

STATE OF CONNECTICUT

SITING COUNCIL

Re: The Connecticut Light and Power Company : Docket 272  
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 :  
Facilities Between Scovill Rock Switching :  
Station in Middletown and Norwalk :  
Substation in Norwalk, Connecticut :  
Including the Reconstruction of Portions of :  
Existing 115-kV and 345-kV Electric :  
Transmission Lines, the Construction of the : MAY 25, 2004  
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 :

**RESPONSES TO FIRST SET OF INTERROGATORIES OF THE  
CONNECTICUT LIGHT AND POWER COMPANY DIRECTED TO  
CITY OF MILFORD**

The City of Milford hereby responds to the First Set of Interrogatories of the Connecticut Light and Power Company dated March 8, 2004. The City shall supplement these responses as new experts are identified or studies are completed.

**INTERROGATORIES:**

1. Identify the name and address of each expert witness for whom you intend to present pre-filed testimony and/or make available for cross-examination at the hearings in this docket.

**Response:** Christopher Allan and Thomas Ryder  
Land-Tech Consultants, Inc.  
205 Playhouse Corner  
Southbury, CT 06488

- 2. Provide a copy of all reports, analyses, and studies prepared by such expert regarding the Middletown to Norwalk Project.**

**Response:** The report of Land-Tech Consultants, Inc. ("Land-Tech") is attached to its pre-filed testimony dated May 24, 2004.

- 3. Provide a copy of all documents, data or other information considered by the expert in forming his/her opinions in this matter, other than any documents, data or information already filed or previously produced by CL&P and/or UI in this docket. With regard to such documents, data or information already filed or previously produced by CL&P and/or UI in this docket (and relied upon by the expert) provide a listing of all such documents, data, or information.**

**Response:** The documents, data or other information considered by Land-Tech are contained or referenced in its report dated May 24, 2004.

- 4. Provide in both electronic and hard copy form any and all results of system modeling performed by the expert in connection with this docket, including both the model used and the input data.**

**Response:** Land-Tech did not perform system modeling.

- 5. Provide a copy of any and all exhibits to be used as a summary of or in support of the expert's opinions and testimony.**

**Response:** Land-Tech will offer a visual representation of the information contained in its report dated May 24, 2004 during the hearings scheduled on this issue. The visual representation will be a color graphic compiled from GIS data showing the affected portion of Milford including the CL&P right of way, Eisenhower Park, roads, topography, wetlands, waterbodies, and NDDB sites. The exhibit is expected to be approximately 30" by 40" in size and the City therefore requests bulk filing on the day of the hearing.

- 6. Provide a complete listing of the qualifications of the expert, including a list of all publications authored by the expert in the last 10 years.**

**Response:** The qualifications of Mr. Allan and Mr. Ryder and publication lists are contained in Land-Tech's report dated May 24, 2004.

