

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

FEBRUARY 23, 2004

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

THIRD SET OF INTERROGATORIES  
TO THE CONNECTICUT LIGHT AND POWER COMPANY  
AND THE UNITED ILLUMINATING COMPANY

The above-captioned municipalities (collectively, the “Municipalities”),  
each a participant in the above-captioned proceeding, hereby request that The  
Connecticut Light & Power Company (“CL&P”) and The United Illuminating

Company ("UI") answer the following interrogatories. CL&P and UI are sometimes hereinafter referred to individually as a "Respondent" and collectively as the "Respondents."<sup>1</sup> The interrogatories are addressed to both of the Respondents; the Municipalities request that the Respondents answer the interrogatories on or before March 10, 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 Municipalities request that the Respondents 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, the Respondent or Respondents answering the interrogatory 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, "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.

---

<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 Municipalities.

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.

**MUNICIPALITIES' THIRD SET OF INTERROGATORIES TO CL&P/UI**

1.
  - a. Please state whether, in the opinion of CL&P and UI, it would be technically feasible to add a new East-West path into Southwestern Connecticut by constructing a 345 kV transmission line directly from Millstone to the East Shore Substation in place of building the section of the proposed Middletown to Norwalk Project from Oxbow Junction to Beseck Substation and rebuilding/reinforcing the existing 387 line from East Wallingford Junction to the East Shore Substation. This Millstone-East Shore line would connect with the alternative line from East Shore to East Devon that has been examined as part of what the Companies have called the Town of Wallingford alternative.
  - b. Please identify what, in the opinions of CL&P and/or UI, would be the adverse reliability impacts of adding a new East-West path into Southwestern Connecticut by constructing a 345 kV transmission line directly from Millstone to the East Shore Substation as envisioned in part a. of this question and then connecting to a new line from the East Shore to the East Devon substations as presented in the Companies' supplemental filings.
  - c. Please state whether CL&P and/or UI have studied or examined the economic, technical, reliability or construction feasibility of bringing a 345 kV transmission line from Millstone to the East Shore Substation, or any other location in the New Haven area, within the I-95 or the railroad corridors, or by any other direct route.
  - d. If the answer to part c. is yes, please provide copies of all such analyses, assessments, evaluations and studies, including computer-readable PTI-compatible load flow SAV files reflecting the system with and without the referenced 345 kV reinforcement, and both of these with and without contingencies.
  - e. If the answer to part c. is no, please explain in detail why such an alternative has not been examined or studied.
2. Please provide a computer readable copy of the ATP/EMTP program, and all relevant user instructions, model documentation, and ancillary

- programs, that were used by GE to perform the studies referenced in pages 4-8 of the Supplemental Filing dated December 16, 2003.
3. Please provide a computer-readable copy of the input data to the ATP/EMTP program used by GE to perform the studies referenced in pages 4-8 of the Supplemental Filing dated December 16, 2003.
  4. Please provide a copy of the ATP/EMTP model output produced by GE in the performance of the studies referenced in pages 4-8 of the Supplemental Filing dated December 16, 2003.
  5. Reference the January 30, 2004 Addendum #2 to the December 16, 2003 Supplemental Filing by CL&P and UI. Provide on CD in PTI-compatible machine readable format, the input data and results for each of the analyses discussed in the Addendum and Attachments Nos. 1, 2, 3 and 4. Please provide in .RAW format and in .SAV format.
  6. Reference page 12 of the December 16, 2003 Supplemental Filing. Provide on CD in PTI-compatible machine readable format, the input data and results which evaluated the 387 line as part of the SWCT 345-kV loop. Please provide in .RAW format and in .SAV format.
  7.
    - a. Reference page 11 of the December 16, 2003 Supplemental Filing. Please state whether what the companies' have termed the Town of Wallingford alternative has been analyzed with an all underground configuration between the East Shore Substation and the East Devon Substation.
    - b. If the answer to part a. is yes, provide on CD in PTI-compatible machine readable format, the input data and results for such analyses. Please provide in .RAW format and in .SAV format.
    - c. If the answer to part a. is no, please explain why this all underground configuration has not been analyzed.

Respectfully submitted,

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

BY \_\_\_\_\_

Peter G. Boucher  
Alan P. Curto  
Halloran & Sage LLP  
225 Asylum Street  
Hartford, CT 06103  
Tel: (860) 522-6103  
Fax: (860) 548-0006  
Their Attorneys

## **CERTIFICATION**

This is to certify that a copy of the foregoing has been mailed, first class postage prepaid, on the above date to:

Robert E. Earley  
Connecticut Business & Industry  
Assoc.  
350 Church Street  
Hartford, CT 06103

Honorable Raymond Kalinowski  
State Representative  
100<sup>th</sup> District  
PO Box 391  
Durham, CT 06422

Office of Consumer Counsel  
Bruce C. Johnson  
Litigation Attorney  
Office of Consumer Counsel  
Ten Franklin Square  
New Britain, CT 06051

Honorable John E. Stripp  
State Representative – 135<sup>th</sup> District  
4 Scatacook Trail  
Weston, CT 06883

Honorable Themis Klarides  
State Representative 114 District  
23 East Court  
Derby, CT 06418

