

March 9, 2004

Ms. Pamela B. Katz
Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 272 - Middletown-Norwalk 345kV Transmission Line

Dear Ms. Katz:

This letter provides the response to requests for the information listed below.

With this filing, the Company has completed responding to all of the interrogatories requested during this proceeding.

Response to PSEG-01 Interrogatories dated 02/11/2004

PSEG - 016 , 017 , 021 , 023 , 024 , 025 , 026 , 027 , 029 , 030 , 031 , 032 , 033 , 034 , 035 , 036 , 037 ,
038 , 039 , 040 , 041 , 042 , 043 , 045 , 046 , 047 , 048 , 049 , 050 , 051 , 052 , 053 , 054 , 055 , 056 , 057
, 058 , 059 , 060 , 061 , 062 , 063 , 064 , 065 , 066

Very truly yours,

Anne B. Bartosewicz
Project Director - Transmission Business

ABB/tms
cc: Service List

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-016
Page 1 of 1

Witness: Michael Raber
Request from: PSEG Power Connecticut

Question:

Explain how Raber Associates made the determination which Historic Resources were "Significant" enough to warrant mention in its report. If that determination is contained in any report or document, provide a copy thereof.

Response:

This interrogatory is overly broad and goes beyond reasonable discovery and long-standing practice in Siting Council proceedings. Under the Uniform Administrative Procedure Act, a party has the opportunity to "inspect and copy relevant and material records, papers and documents not in the possession of the party or such agency, except as otherwise provided by federal law or any other provision of the general statutes..." Conn. Gen. Stat. § 4-177c(1) (emphasis added). CL&P and UI object to this interrogatory to the extent that the interrogatory does not seek relevant and material information. Accordingly, CL&P and UI are answering this interrogatory to the extent the interrogatory seeks information that will assist the Siting Council in determining whether the statutory criteria for granting a certificate of environmental compatibility and public need have been met in this proceeding.

CL&P and UI object to the scope of the term "document," (referenced in this interrogatory, other PSEG interrogatories) and as defined in the "Definitions" section. Without waiving this objection, CL&P and UI respond as follows.

As noted on pages 4-5 of Raber Associates' September 2003 report, the universe of significant historic resources included those properties listed on, or previously determined as eligible for listing on, the state or national registers of historic places. This universe was selected based on discussions with the State Historic Preservation Office's Staff Archaeologist Dr. David A. Poirier and Historical Architect Susan R. Chandler. For the resources noted in PSEG-01, Q-PSEG-015, tables in the report reference nominations to the state or national registers, and historic resource surveys, supporting inclusion of each resource. These documents are publicly available at the State Historic Preservation Office and the Connecticut Historic Preservation Collection, Dodd Center, University of Connecticut, Storrs.

**Witness: Jay Williams
Request from: PSEG Power Connecticut**

Question:

Identify each factor considered by Power Delivery Consultants, Inc. in preparing the September 30, 2003 report in Volume 1 regarding the reliability of an underground 345-kV cable. As to each factor, describe the nature of the adverse impact each factor would have on the cable and the basis for the conclusion that the underground cable would, nonetheless, reliably operate.

Response:

Power Delivery Consultants, Inc. did not specifically address the reliability of the underground 345-kV cable in the subject report.

However, cable system reliability is an inherent and important part of the design, installation, operation, and maintenance of an underground cable system. Factors affecting reliability and their potential adverse impact are summarized below:

Cable	Potential forced outage due to inherent defect, loss of fluid pressure, overheating
Splices	Potential forced outage due to workmanship, loss of fluid pressure
Terminations	Potential forced outage due to workmanship, loss of fluid pressure
Pipe	Potential leaks due to dig-in or other causes, requiring outages to allow leak location and repair
Pressurizing plant	Potential loss of pressurization due to failure of a component

Cable failures are infrequent because of the great care taken in fabrication and installation, and the rigorous testing performed during manufacture. Splice failures do occur, but are quite uncommon.

In Docket 217, an independent cable expert who surveyed world wide experience estimated that 3 1-phase 345-kV HPFF cables in steel pipe will experience on average .5 faults per 100 miles per year.

**Witness: John J. Prete
Request from: PSEG Power Connecticut**

Question:

In conducting the Site Selection Study did UI and CL&P consider alternative substation configurations that would require a smaller parcel of land for its construction?

- a. If so, please describe those configurations.
- b. Fully explain why their use was rejected in favor of the configuration described in the Site Selection Study.
- c. Did the Applicants consider using a ring bus configuration on sites 2, 3, 4, 5, and 9? If so, provide a detailed explanation of why that configuration at those sites was rejected?
- d. Provide a copy of all studies and reports concerning the issues set forth in Interrogatory No. 21.