CITY OF MILFORD



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## CERTIFICATION

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

<p>Applicant: Northeast Utilities Service Company</p> <p>Anthony M. Fitzgerald, Esq. Brian T. Henebry, Esq. Carmody &amp; Torrance LLP 50 Leavenworth Street P.O. Box 1110 Waterbury, CT 06721-1110 (203) 573-1200 (203) 575-2600 – fax</p>	<p>Applicant: The United Illuminating Company</p> <p>Linda L. Randell, Esq. Bruce L. McDermott, Esq. Wiggin &amp; Dana LLP One Century Tower New Haven, CT 06508-1832 (203) 498-4322 (203) 782-2889 – fax</p>	<p>Intervenor: Norwalk Association of Silvermine Homeowners</p> <p>Norwalk Associates of Silvermine Homeowners c/o Leigh Grant 99 Comstock Hill Road Norwalk, CT 06850 (203) 846-4577 (203) 846-4577</p>
<p>Party:</p> <p>Honorable Robert W. Megna State Representative – 97<sup>th</sup> District 40 Foxon Hill Road, #54 New Haven, CT 06513 (203) 240-8585 (800) 842-8267</p>	<p>Intervenor:</p> <p>Honorable Al Adinolfi State Representative 103<sup>rd</sup> District 235 Sorghum Mill Drive Cheshire, CT 06410 (203) 272-9701 (800) 842-1423 (860) 240-0207 - fax</p>	<p>Party: Town of Middlefield</p> <p>Eric Knapp, Esq. Branse &amp; Willis, LLC 41-C New London Turnpike Glen Lochen East Glastonbury, CT 06033-2038 (860) 659-3735 (860) 659-9368 - fax</p>
<p>Party: Town of Wallingford</p> <p>Peter G. Boucher, Esq. Halloran &amp; Sage, LLP 225 Asylum Street Hartford, CT 06103 (860) 297-4650 (860) 548-0006 - fax</p>	<p>Town of Wallingford cc:</p> <p>Janis M. Small, Esq. Town Attorney Wallingford Town Hall 45 South Main Street Wallingford, CT 06492 (203) 294-2140 (203) 294-2112 - fax</p>	<p>Party: City of Norwalk:</p> <p>Louis S. Ciccarello Corporation Counsel P.O. Box 798 Norwalk, CT 06856-0798 (203) 854-7750 (203) 854-7901 - fax</p>
<p>Party: Town of Durham:</p> <p>Peter G. Boucher, Esq. Halloran &amp; Sage, LLP 225 Asylum Street Hartford, CT 06103 (860) 297-4650 (860) 548-0006 - fax</p>	<p>Town of Durham cc:</p> <p>Maryann Boord First Selectwoman Durham Town Hall 30 Townhouse Road Durham, CT 06422 (860) 349-3625 (860) 349-8391 - fax</p>	<p>Party: Town of Woodbridge</p> <p>David A. Ball, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604 (203) 337-4134 (203) 576-8504 – fax</p>

<p>Party: Town of Westport</p> <p>Town of Westport c/o Ira W. Bloom, Esq. 27 Imperial Avenue Westport, CT 06680 (203) 227-9545 (203) 227-2443 – fax</p>	<p>Intervenor:</p> <p>Honorable Mary G. Fritz State Representative – 90<sup>th</sup> District 43 Grove Street Yalesville, CT 06492 (203) 289-1169 (800) 842-1902 (860) 240-0206 - fax</p>	<p>Intervenor:</p> <p>Honorable Raymond Kalinowski State Representative – 100<sup>th</sup> District P.O. Box 391 Durham, CT 06422 (800) 842-1423 (860) 240-0207 - fax</p>
<p>Party: City of Meriden</p> <p>Deborah L. Moore, Esq. Legal Department City Hall 142 East Main Street Meriden, CT 06450 (203) 630-4045 (203) 630-7907 - fax</p>	<p>Party:</p> <p>Atty. General Richard Blumenthal</p> <p>Michael C. Wertheimer Assistant Attorney General Attorney General's Office 10 Franklin Square New Britain, CT 06051 (860) 827-2603 (860) 827-2983</p>	<p>Party: Office of Consumer Counsel</p> <p>Bruce C. Johnson Litigation Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 (860) 827-2900 (860) 827-2929 – fax</p>
<p>Party: City of Bridgeport</p> <p>Melanie J. Howlett Associate City Attorney City of Bridgeport 999 Broad Street Bridgeport, Connecticut 06604-4328 (203) 576-7647 (203) 576-8252 – fax</p>	<p>Party: Communities for Responsible Energy:</p> <p>Trish Bradley, President Ed Schwartz, Treasurer Communities for Responsible Energy, Phase II 45 Ironwood Lane Durham, CT 06422 (860) 349-9137</p>	<p>Intervenor: ISO New England Inc.</p> <p>Anthony M. Macleod, Esq. Whitman Breed Abbott &amp; Morgan LLC 100 Field Point Road Greenwich, CT 06830 (203) 869-3800 (203) 869-1951 – fax</p>
<p>Intervenor:</p> <p>Honorable Themis Klarides State Representative – 114<sup>th</sup> District 23 East Court Derby, CT 06418 (203) 735-5911 (800) 842-1423 (860) 240-0207 – fax</p>	<p>Party: The Woodlands Coalition for Responsible Energy</p> <p>Lawrence J. Golden, Esq. Pullman &amp; Comley, LLC 90 State House Square Hartford, CT 06103-3702 (860) 424-4346 (860) 424-4370</p>	<p>Party: PSEG Power Connecticut LLC</p> <p>David A. Reif Jane K. Warren Joel B. Casey McCarter &amp; English, LLP CityPlace I Hartford, CT 06103 (860) 275-6700 (860) 724-3397 – fax</p>

