

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

Re:

**The United Illuminating Company Application
For a Certificate of Environmental Compatibility
and Public Need for the Construction, Maintenance
and Operation of a Proposed 115 kV/13 kV Electric
Substation and Associated Facilities Located
at 3-7 Wildflower Lane, Trumbull, Connecticut**

Docket No. 317

October 5, 2006

**INTERROGATORY REQUEST TO APPLICANT FROM
WILDFLOWER COALITION**

The Wildflower Coalition submits the following interrogatories to The United Illuminating Company in connection with the above captioned Docket and requests a response on or before October 19, 2006. Any volume references shall refer to Volume 1 or Volume 2 of the Application dated June 30, 2006 ("Application").

1. In § 6.1.1 (Volume 2, p.16) the Application states there are residential properties within one hundred yards of the Site 1 (hereinafter "Wildflower Lane" or "Site 1").
 - a. Identify how many residential properties are within one hundred yards of the Site, and the specific distances of those properties from the Site.
 - b. Identify the distance of Site 1 to the closest residential structure/ appurtenance on Stella Street.
 - c. Identify how many residences are located within 1000 feet of Site 1.

2. In §6.3.3 (Volume 2, p. 25) one of the environmental considerations of the Site 6C (Town parcel) site location is characterized as increasing "traffic on the residential streets in the area." Please identify how traffic from a location at site 6C will be increased any differently/more significantly than a location at the Wildflower Lane Site (for which traffic is not mentioned as an issue).

3. Please provide all of the documentation upon which you reviewed and/or relied in making a determination or identification of wetlands or watercourses for all of the possible site locations.

4. Please provide the viewshed map prepared to for Site 1 to support the statements regarding visibility (i.e. minimal visual and aesthetic impact, seasonal and year round visibility, impact to residents and motorists, etc.)
5. Please identify the assumptions and methodology used in preparing the photorenderings contained in Exhibit A.
6. Has UI ever prepared photorenderings of the proposed substation and/or stealthing options contained in Exhibit A for Site 4B or any of the Site 6 options?
7. Given the Town and residents' clearly stated interest in the Quarry Road site (Site 11), why did UI not pursue this to completion and determine what price the landowner wanted to sell the property?
8. It is noted several times in the Application that Trumbull has indicated a willingness to discuss selling a portion of the Town property for this substation.
 - a. Has UI ever sat down with Town representatives to identify a location within the 20+ acre Rocky Ridge (Site 6) parcel that could accommodate the needs of UI and address the concerns of the Town and its residents?
 - b. Has UI ever specifically discussed the sale of Site 6 (or a portion thereof) with the Town?
 - c. Has UI ever discussed a land swap with the Town regarding Site 6 or any of the other Town parcels in consideration?
 - d. Has UI ever investigated any of the Town property that is to the rear of Unity Park (proximate to Quarry Road)? If so, what areas of the property were considered?
9. Were noise monitoring studies conducted at the end of Stella Street, the closest and most dense residential neighborhood to the proposed substation?
 - a. If not, how did Black and Veatch predict sound level increases at 45 Stella Street without having taken any baseline data from that location?
 - b. How does UI intend to ensure that any post construction noise levels are within the ranges predicted in the Black and Veatch study?

10. Please provide the magnetic field calculation results for existing and proposed configuration for normal and peak loading conditions (in the same format as Table 4 of the revised EMF Assessment) for the following locations:
- a. Rear property line of 45 Stella Street at the point closest the proposed substation location;
 - b. Rear property line of 39 Stella Street at the point closest to the proposed substation location; and
 - c. Rear property line of 52 Stella Street at the point closest to the proposed substation location.
11. Did UI consider upgrading other areas of its system prior to proposing this substation? If so, what types of upgrades did it consider?

Respectfully submitted,

By  _____
Julie D. Kohler, Esq.
Carrie L. Larson, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604
(203)368-0211
Its Attorneys

Certification

This is to certify that a copy of the foregoing has been mailed, this date to all parties and intervenors of record.

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Carrie L. Larson