Response:

CL&P and UI refer PSEG to Appendix A to the Singer Substation Site Selection Study. System requirements dictate acceptable substation configuration alternatives that satisfy regional reliability criteria. The amount of equipment that must be installed within Singer Substation and the need to provide for future expansion, dictated the need to install either a Breaker-and-One-Half or Double Breaker-Double Bus configuration. The Breaker-and-One-Half configuration was chosen because it requires less space, satisfies the reliability, operability, and maintainability requirements and is less costly than a Double Breaker-Double Bus configuration.

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the discussion of Site 1 in the Site Selection Study at page 9 in Volume 6 of the Application. With respect to the statement, "The site was originally recommended by the owner as a possible site for the substation," identify who at PSEG originally recommended this site as a site for the substation? With respect to this alleged recommendation, provide the following information:

- a. the name and title of the individual who made the recommendation;
- b. when the recommendation allegedly was made;
- c. the manner in which the alleged recommendation was made (e.g., in writing, meetings, teleconferences, etc.); and
- d. if the alleged recommendation was made during a teleconference or a meeting, identify all participants to such teleconference or meeting and, if the meeting was made in writing, provide copies of all documents reflecting or referring to such recommendations.

Response:

This information was provided to UI by Robert Parnell, currently Director Asset Operations, PSEG Power Connecticut LLC, during a meeting at UI's Shelton facility on November 1, 2002. At the time of the meeting, Mr. Parnell was Director of Asset Operations, Wisvest-Connecticut, LLC. During this same meeting, which took place after PSEG announced its acquisition of Wisvest's Bridgeport Harbor Station, Mr. Parnell told UI that he was speaking on behalf of both Wisvest and PSEG.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-024
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Fully explain the measures the Applicants have taken to negotiate with PSEG for the purchase of Site 1, including, without limitation, all participants in such negotiations, the dates of such negotiations, and the place where such negotiations were held.

Response:

The Companies object to this interrogatory. PSEG was obviously present during any negotiations and therefore is already in possession of the information sought in this interrogatory.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-025
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Fully explain the basis for the statement at page 9 of the Site Selection Study that, with respect to Site 1, PSEG "has been reluctant to sell the property since its withdrawal of an 18.4 Application at the ISO for increased generation," including without limitation, all persons at PSEG with whom Applicants or their representatives communicated regarding sale of the property, the dates of such communication and the nature, in detail, of each such communication.

Response:

On or about December 9, 2002, Robert Parnell told UI that the Singer Substation had been considered a welcome addition until Wisvest made the business decision to withdraw the 18.4 applications. Mr. Parnell told UI that he would have to get back to UI about whether PSEG was still interested in selling property to UI. In early 2003, Mr. Parnell told UI that there was no benefit to PSEG in the short term if it sold the property to UI, so there was no reason for PSEG to do so.

CL&P/UI
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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-026
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Describe all communications UI and/or CL&P have had with Bridgeport Energy concerning the Singer Substation. Provide all documents concerning such communication. Provide copies of all agreements, correspondence, and memoranda of communications between UI and/or CL&P and Bridgeport Energy relative to the construction, use or maintenance of the Singer Substation and/or any future utilization of any portion of the Project by Bridgeport Energy.

Response:

ISO-NE has determined that connecting the Bridgeport Energy Generating Station to the 345-kV loop is a part of the solution to the SWCT reliability issues. Therefore, UI and CL&P object to this interrogatory because it does not assist the Siting Council in determining whether the statutory criteria for granting a certificate of environmental compatibility and public need have been met in this proceeding.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-027
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to page 11 of the Site Selection Study contained in Volume 6 of the Application and, in particular, the following statement relative to Site 6, "Plans are in place and approvals have been obtained for the construction of a 25-unit apartment complex and the property was not for sale." Fully explain how the Applicants determined that the property was not for sale. Provide copies of all correspondence or other documents reflecting any communications relative to Site 6.

Response:

During the November 2002 meeting with UI, Mr. Parnell told UI that Site 6 was not available because it would be used for low income housing. This was later confirmed with the Housing Authority and its attorney, Joseph Siciliano.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-029
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to page 12 of the Site Selection Study in Volume 6 of the Application and, in particular, the following statement relative to Site 7: Representatives from the church had communicated their intent to construct a new church building on the property and have rebuffed all further attempts to discuss this site as a possible location for the substation. Fully explain how the Applicants determined that the church intended to construct a new church on the property including, without limitation, all persons with whom Applicants had any communication, the date of such communication, the name of the Applicants' representative who had such communication, and a summary of each such communication. Provide copies of all correspondence or other documents referring to the church's intent to construct a new building on the property.