<p>Party: Department of Transportation</p> <p>Charles H. Walsh Assistant Attorney General 55 Elm St., P.O. Box 120 Hartford, CT 06141-0120 (860) 808-5090 (860) 808-5384 - fax</p>	<p>Party: Town of Fairfield</p> <p>Honorable Kenneth A. Flatto First Selectman Independence Hall 725 Old Post Road Fairfield, CT 06824 (203) 256-3030 (203) 256-3008 - fax</p>	<p>Party: South Central Connecticut Water Authority</p> <p>Andrew W. Lord Murtha Cullina LLP CityPlace I, 29<sup>th</sup> Floor 185 Asylum Street Hartford, Connecticut 06103-3469 (860) 240-6180 (860) 240-6150</p>
<p>Party: Town of Wilton</p> <p>Monte E. Frank, Esq. Cohen and Wolf P.C. 158 Deer Hill Avenue Danbury, Connecticut 06810 (203) 337-4134 (203) 576-8504 - fax</p>	<p>Party: Town of Weston</p> <p>David A. Ball, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, Connecticut 06604 (203) 337-4134 (203) 576-8504 - fax</p>	<p>Party: Town of Cheshire</p> <p>Richard J. Burturla, Esq. Town Attorney Berchem, Moses &amp; Devlin, PC 75 Broad Street Milford, CT 06460 (203) 782-1200 (203) 878-4912 - fax</p>
<p>Party: Town of Orange</p> <p>Mitchell R. Goldblatt First Selectman Town of Orange 617 Orange Center Road Orange, Connecticut 06477-2499 (203) 891-2122 ext. 737 (203) 891-2185 - fax</p>	<p>Intervenor: Connecticut Business &amp; Industry Associate (CBIA)</p> <p>Robert E. Earley Connecticut Business &amp; Industry Assoc. 350 Church Street Hartford, CT 06103-1106 (860) 244-1900 (860) 278-8562 - fax</p>	<p>Party: Town of Bethany</p> <p>Honorable Derrylyn Gorski First Selectwoman Bethany Town Hall 40 Peck Road Bethany, CT 06524-3378 (203) 393-2100 ext. 100</p>
<p>Party: Town of Hamden</p> <p>Joaquina Borges King Assistant Town Attorney Hamden Government Center 2750 Dixwell Avenue Hamden, CT 06518 (203) 287-7050 (203) 287-7051 - fax</p>	<p>Party: City of Middletown</p> <p>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</p>	<p>Party: Town of North Haven</p> <p>David J. Monz Updike, Kelly &amp; Spellacy, P.C. One Century Tower 265 Church Street New Haven, CT 06510 (203) 786-8303 (203) 772-2037 - fax</p>

<p>Party: Town of Easton</p> <p>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</p>	<p>Intervenor:</p> <p>Honorable William A. Aniskovich  State Senate – 12<sup>th</sup> District  15 Grove Avenue  Branford, CT 06405  (860) 240-0596</p>	<p>Intervenor:</p> <p>First District Water Department</p> <p>Franco Chieffalo  General Supervisor  First District Water Department  P.O. Box 27  Norwalk, CT 06852  (230) 847-7387  (203) 846-3482 – fax</p>
<p>Party: Woodbridge Jewish Organizations</p> <p>David R. Schaefer, Esq.  Brenner Saltzman &amp; Wallman, LLP  271 Whitney Avenue  New Haven, CT 06511  (203) 772-2600  (203) 562-2098 - fax</p>	<p>Intervenor:</p> <p>Senator Joseph J. Crisco, Jr.  17<sup>th</sup> District  State Capitol  Hartford, CT 06106-1591  (860) 240-0189  (860) 240-0027 – fax</p>	<p>Intervenor:</p> <p>Honorable Leonard A. Fasano  State Senator – 34<sup>th</sup> District  7 Sycamore Lane  North Haven, CT 06473  (203) 234-2371</p>



Scott T. Penner, Esq.