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Office of The Attorney General  
State of Connecticut

December 19, 2003

Derek S. Phelps  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051



**Re: Docket No. 272**

Dear Mr. Phelps:

Enclosed please find the Attorney General's First Set of Interrogatories to the Connecticut Light and Power Company in the above referenced docket.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Michael C. Wertheimer".

Michael C. Wertheimer  
Assistant Attorney General

MCW/jks  
Enclosure

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

THE CONNECTICUT LIGHT AND POWER	:	DOCKET NO. 272
COMPANY AND THE UNITED	:	
ILLUMINATING COMPANY APPLICATION	:	
FOR A CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION OF A NEW 345-KV	:	
ELECTRIC TRANSMISSION LINE AND	:	
ASSOCIATED FACILITES BETWEEN THE	:	
SCOVILLE ROCK SWITCHING STATION IN	:	
MIDDLETOWN AND THE NORWAL	:	
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	:	
WALLINFORD, 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	:	DECEMBER 19, 2003

**ATTORNEY GENERAL'S FIRST SET OF INTERROGATORIES  
TO THE CONNECTICUT LIGHT AND POWER COMPANY**

Richard Blumenthal, Attorney General for the State of Connecticut, hereby requests that the Connecticut Light and Power Company and the United Illuminating Company answer the following interrogatories in the above-captioned proceeding no later than January 5, 2004. In the event that the information requested herein has been provided in this proceeding, the respondents 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, "concern" and "concerning" mean "relate," "relating," "refer," "referring," "reflect," "reflecting," "about," "constitute" or "constituting."

**E.** As used in these interrogatories, "CL&P" means the Connecticut Light and 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 interpreted 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, "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 interpreted 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.

**G.** As used in these interrogatories, "Applicants" refers to CL&P and UI.

**H.** As used in these interrogatories, "document" means all materials and tangible forms of expression in any of the Applicants' 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, graphs, computer printouts, receipts, schedules, itineraries, declarations, affirmations, affidavits, deposition transcripts or other sworn, affirmed or unsworn statements, scripts, press releases, minutes, summaries, analyses, correspondence, memoranda, work papers, ledger sheets, confirmations, cables, wires, telecopies, facsimiles, telegrams, telexes, telephone logs, notes or records of conversations or meeting, contracts, agreements, notices or advertisements.

## **II. INTERROGATORIES**

**AG-1.** Identify all schools that are located within 1200 feet of the right of way or proposed limit of the right of way for the 345 kV transmission line proposed in this proceeding. For the purposes of this question, the term “schools” includes public schools, private schools and pre-schools and the playgrounds, playing fields, parking lots and similar property associated with the schools.

**AG-2.** For every school identified in response to question AG-1:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe all efforts made by the Applicants to mitigate the impact of the proposed 345 kV transmission line upon the school in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values. Also provide all documents concerning those efforts; and
- c. identify its proximity to the nearest substation.

**AG-3.** Identify all community centers that are located within 1200 feet of the right of way or proposed limit of the right of way for the 345 kV transmission line proposed in this proceeding. For the purposes of this question, the term “community centers” includes public and private centers as well as the playing fields, parking lots and similar property associated with the facilities.

**AG-4.** For every community center identified in response to question AG-3:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe all efforts made by the Applicants to mitigate the impact of the proposed 345 kV transmission line upon the community center in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values. Also provide all documents concerning those efforts; and
- c. identify its proximity to the nearest substation.

**AG-5.** Identify all hospitals that are located within 1200 feet of the right of way or proposed limit of the right of way for the 345 kV transmission line proposed in this proceeding. For the purposes of this question, the term “hospitals” includes the parking lots and similar property associated with the facilities.

**AG-6.** For every hospital center identified in response to question AG-5:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe all efforts made by the Applicants to mitigate the impact of the proposed 345 kV transmission line upon the hospital in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values. Also provide all documents concerning those efforts; and
- c. identify its proximity to the nearest substation.

**AG-7.** Identify all public parks that are located within 1200 feet of the right of way or proposed limit of the right of way for the 345 kV transmission line proposed in this proceeding.

**AG-8.** For every public park identified in response to question AG-7:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe all efforts made by the Applicants to mitigate the impact of the proposed 345 kV transmission line upon the public park in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property value. Also provide all documents concerning those efforts; and
- c. identify its proximity to the nearest substation.

**AG-9.** Identify all nursing homes, senior citizens' homes and extended care facilities that are located within 1200 feet of the right of way or proposed limit of the right of way for the 345 kV transmission line proposed in this proceeding. For the purposes of this question, the terms "nursing homes," "senior citizens' homes" and "extended care facilities" include the parking lots and similar property associated with the facilities.

**AG-10.** For every nursing home, senior citizens' home and extended care facility identified in response to question AG-9:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe all efforts made by the Applicants to mitigate the impact of the proposed 345 kV transmission line upon the nursing home, senior citizens' home or extended care facility in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property values. Also provide all documents concerning those efforts; and
- c. identify its proximity to the nearest substation.

**AG-11.** Identify all houses of worship that are located within 1200 feet of the right of way or proposed limit of the right of way for the 345 kV transmission line proposed in this proceeding.

**AG-12.** For every house of worship identified in response to question AG-11:

- a. specify the distance from the right of way and the extent to which it is in the right of way;
- b. describe all efforts made by the Applicants to mitigate the impact of the proposed 345 kV transmission line upon the house of worship in any manner, including: the impact of electric and magnetic fields; and the impacts upon aesthetics and property value. Also provide all documents concerning those efforts; and
- c. identify its proximity to the nearest substation.

**AG-13.** Refer to the portion of page 7 of the Applicants' Supplemental Filing in this proceeding dated December 16, 2003 which states:

[a]s the Companies noted in the Application (Volume 1 and p. H-51), it would be preferable from an operating standpoint to minimize the underground construction of 345-kV transmission lines. In cases such as the portion of the Companies' proposed route between East Devon and Norwalk, *operational complexity was accepted in order to accommodate significant social and land use impacts that would have been associated with overhead construction.* These impacts are avoided by underground construction between East Devon and Norwalk, *at minimal additional cost compared to overhead construction.*

(Emphasis added).

- a. Describe the "significant social and land use impacts that would have been associated with overhead construction" from East Devon to Norwalk. Also provide all documents concerning those impacts.
- b. Provide a comprehensive comparison of the cost of overhead construction and underground construction of the proposed 345 kV line between East Devon and Norwalk. Please include in this comparison the estimated costs associated with acquiring any additional right of way that may be required for overhead construction.
- c. Define the term "operational complexity" as it is used in this portion of the Supplemental Filing.
- d. Describe whether and how the "operational complexity" associated with underground construction as described in this portion of the Supplemental Filing will impact the safe and reliable operation of the proposed 345 kV line.