Response:

The determination that the church intends to construct a new church on the property is based on discussions between UI and Bishop White of Turner's Faith Temple Church, 350 Colorado Avenue, Bridgeport. The most recent conversation took place in October 2003.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-030
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

With respect to the discussion of Site 7, fully explain the basis for the statement, "The owner has refused to sell the property to UI," including, without limitation, all persons with whom Applicants had any communication, the date of such communication, the name of the Applicants' representative who had such communication, and a summary of each such communication. Provide copies of all correspondence or other documents referring to the owner's refusal to sell the property.

Response:

The determination that the owner of Site 7 is not willing to sell the property to UI is based on discussions between UI and Bishop White of Turner's Faith Temple Church, 350 Colorado Avenue, Bridgeport. The most recent conversation took place in October 2003.

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to page 14 of the Site Selection Study contained in Volume 6 of the Application and, in particular, the following statement made with respect to Site 8, "This site was originally recommended by the owner as a possible site for the substation." Identify who at PSEG made this alleged recommendation. In addition, state the following:

- a. when was the alleged recommendation made;
- b. where was the alleged recommendation made;
- c. how was the alleged recommendation made (e.g., in writing, in a meeting, or in a teleconference); and
- d. if the alleged recommendation was made in a meeting or a teleconference, please identify all participants to such meeting or teleconference or, if the alleged recommendation was made in correspondence, provide copies of all correspondence or other documents constituting or reflecting the alleged recommendations.

Response:

The statement that Site 8 was originally recommended by the owner appears to be incorrect, due to a misunderstanding during internal discussions at UI. UI believes that the site may have been discussed briefly with Robert Parnell during a November 1, 2002 meeting. UI understood that the site was not available because of its potential use by PSEG in connection with a new generating facility. At the time of the meeting, Mr. Parnell was Director of Asset Operations, Wisvest-Connecticut, LLC. The November 1, 2002 meeting took place after PSEG announced its acquisition of Wisvest's Bridgeport Harbor Station, Mr. Parnell advised UI that he was speaking on behalf of both Wisvest and PSEG.

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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-032
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the following sentence also appearing at page 14 of the Site Selection Study: (PSEG has) been reluctant to sell the property since the withdrawal of (its) 18.4 Application for Additional Generation.

- a. Fully explain Applicants' actual basis for making this statement.
- b. Identify who at PSEG expressed the "reluctance" referenced in this statement.
- c.. State the date and location of and all participants in any communication related to such sale or "reluctance".
- d. Provide copies of all documents constituting or reflecting an expression of PSEG's reluctance to sell the property in question.

Response:

See the response to PSEG-01, Q-PSEG-025.

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the discussion of Site 11 at page 19 of the Site Selection Study in Volume 6 of the Application.

- a. Identify who at UI and/or CL&P has been involved in meetings with Remington Rand, The Bridgeport Port Authority, The Bridgeport Economic Development Corporation, or any other entity relative to the purchase and development of Site 11 as an alternative location for the Singer Substation.
- b. Provide copies of all documents constituting or reflecting correspondence concerning the purchase or development of Site 11 as the site for the Singer Substation.
- c. Provide copies of all documents relating to the "Estimated Relocation Costs for Remington" as set forth in the charge on page 24 of the Site Selection Study.
- d. Fully explain why siting of the substation at Site 11 would require four acres of land, whereas siting at any of the other ten potential sites would require only 2-3 acres.

Response:

CL&P and UI object to the scope of the term "Document" as contained in this interrogatory and as defined in the "Definitions" section.

UI has had numerous discussions with Remington Products regarding the use of Site 11 for the Singer Substation. To the best of UI's knowledge, the first such contact took place in March 2003 when UI contacted Al Castaldi, CFO of Remington, and expressed interest in Site 11. At that time, however, Remington was not interested in selling Site 11 but stated that it might consider selling the property if UI agreed to pay to relocate the company. In May 2003 the Port Authority expressed an interest in Site 11 for a high speed ferry and UI began to explore possibility of sharing the site. In June 2003 PSEG informed UI that Site 11 was for sale and UI again contacted Remington to discuss the sales price. During that conversation, Remington again mentioned that relocation costs were a condition of the sale of Site 11 to UI.

UI then obtained information regarding the square footage of the Remington facility from Remington and then spoke with a local real estate agent to get average prices for industrial square footage in Bridgeport and commercial office space in the Trumbull/Shelton area (where Remington had expressed an interest in relocating). UI used that information to calculate a total relocation cost and in doing so assumed the relocation costs would be split in some manner with the Port Authority and that UI would pay 4/11 of the relocation costs. However, there was never an agreement with the Port Authority to split the relocation costs.

Site 11 is currently owned by Rayovac, which purchased Remington, and UI understands that Rayovac plans to relocate the company to Texas.

It is UI's understanding that the east property lines of Site 11 contain two adjacent easements "A and B" which appear to have storm sewers installed in them. Accordingly, approximately 30,000 square feet of property is not suitable for construction. That area of the property can, however, be used as maneuvering areas for tractor trailers

that are either bringing in equipment for the initial installation or when damaged equipment must be replaced.

