rock 345 kV line was increased in this modeling the reflect the reconfiguring of the East Shore substation and the removal of the 345/115 kV autotransformers from the 387 line path. If the answer is no, please explain why not.

Respectfully submitted,

THE TOWNS OF BETHANY,  
CHESHIRE, DURHAM, EASTON,  
FAIRFIELD, HAMDEN,  
MIDDLEFIELD, MILFORD,  
NORTH HAVEN, NORWALK,  
ORANGE, WALLINGFORD,  
WESTON, WESTPORT, WILTON,  
AND WOODBRIDGE

BY \_\_\_\_\_

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### Certification

I hereby certify that a copy of the foregoing has been mailed, e-mailed and/or hand-delivered to all known parties and intervenors of record this 2nd day of April, 2004.

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