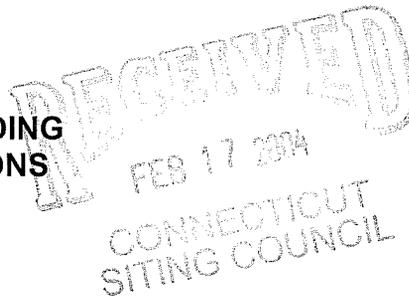


STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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 17, 2004

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

SECOND 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."¹ The interrogatories are addressed to both of the Respondents; the Municipalities request that the Respondents answer the interrogatories on or before March 2, 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.

¹ 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' SECOND SET OF INTERROGATORIES TO CL&P/UI

1. Reference the Exponent "Electric and Magnetic Field Assessment: Middletown-Norwalk Transmission Reinforcement" ("the Exponent EMF Assessment") included in Volume 6 of the Application.
 - a. Please state whether it is Exponent's position that no adverse effects on human health or cancer can be caused by prolonged exposure to EMF of any magnitude.
 - b. If the answer to part a. of this question is no, please specify the magnitude of the magnetic field (in milligauss), i.e., what levels of EMF, that could have adverse effects on human health, compromise normal function, or cause cancer.
 - c. Please provide the health and scientific studies which form the basis for the answer to part b. of this question.
2. Please indicate whether the proposed magnetic fields (mG) presented on Tables 5, A-1, A-2, and A-3 in the Exponent EMF Assessment reflect the total magnetic field from all of the transmission lines, including the proposed 345-kV line, that would be within the same right-of-way or only the magnetic field from the proposed 345-kV line.
3. Reference pages 23 and 24 of the Exponent EMF Assessment. If the projected peak load is 27 GW and the average load is 15 GW, specify how many hours of the year the New England load would exceed 15 GW.
4. Reference pages 23 and 24 of the Exponent EMF Assessment.
 - a. Provide the workpapers and input and output data files, in Excel readable format, for the "15 GW Case" and the "27 GW Case" modeled by NU.
 - b. Specify each of the assumptions made by NU concerning the availability of other transmission lines and the operability of generating facilities for this modeling.
 - c. Specify which generators are assumed to be dispatched in the 15 GW and 27 GW cases modeled by NU.

- d. Specify the loadings in MVA of the proposed 345-kV line calculated in the 15 GW and the 27 GW cases.
 - e. Specify the loads assumed in the 15 GW and the 27 GW cases for the Connecticut, Southwestern Connecticut and Norwalk-Stamford sub-areas of New England.
 - f. Specify what CL&P and UI believe are reasonable estimates of future demand growth rates for New England for the years after 2007.
 - g. Specify what CL&P and UI believe are reasonable estimates of future demand growth rates for the State of Connecticut for the years after 2007.
 - h. Specify what CL&P and UI believe are reasonable estimates of future demand growth rates for Southwestern Connecticut for the years after 2007.
 - i. Specify what CL&P and UI believe are reasonable estimates of future demand growth rates for the Norwalk-Stamford sub-area for the years after 2007.
5. Reference Table 5 in the Exponent EMF Assessment. Provide the proposed magnetic fields for the East/South ROW and the West/North ROW in each Cross Section under the assumption that the proposed 345-kV line is loaded at 80 percent of its normal MVA rating.
 6. Reference Table 5 in the Exponent EMF Assessment. Provide the proposed magnetic fields for the East/South ROW and the West/North ROW in each Cross Section under the assumption that the proposed 345-kV line is loaded at 100 percent of its normal MVA rating.
 7. Reference Table 5 in the Exponent EMF Assessment.
 - a. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 8.6 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
 - b. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 8.6 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
 - c. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 9.6 mG would not have adverse effects on human health, compromise normal function, or cause cancer.

- d. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 9.6 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- e. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 11.4 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- f. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 11.4 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- g. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 13.8 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- h. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 13.8 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- i. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 17.3 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- j. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 17.3 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- k. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 19.8 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- l. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field

of 19.8 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.

- m. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 21.5 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- n. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 21.5 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- o. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 28.3 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- p. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 28.3 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- q. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 31.0 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- r. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 31.0 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- s. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 31.5 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- t. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 31.5 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the

specific statements, tables and findings in each such study which support this conclusion.

8. Reference Table A-1 in the Exponent EMF Assessment.
 - a. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 25.3 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
 - b. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 25.3 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
 - c. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 30.7 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
 - d. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 30.7 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
 - e. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 96.5 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
 - f. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 96.5 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
9. Reference Table A-3 in the Exponent EMF Assessment.
 - a. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 10.7 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
 - b. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 10.7 mG would not have adverse effects on human health,

compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.

- c. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 12.0 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- d. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 12.0 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- e. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 16.3 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- f. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 16.3 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- g. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 17.1 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- h. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 17.1 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- i. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 28.1 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- j. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 28.1 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the

specific statements, tables and findings in each such study which support this conclusion.

- k. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 38.0 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- l. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 38.0 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- m. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 39.4 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- n. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 39.4 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- o. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 39.9 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- p. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 39.9 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- q. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 41.2 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- r. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 41.2 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.

- s. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 44.7 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- t. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 44.7 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- u. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 45.0 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- v. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 45.0 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- w. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 49.5 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- x. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 49.5 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- y. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a magnetic field of 58.4 mG would not have adverse effects on human health, compromise normal function, or cause cancer.
- z. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 58.4 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
- aa. Describe the evidence that, in the opinion of Exponent, CL&P and UI, would support the conclusion that long-term exposure to a

magnetic field of 58.8 mG would not have adverse effects on human health, compromise normal function, or cause cancer.

- bb. Provide copies of the health and scientific studies which form the basis for the conclusion that long-term exposure to a magnetic field of 58.8 mG would not have adverse effects on human health, compromise normal function, or cause cancer. Please identify the specific statements, tables and findings in each such study which support this conclusion.
10. Reference Attachment 1 to the response to AG Interrogatory AG-013.
- a. Identify the 5 structures in Milford and the structure in Wallingford that must be “addressed.” Please also explain what is meant by the term “addressed.”
 - b. Indicate the number of schools in each town which abut the ROW for the OH portion of the “Primary Route Under Consideration – Scovill Rock to East Devon” and the “Additional Portion of All Overhead Alternative B Route – East Devon to Norwalk.”
 - c. Indicate the number of camps in each town which abut the ROW for the OH portion of the “Primary Route Under Consideration – Scovill Rock to East Devon” and the “Additional Portion of All Overhead Alternative B Route – East Devon to Norwalk.”
 - d. Indicate the number of places of worship in each town which abut the ROW for the OH portion of the “Primary Route Under Consideration – Scovill Rock to East Devon” and the “Additional Portion of All Overhead Alternative B Route – East Devon to Norwalk.”
11. Provide copies of each of the health and scientific studies discussed or included as references in the Exponent EMF Assessment.

Respectfully submitted,

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

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CERTIFICATION

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

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A handwritten signature in black ink, appearing to read 'Peter G. Boucher', written over a horizontal line.

Peter G. Boucher