Finally, access from Henry Street with major equipment is not possible due to the required 55 foot turning radius for the tractor trailers.

UI's proposed substation fits on the buildable portion of the newly defined parcel. The remainder of the land to the south would go to the Port Authority for development of a terminal for a high speed ferry facility.

The City of Bridgeport has made clear that it prefers that UI utilize Site 1 and does not want Site 11 to be used for the construction of a substation.

CL&P/UI
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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-034
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the discussion of Site 11 at page 20 of the Site Selection Study in Volume 6 of the Application. Fully explain the basis for the statement, "the acquisition of ROW for overhead 345-kV line is highly unlikely."

Response:

Page 20 of the Singer substation Site Selection Study in Vol 6 of the Application references the acquisition of ROW for overhead 115-kV lines - not 345-kV lines as posed in the question. The Companies will assume that this is the question being asked.

Overhead 115-kV transmission lines would have to be situated all or in part along city streets such as Main Street, Broad Street, Atlantic Street, Henry Street, and Russell Street. These streets are a combination of residential, commercial, and industrial usage. The combination of usage and the narrow city streets caused the Companies to consider this option unconstructable.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-035
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Based upon the discussions with The Bridgeport Economic Development Corporation and The Bridgeport Port Authority, how much of the estimated cost of development would be borne by UI and/or CL&P? How much would be borne by the City of Bridgeport or any other entity? How have these amounts been computed?

Response:

UI has not discussed "Development Costs" with the Bridgeport Economic Development Corporation or the Bridgeport Port Authority. Any development costs UI would incur would be associated with the construction costs of Singer Substation. Property cost would be a ratio of the land utilized by UI vs. that which the Port Authority utilizes. Any discussions with the Bridgeport Economic Development Corporation centered around relocating Remington from its 60 Main St. location to somewhere else in Bridgeport. Recently, Rayovac has announced the plant closing and its intention to move its operation to Texas.

CL&P/UI
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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-036
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Of the estimated relocation costs for the Remington operation currently sited at Site II, how much of that cost would be borne by UI and/or CL&P? How much of that cost would be borne by Remington? How much of that cost would be borne by the City of Bridgeport or any other entity?

Response:

The relocation costs for the Remington operation currently sited at Site 11 are moot because UI understands that the plant, which is now owned by Rayovac, is closing and relocating outside of the City of Bridgeport.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-037
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to Appendix A to the Site Selection Study entitled, "Black & Veatch Report Singer Substation GIF Configuration Option" dated December 13, 2002. Identify who at UI and/or CL&P provided any information in connection with the completion of the Report and a description of the information provided by each and provide a copy of all documents containing such information.

Response:

UI assumes that the question refers to "GIS" and not "GIF". Black and Veatch was commissioned by UI and NU to analyze substation configurations and to provide the positive and negative aspects of each configuration, as well as under what circumstances it would be a viable option. Numerous people at UI and NU reviewed and commented on draft versions of the report. If PSEG has specific questions concerning these configurations, a witness will be available during the Siting Council hearings to answer these questions.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-038
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Of the eleven sites contemplated in the Site Selection Study, which ones were considered in evaluating the four substation configuration options referenced in Black & Veatch Report?

Response:

None. The substation configuration option selection was based on the needs of the electric system not on land needs.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-039
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

The conclusion of the Black & Veatch report references "five proposed properties" that were considered in evaluating the feasibility of each of the four substation configurations. Identify those five properties. If the remaining six properties discussed in the Site Selection Study were not considered by Black & Veatch in preparing its report, fully explain why those six additional sites were not considered.

Response:

There are two Black & Veatch Reports. In responding to this interrogatory, UI assumes that it refers to the December 13, 2002 Singer Substation GIS Configuration Options Report ("Report #1"), Appendix A to Volume VI of the Application. Site selection is an ongoing process, and Report #1 uses a different site numbering system than UI currently uses to identify specific sites. The conclusion of Report #1 refers to "Alternate Site 1," "Alternate Site 2," "Alternate Site 3," "Alternate Site 4" and the "Proposed Site," which UI currently refers to as Sites 6, 7, 3, 4 and 5, respectively. The remaining six properties discussed in the Site Selection Study were not considered by Black & Veatch with respect to Report #1 because they were not identified by UI as possible locations for the substation at the time. Subsequent to the preparation of Appendix A, the Breaker-and-One Half configuration was chosen as the Singer substation configuration for reasons detailed in Appendix A. Consequently, there was no need to evaluate the remaining sites using the other three configurations

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Other than the four substation configuration options discussed in the Black & Veatch Report, are there any other possible substation configuration models?

