

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

The United Illuminating Company Application for a ) Docket 317  
Certificate of Environmental Compatibility and Public )  
Need for the Construction, Maintenance, and )  
Operation of a Proposed 115-kV/13.8-kV Electric )  
Substation and Associated Facilities at 3-7 )  
Wildflower Lane, Trumbull, Connecticut ) October 10, 2006

**THE UNITED ILLUMINATING COMPANY'S INTERROGATORIES TO THE  
WILDFLOWER COALITION PETITIONERS AND TOWN OF TRUMBULL**

The United Illuminating Company ("UI" or "Company") hereby submits these interrogatories to the Wildflower Coalition Petitioners (the "WCP") and the Town of Trumbull (the "Town"). Please provide responses no later than October 20, 2006.

**Wildflower Coalition Petitioners**

1. Identify all the potential sites for the substation that the WCP intend to present to the Connecticut Siting Council ("Council") as an alternative to the Wildflower Lane site. Provide any maps, drawings and figures showing the alternate sites.
2. For each site, provide information concerning ownership, including but not limited to, name, address, telephone number and nature of ownership of the site.
3. Provide copies of all communications, including but not limited to email correspondence, with any owners of the potential sites which communications discuss the use of the site for an electric substation.
4. Identify any person or entity who consulted with or provided information to the WCP on issues relating to the identification of environmental, ecological, natural, recreational, historical, archeological and scenic resource values of the proposed substation and any alternate site.

5. Please provide all documents (including without limitation all memos, maps, reports, notes, field notes, surveys, studies, drafts, correspondence) of any of the persons or entities identified in response to questions 4 above concerning the proposed or alternative sites.
  
6. Identify each person who you expect to call as an expert witness at the hearings before the Siting Council in connection with the identification of and impact on environmental, ecological, natural, recreational, historical, archeological and scenic resource values of the proposed substation and any alternate site. With respect to each such witness:
  - (a) state the subject matter on which the expert is expected to testify;
  - (b) state his or her qualifications as an expert with respect to the identified subject matter, including a list of all publications authored by the witness within the preceding ten years, and provide a copy of his or her curriculum vitae;
  - (c) provide a complete statement of all opinions to be expressed and the basis and reasons therefor;
  - (d) identify the data or other information considered by the witness in forming his or her opinions;
  - (e) identify any exhibits to be used as a summary of or as support for the opinions;
  - (f) identify all cases or administrative hearings during which the witness testified as an expert within the preceding four years.

**Town of Trumbull**

1. Identify all the potential sites for the substation that the Town intends to present to the Council as an alternative to the Wildflower Lane site. Provide any maps, drawings and figures showing the alternate sites.
  
2. For each site, provide information concerning the ownership, including but not limited to, name, address, telephone number and nature of ownership of the site. If any of the alternative sites are owned by the Town, identify the approvals would be necessary to sell the property to UI.

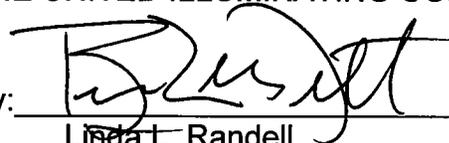
3. Provide copies of all communications, including but not limited to email correspondence, with any owners of the potential sites which communications discuss the use of the site for an electric substation.
4. Describe the nature of communications between the Town and residents within 500' feet of any of the alternative sites concerning the possible location of the substation at the alternative site.
5. Identify any person or entity who consulted with or provided information to Trumbull on issues relating to the identification of environmental, ecological, natural, recreational, historical, archeological and scenic resource values of the proposed substation and any alternate site.
6. Describe all the procedural steps (including but not limited to approval by the Town Council or vote by the Town) the Town would have to undertake to sell to UI any site owned by the Town for use as an alternate site for the substation.
7. Describe the nature of communications between the Office of the Selectman and the Town Council regarding the potential sale to UI of any site owned by the Town for use as an alternate site for the substation.
8. Describe the nature of communications between the Office of the Selectman and any Town boards or commissions (including but not limited to Inland Wetlands and Planning and Zoning) regarding the potential sale of any site owned by the Town for use as an alternate site for the substation.
9. Please provide all documents (including without limitation all memos, maps, reports, notes, field notes, surveys, studies, drafts, correspondence) of any of the persons or entities identified in response to question 5 above.
10. Identify each person who you expect to call as an expert witness at the hearings before the Siting Council in connection with the identification of and impact on environmental, ecological, natural, recreational, historical, archeological and scenic resource values of the proposed substation and any alternate site. With respect to each such witness:
  - (d) state the subject matter on which the expert is expected to testify;
  - (e) state his or her qualifications as an expert with respect to the identified subject matter, including a list of all publications authored by the witness within the preceding ten years, and provide a copy of his or her curriculum vitae;

- (f) provide a complete statement of all opinions to be expressed and the basis and reasons therefor;
- (g) identify the data or other information considered by the witness in forming his or her opinions;
- (h) identify any exhibits to be used as a summary of or as support for the opinions;
- (i) identify all cases or administrative hearings during which the witness testified as an expert within the preceding four years.

Respectfully submitted,

THE UNITED ILLUMINATING COMPANY

By: \_\_\_\_\_

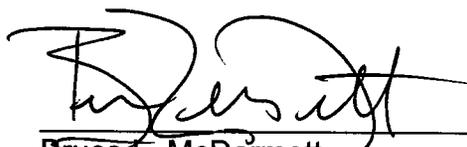


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## CERTIFICATION

This is to certify that on this 10th day of October, 2006, the original and 20 copies of the foregoing was delivered by hand to the Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051, one (1) copy was mailed, postage prepaid, to all other known parties and intervenors, and an electronic copy was provided to the Siting Council and all other known parties and intervenors.

By:



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Bruce L. McDermott