Trish Bradley, President  
Ed Schwartz, Treasurer  
Communities for Responsible  
Energy,  
Phase II  
45 Ironwood Lane  
Durham, CT 06422

Honorable Robert W. Megna  
State Representative  
97<sup>th</sup> District  
40 Foxon Hill Road, #54  
New Haven, CT 06513

Department of Transportation  
Arthur W. Gruhn, P.E.  
Chief Engineer  
Bureau of Engineering  
and Highway Operations  
Department of Transportation  
2800 Berlin Turnpike  
PO Box 317546  
Newington, CT 06131

Honorable Al Adinolfi  
State Representative  
103<sup>rd</sup> District  
235 Sorghum Mill Drive  
Cheshire, CT 06410

Harold W. Borden  
Vice President and General Counsel  
PSEG Power Connecticut LLC  
80 Park Plaza  
Newark, NJ 07102-4194

Honorable Mary G. Fritz  
State Representative  
90<sup>th</sup> District  
43 Grove Street  
Yalesville, CT 06492

South Central Connecticut Water  
Authority  
Andrew W. Lord, Esq.  
Murtha Cullina LLP  
CityPlace I, 29<sup>th</sup> Floor  
185 Asylum Street  
Hartford, CT 06103

Northeast Utilities Service Company  
Anthony M. Fitzgerald, Esq.  
Brian T. Henebry, Esq.  
Carmody & Torrance LLP  
50 Leavenworth Street  
PO Box 1110  
Waterbury, CT 06721

City of Bridgeport  
Melanie J. Howlett  
Associate City Attorney  
Office of the City Attorney  
999 Broad Street  
Bridgeport, CT 06604

Town of Cheshire  
Richard J. Buturla, Esq.  
Town Attorney  
Berchem, Moses & Devlin, PC  
75 Broad Street  
Milford, CT 06460

Town of Fairfield  
Honorable Kenneth A. Flatto  
First Selectman  
Independence Hall  
725 Old Post Road  
Fairfield, CT 06824

Town of Hamden  
Joaquina Borges King  
Assistant Town Attorney  
Hamden Government Center  
2750 Dixwell Avenue  
Hamden, CT 06518

City of Meriden  
Deborah L. Moore, Esq.  
Legal Department  
City Hall  
142 East Main Street  
Meriden, CT 06450

Town of Middlefield  
Eric Knapp, Esq.  
Branse & Willis, LLC  
41-C New London Turnpike  
Glen Lochen East  
Glastonbury, CT 06033-2038

Town of Milford  
Julie Donaldson Kohler, Esq.  
Hurwitz & Sagarin, LLC  
147 North Broad Street  
Milford, CT 06460

Town of Orange  
Mitchell R. Goldblatt  
First Selectman  
Town of Orange  
617 Orange Center Road  
Orange, CT 06477

Town of Wallingford  
Janis M. Small, Esq.  
Town Attorney  
Wallingford Town Hall  
45 South Main Street  
Wallingford, CT 06492

Town of Westport  
c/o Ira W. Bloom, Esq.  
27 Imperial Avenue  
Westport, CT 06880

Town of Wilton  
Monte E. Frank, Esq.  
Cohen and Wolf, P.C.  
158 Deer Hill Avenue  
Danbury, CT 06810

David A. Ball, Esq.  
Cohen and Wolf, P.C.  
1115 Broad Street  
PO Box 1821  
Bridgeport, CT 06601-1821

Lawrence J. Golden, Esq.  
Pullman & Comley, LLC  
90 State House  
Hartford, CT 06103-3702

Attorney General Richard  
Blumenthal  
c/o Michael C. Wertheimer  
Assistant Attorney General  
Office of the Attorney General  
10 Franklin Square  
New Britain, CT 06051

Linda L. Randell, Esq.  
Bruce L. McDermott, Esq.  
Wiggin & Dana, LLP  
One Century Tower  
New Haven, CT 06508-1832

Anthony M. Macleod, Esq.  
Whitman Breed Abbott & Morgan  
LLC  
100 Field Point Road  
Greenwich, CT 06830

City of Norwalk  
Louis S. Ciccarello  
Corporation Counsel  
Norwalk City Hall  
P.O. Box 798  
Norwalk, CT 06856-0798

Norwalk Association of Silvermine  
Homeowners  
c/o Leigh Grant  
99 Comtock Hill Road  
Norwalk, CT 06850

David A. Reif  
Jane K. Warren  
Joel B. Casey  
McCarter & English, LLP  
CityPlace I  
Hartford, CT 06103

Timothy P. Lynch  
Deputy City Attorney  
245 deKoven Drive  
PO Box 1300  
Middletown, CT 06457

Honorable Derrylyn Gorski  
First Selectman  
Bethany Town Hall  
40 Peck Road  
Bethany, CT 06524

William J. Kupinse, Jr.  
First Selectman  
Easton Town Hall  
225 Center Road  
PO Box 61  
Easton, CT 06612

Honorable William A. Aniskovich  
State Senate - 12<sup>th</sup> District  
15 Grove Avenue  
Branford, CT 06405

David J. Monz  
Updike, Kelly & Spellacy, P.C.  
One Century Tower  
265 Church Street  
New Haven, CT 06510

---

Peter G. Boucher



518696.1(HSFP)