- a. If so, fully describe each.
- b. If so, did Black & Veatch consider those options?
- c. Did the Applicants consider those options?
- d. If those options were considered, why were they not discussed in the Black & Veatch Report?
- e. If those options were not considered, explain why they were not considered by either Black & Veatch or the Applicants.

Response:

UI is unaware of any other substation configurations in common usage for projects of this nature.

**Witness: John J. Prete
Request from: PSEG Power Connecticut**

Question:

As to the preferred cable route into the Singer Substation and both alternative routes discussed in the Application, provide the following information:

- a. Does the discussion of the routes in the Application presuppose siting of the Singer Substation at the corner of Atlantic and Main Street?
- b. Did the Applicants consider routes that involved siting of the Singer Substation at a location other than the corner of Atlantic and Main Streets?
- c. If such consideration was undertaken, identify who performed any study of such locations and when it was performed.
- d. Provide a copy of all documents related to, used in, or referencing such consideration.

Response:

- a. No. The target location for the Singer Substation was identified as in the vicinity of Bridgeport Harbor Generating Station, Bridgeport Energy and the existing Pequonnock Substation.
- b. Yes. A total of 11 sites were evaluated; 6 were found buildable.
- c. By a conservative estimate, dozens of individuals at UI and CL&P were involved in drafting, reviewing and preparing the parts of the application concerning or referring to Singer Substation. Providing a list of these individuals will not assist the Siting Council in determining whether the statutory criteria for granting a certificate of environmental compatibility and public need have been met in this proceeding. If PSEG has specific questions concerning Singer Substation, a witness will be available during the Siting Council hearings to answer those questions.
- d. Please refer to Volume 6 of the application - Singer Substation Site Selection Study.

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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-042
Page 1 of 1

Witness: Anne Bartosewicz; John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to page D-2, footnote 1 of Volume 1 of the Application. Please produce a copy of all agreements between the Applicants related to their respective ownership of the Project facilities, including, but not limited to, any agreements that relate to the use and ownership of the Singer Substation by the Applicants and/or any other entity.

Response:

The only agreement between the Applicants relating to their respective ownership of the Project facilities is the Conceptual Stage Agreement RE: Middletown to Norwalk 345-kV Transmission Line provided in the response to PSEG-01, Q-PSEG-03.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-043
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to page E-4, Footnote 2 of Volume 1 of the Application, as to all meetings with the City of Bridgeport during the municipal consultation process, please state:

- a. When each meeting was held;
- b. Who attended;
- c. In detail, what was discussed at each such meeting;
- d. Did any minutes, notes, correspondence or other documents resulted from or relate to such meeting; and
- e. If the answer to d, is yes, please provide a copy of such documents.

Response:

See page R-2 of the Application.

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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-045
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to page J-23 of Volume 1 of the Application. Please state whether any studies were conducted of subsurface conditions at the Site 1 or at any of the other ten sites referenced in the Application including, but not limited to, to the need for and/or effect of blasting or pile driving in connection with construction of the proposed substation. If the answer is yes, state the date of such studies, who performed them, the methodology thereof, and the results thereof. Provide a copy of such studies or reports.

Response:

UI has not been given permission to conduct subsurface investigations of the properties. UI attempted to gain access to Site 1 for this purpose, among others, by sending a November 6, 2002 letter to Robert Parnell, asking him to respond so that UI could begin its preliminary engineering of the site. Mr. Parnell never responded to UI's request.

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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-046
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to pages 7 and 19 of the Site Selection Study what "expansion" has either Applicant considered in connection with the proposed substation. If any written study, report, or memorandum exists in connection with such "expansion," please provide a copy thereof.

Response:

No study, report, or memorandum exists. Substations are never constructed to meet current capacity but rather prudent design is to design a substation so that future expansion is possible.

**Witness: John J. Prete
Request from: PSEG Power Connecticut**

Question:

Reference is made to page 12 of the Site Selection Study, in which it states "the site requires a zoning change". As to the referenced Site 7 and any other site as to which a zoning change would be required, please state whether the Applicants have made any inquiry to the City of Bridgeport or any of its planning or zoning departments, boards or commissions as to the possibility of a zone change or variance, either by application or as a result of any consideration by the City of Bridgeport of its zoning generally.

- a. If such inquiries were made, please state:
- i. The date of such inquiry;
 - ii. To whom such inquiry was addressed;
 - iii. The response to such inquiry; and
 - iv. If any documents exist regarding such inquiry or the response thereto, please provide a copy thereof.

Response:

The Site Selection Study incorrectly states that a zoning change will be required if the substation is located on Site 7. Pursuant to Conn. Gen. Stat. 16-50x, the Siting Council has exclusive jurisdiction over the location of substations designed to change or regulate the voltage of electricity at sixty-nine kilovolts or more. However, a city zoning commission is afforded the opportunity to regulate and restrict the proposed location of a substation, subject to appeal to the siting council.

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Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-048
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the chart of differential costs set forth on page 23 of the Site Selection Study. Please provide any appraisals or other documents setting forth any of the "costs" set forth on such chart. To the extent that no such documents are available, set forth in detail the method of calculation of such costs, e.g. costs per mile for cable installation, etc. Identify all persons who performed or were contacted regarding such cost determination and state when such computations were made. Provide a copy of the documents used in or relating to such calculations.

Response:

Any appraisals concerning possible sites for the Singer Substation are confidential and not subject to disclosure to PSEG. The method of calculation of the differential costs is contained in Appendix D of the Singer Substation Site Selection Study.

CL&P/UI
Docket No. 272

Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-049
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the chart of Estimated Relocation Costs for Remington, set forth at page 24 of the Site Selection Study. Please fully explain any authority upon which Applicant relies for the assumption that, if the land and/or building at Site 11 is taken by eminent domain, Applicants will be required not only pay for the land and building, but also to pay an additional expense for the relocation cost for the replacement by Remington of manufacturing and office space.

Response:

Questions concerning the relocation costs for the Remington operation currently sited at Site 11 are moot because UI understands that the plant, now owned by Rayovac, is closing and relocating outside of the City of Bridgeport.

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Dated: 02/11/2004
Q- PSEG-050
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the property identified as "Site 11" in the Site Selection Study. Please state whether any estimates have been obtained for amounts which could be obtained if the portion of that site not used for the substation were sold.

Response:

The Singer Substation Site Selection Study assumes UI will need 4 acres of Site 11 for construction of the Substation and the cost estimates for construction of the Substation on this property reflect use of only 4 acres of the Site. The City of Bridgeport has made clear that it does not want UI to use Site 11 for the construction of a substation.

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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-051
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the property identified as "Site 11" in the Site Selection Study. Please state whether any study was made of or consideration was given to taking by eminent domain only such portion of that 11-acre property as would be necessary to accommodate the substation facility, leaving the balance with the current owner. If so, please summarize the results of such consideration, state when it was made, who was involved in its consideration, and the estimated cost of such a limited taking and provide a copy of any documents related thereto.

Response:

The Singer Substation Site Selection Study assumes UI will need 4 acres of Site 11 for construction of the Substation and the cost estimates for construction of the Substation on this property reflect use of only 4 acres of the Site. The City of Bridgeport has made clear that it does not want UI to use Site 11 for the construction of a substation.

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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-052
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to "United Illumination: Singer Substation Site Selection Study: Revision 1: Date: June 24, 2003" ("Revision 1"), please provide a copy of such study prior to such "Revision 1" thereof.

Response:

The copy of the study prior to Revision 1 is identical to the document contained in Appendix E of the Singer Substation Site Selection Study but does not contain a discussion of Site 11. In other words, Revision 1 added Site 11 to the study. The City of Bridgeport has made clear that it does not want UI to use Site 11 for the construction of a substation.

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Q- PSEG-053
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the "Conclusion" of Revision 1, where it states that the "study assumes that sufficient aerial R.O. W. can be obtained to route 115-kV transmission line circuits to Sites #1 and #8 overhead." Please state whether the Applicants have concluded that such R.O.W. can be obtained, describe how it is to be obtained, and provide all documents related to such determination.

Response:

UI has not concluded that sufficient aerial right-of-way can be obtained. While no formal study was undertaken, a review of the area since the assumption was made by Black and Veatch that it may be possible to obtain sufficient aerial right-of-way to route 115-kv transmission lines to Sites #1 and 8 has indicated that it is not feasible to do so. The current design of the Singer Substation does not call for any new aerial right-of-way into or out of the substation site.

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Dated: 02/11/2004
Q- PSEG-054
Page 1 of 1

Witness: Richard J. Reed
Request from: PSEG Power Connecticut

Question:

Please provide a copy of all special acts, charter provisions or other authority which Applicants contend will provide them the right of eminent domain to take the property upon which the substation is to be constructed. Provide a copy of any such charter provisions or authority and a copy of the document filed by United Illuminating with the Secretary of the State of Connecticut on April 2, 1952.

Response:

Any documents filed by UI with the Secretary of the State of Connecticut are available to the public and can be obtained by PSEG. For ease of reference, and without waiving any other rights it may have, UI encloses a copy of 1951 Conn. Special Acts 482 §1 (Vol. XXVI, p. 348), which permits UI, in addition to other rights, to "take and use all such land, interests in land and real estate as shall be necessary or convenient." UI also encloses a copy of the Certificate of Acceptance of Amendment to Charter" that was filed with the Secretary of State on April 2, 1952. See also Conn. Gen. Stat. § 16-50x(c); and UI and CL&P's December 22, 2003 Memorandum Concerning Eminent Domain Powers and Franchise Rights to Install Facilities in Highways.

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Q- PSEG-055
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Reference is made to the references to "blasting" in pages J-8 through J-9, J-21 through J-25, and K-8 of Volume 1 of the Application. Please state the following:

- a. Was any study conducted concerning the potential adverse effects of blasting on each of the eleven potential sites for the Singer Substation?
- b. If so, who conducted each such study, when was it conducted, and on what sites was it conducted?
- c. State in detail the results of each such study.
- d. Provide a copy of all documents, including reports, that discuss such studies and their results.

Response:

- a. No.
- b-d. Not applicable

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Dated: 02/11/2004
Q- PSEG-056
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Was any study conducted concerning the adverse effects of pile driving in each of the eleven potential sites for the Singer Substation?

- a. If so, who conducted each such study, when was it conducted, and on what sites was it conducted?
- b. State in detail the results of each such study.
- c. Provide a copy of all documents, including reports, that discuss such studies and their results.

Response:

- a No.
- b-c Not applicable

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Dated: 02/11/2004
Q- PSEG-057
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Are any of the proposed alternative locations for the Singer Substation located in the coastal zone?

Response:

Yes. All but a portion of site 10 are in the coastal zone.

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Dated: 02/11/2004
Q- PSEG-058
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

What measures will be implemented by the Applicant in the construction and operation of the Singer Substation to protect the State's coastal resources?

Response:

UI will construct and operate the Singer Substation as authorized by the Connecticut Siting Council, the Connecticut Department of Environmental Protection and the U.S. Army Corps of Engineers. UI anticipates that as a condition of the Siting Council's approval of the substation, the Council will require its approval of development and management plans that may include plans for the protection of the State's coastal resources.

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Have the Applicants conducted an asbestos survey of the warehouse located at Site 1?

- a. If so, what were the results of such survey?
- b. Please provide a copy of documents and reports that discussed such survey and its results.
- c. Have costs of asbestos removal been factored into the Project's costs?

Response:

No. Site 1 is not currently owned by UI and UI has not received permission to conduct an asbestos survey of the property. UI attempted to gain access to Site 1 for this purpose, among others. On November 6, 2002 UI sent a letter to Robert Parnell, asking him to respond so that UI could begin its preliminary engineering of the site. Mr. Parnell never responded to UI's request.

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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-060
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Have the Applicants conducted soil and/or groundwater testing or investigation at each of the eleven sites discussed in the Site Selection Study?

- a. If so, what are the results of such testing or investigation?
- b. Please provide a copy of all documents and reports that discuss such testing or investigation.
- c. Have the costs of soil and/or groundwater remediation been factored into the Project costs?

Response:

The sites are not currently owned by UI and UI has not been given permission to conduct subsurface investigations of the properties. UI attempted to gain access to Site 1 for this purpose, among others. On November 6, 2002 UI sent a letter to Robert Parnell, asking him to respond so that UI could begin its preliminary engineering of the site. Mr. Parnell never responded to UI's request

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Dated: 02/11/2004
Q- PSEG-061
Page 1 of 1

Witness: Richard J. Reed; Roger C. Zaklukiewicz
Request from: PSEG Power Connecticut

Question:

Please state whether either Applicant has considered any future plans to construct underwater power transmission lines from the Project to Long Island or to transmit power transported by the Project to Long Island by any means. If the answer is yes, please describe such plans and, if they are referenced in any document, provide a copy thereof.

Response:

CL&P and UI do not have any plans to construct new underwater power transmission lines that would transmit power between Connecticut and Long Island. CL&P plans the replacement of the submarine cable system between Norwalk Harbor substation in Connecticut and Northport, New York. The submarine cable system has been moving power between CT and NY for more than 30 years. In September of 2002, the Siting Council approved the replacement of the existing 138-kV fluid-filled cables with new solid conductors. It is unclear when the replacement will be carried out due to issues with the Long Island Power Authority, the co-owner of the system.

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

As to each of the eleven sites discussed in the Site Selection Study, list the last date on which the Applicants inquired as to the owner's willingness to sell the property, state who made such inquiry, to whom such inquiry was made, and the result thereof. If any documents exist relating to or arising from such inquiry, provide a copy thereof.

Response:

Site 1: Robert Parnell suggested this site to UI in a November 1, 2002 meeting as a possible location for Singer Substation. The most recent inquiry about the site took place in a meeting on January 12, 2004, but Mr. Parnell refused to discuss it.

Site 2: Robert Parnell suggested this site to UI in a November 1, 2002 meeting as a possible location for Singer Substation. During the meeting, UI told Mr. Parnell that it did not think that the site was large enough to accommodate the substation. Soon after the meeting, UI confirmed that the site was too small and therefore did not pursue its acquisition.

Site 3: Early in the site review process, UI determined that this site was too small and therefore did not pursue its acquisition.

Site 4: UI owns this site. However, it is too small to accommodate Singer Substation.

Site 5: In mid-February 2003, the space requirements for the Singer Substation expanded due to an increase in the underground portion of the project. Site 5 was therefore no longer viable. In addition, Mr. Parnell had told UI at the November 1, 2002 meeting that site 5 was needed by PSEG as part of a potential installation of pollution control and therefore the site was not available.

Site 6: On or about November 20, 2002, UI confirmed with the Housing Authority and with the Housing Authority's attorney, Joseph Siciliano, that Site 6 was not available due to the construction of low income housing.

Site 7: On or about October 16, 2003, Bishop White confirmed that he was building a church on Site 7 and was not interested in selling. In addition, this site is west of Main Street. The City of Bridgeport objects to UI's building Singer Substation west of Main Street because of planned residential development.

Site 8: On or about October 16, 2003, Robert Parnell said that PSEG had not changed its position and that Site 8 was not for sale.

Site 9: Early in the site review process, UI determined that this site was too small and housed an historic property. Therefore, UI did not pursue its acquisition. In early December 2003, a broker contacted UI about a possible sale of the property, but UI confirmed that the property was unsuitable and did not pursue its acquisition.

Site 10: In mid-December 2003, Fred Frazinelli, a broker for a portion of Site 10, stated that he expected to have a proposal from the owner, Garfield Spencer, shortly. Around the same time, UI informed Julius Blackwelder, owner of another portion of Site 10, that UI was no longer interested in the property. Frazinelli once again contacted UI, but the City of Bridgeport has made clear that it does not want Singer Substation located west of Main Street because of planned residential development and that it objects to this site.

Site 11: On or about December 16, 2003, Kris Kelley, VP and Controller for Remington Products, indicated that Remington was interested in entering an option agreement with UI, but only if UI would take an option to the entire property, would take the property "as is," would set a purchase price upfront and have a one year option term. The City of Bridgeport has made clear that it does not want Singer Substation to be built on this site.

CL&P and UI object to the scope of the term "Document", as contained in this interrogatory and as defined in the "Definitions" section. Please also see the full objection regarding relevance in the first paragraph to the response of D-W-01, Q-D-W-001.

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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-063
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Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Once the Singer Substation is constructed, who will pay for the construction and maintenance of the interconnection between Bridgeport Energy and the substation? Provide a copy of all interconnection agreements relative to the Singer Substation.

Response:

Since the change in the interconnection point is the result of the Middletown to Norwalk Project and not the actions of Bridgeport Energy, it does not appear that Bridgeport Energy will be responsible for these costs. This responsibility will be determined in accordance with ISO-NE rules. Since Singer Substation does not exist, there is no interconnection agreement relative to the Singer Substation.

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Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-064
Page 1 of 1

Witness: John J. Prete
Request from: PSEG Power Connecticut

Question:

Did the Applicants consider siting the substation at any location other than those discussed in the Site Selection Study? If so, which locations?

Response:

No.

**Witness: Peter T. Brandien
Request from: PSEG Power Connecticut**

Question:

Did the Applicants consider reconfiguring the existing Pequonnock Substation to accommodate the 345-kV cable? If so, please state the following:

- a. Why was this alternative rejected?
- b. Who at UI and/or CL&P was involved in evaluating that alternative?
- c. Please provide copies of all documents that concern that alternative or its consideration.

Response:

- a. The minimum footprint necessary for the 345-kV gas-insulated substation is approximately 2.3 acres. The available land at the Pequonnock Substation is less than one-half of an acre. The Pequonnock site was deemed to have insufficient property to accommodate the 345-kV cables and required substation equipment.
- b. The Companies' staffs were involved in the determination of the facilities for the Middletown - Norwalk Project including the need to expand the Pequonnock Substation. Providing a list of the individuals involved will not assist the Siting Council in determining whether the statutory criteria for granting a certificate of environmental compatibility and public need have been met in this proceeding.
- c. Please refer to the Singer Substation Site Selection Study in Volume 6 of the Application.

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**Data Request PSEG-01
Dated: 02/11/2004
Q- PSEG-066
Page 1 of 1**

**Witness: John J. Prete
Request from: PSEG Power Connecticut**

Question:

Did the Applicants consider constructing the substation on the parcel of land bounded by Atlantic Street, PSEG's Bridgeport facility and Site 8 across from the main gate to the Bridgeport Energy facility? If so, state the following:

- a. When was it considered?
- b. Who was involved in such consideration?
- c. Why was this alternative rejected?
- d. Who at UI and/or CL&P was involved in evaluating that alternative?
- e. Please provide copies of all documents that concern that alternative or relate to or arise from its consideration and the conclusions thereof.

Response:

No. Bridgeport Energy's natural gas facilities exist on the property, The land that the gas facilities utilize leaves insufficient room for Singer Substation.