

April 15, 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.

Response to TOWNS-01 Interrogatories dated 01/28/2004
TOWNS - 024 SP-03***, 026 SP-01, 032 SP-01**

Response to TOWNS-05 Interrogatories dated 03/23/2004
TOWNS - 054 , 055 , 056 , 057 , 058 , 059 * , 060 *

Response to TOWNS-06 Interrogatories dated 04/02/2004
TOWNS - 067

Very truly yours,

Anne B. Bartosewicz
Project Director - Transmission Business

ABB/tms
cc: Service List

* Due to the bulk nature of this material, the Companies request bulk filing status.

** Due to the bulk nature of this material, the Companies request bulk filing status. A copy is being provided to the Siting Council and to the Towns.

*** Due to the bulk nature of this material, the Companies request bulk filing status. A courtesy copy of this bulk material is being provided to all parties represented by an attorney.

CL&P/UI
Docket No. 272

Data Request TOWNS-01
Dated: 01/28/2004
Q- TOWNS-024-SP03
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: Connecticut Siting Council

Question:

Reference page 4 of the December 16, 2003 Supplemental Filing:

- a. Provide copies of the studies, analyses, evaluations, and reports prepared by or for each of the cable consulting experts retained by CL&P and/or UI "to assess the viability of various undergrounding options for the 345-kV facilities."
- b. Provide copies of the correspondence between CL&P and/or UI and each of these experts related to the assessment of "the viability of various undergrounding options for the 345-kV facilities."

Response:

b) Pursuant to the agreement between the Towns and the Companies, copies of the correspondence between CL&P and General Electric (GE) regarding assumptions, data provided, and options discussed / considered / rejected in regard to the viability of various undergrounding options are attached.

* Due to the bulk nature of this material, the Companies request bulk filing status. A courtesy copy of this bulk material is being provided to all parties represented by an attorney.

CL&P/UI
Docket No. 272

Data Request TOWNS-01
Dated: 01/28/2004
Q- TOWNS-026-SP01
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: Connecticut Siting Council

Question:

Reference page 5 of the December 16, 2003 Supplemental Filing. Please provide copies of the correspondence between CL&P and/or UI and GE related to studies that GE was being asked to undertake.

Response:

Pursuant to the agreement between the Towns and the Companies, copies of the correspondence between CL&P and General Electric (GE) regarding assumptions, data provided, and options discussed / considered / rejected in regard to the viability of various undergrounding options are provided in the response to TOWNS-01, Q-TOWNS-024.

Witness: Cyril J. Welter
Request from: Connecticut Siting Council

Question:

Regarding the August 2003 "Middletown to Norwalk 345-kV Transmission Line Project Highway Corridor Study."

- a. Provide copies of the correspondence between CL&P/UI and Burns & McDonnell related to this study.
- b. Provide the workpapers for this study.
- c. Provide copies of any analyses, assessments, or evaluations prepared as part of this study.
- d. The statement is made in several places in this study that transition stations would require 2-4 acre sites. Please state whether this assumes the use of solid dielectric or HPFF cable.
- e. Provide the source documents and workpapers for the evaluation of the Interstate 91 Route from Black Pond Junction to Beseck Substation corridor.
- f. Provide the source documents and workpapers for the evaluation of the Interstate 91 Beseck Substation to New Haven corridor.
- g. Provide the source documents and the workpapers for the evaluation of the possible underground route in New Haven.
- h. Provide copies of the source documents and workpapers for the evaluation of the Interstate 95 corridor.
- i. Provide copies of the source documents and workpapers for the evaluation of the Wilbur Cross/Merritt Parkway corridor.

Response:

Pursuant to the agreement between the Towns and the Companies, the work papers and reproducible source documents used to prepare the Highway Corridor Study are submitted herewith.

* Due to the bulk nature of this material, the Companies request bulk filing status. A copy is being provided to the Siting Council and to the Towns.

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Data Request TOWNS-05
Dated: 03/23/2004
Q- TOWNS-054
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: TOWNS

Question:

Provide a complete list of the members of the ISO-NE Southwest Connecticut Working Group who participated in the preparation and/or review of the study entitled "Comparison of Middletown to Norwalk Project vs. East Shore Alternative."

Response:

Frank Mezzanotte - ISO-NE (Chairman)

Brent Oberlin - NU

Allen Scarfone - NU

Richard David - UI

Alex Boutsoulis - UI

Rich Pinto - UI

George Bartok - EPRO

Dave Rogers - Consultant (retired)

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Data Request TOWNS-05
Dated: 03/23/2004
Q- TOWNS-055
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: TOWNS

Question:

Provide the notes, minutes, and reports of the meetings of the ISO-NE Southwest Connecticut Working Group at which the comparison of the Middletown to Norwalk Project and the East Shore Alternative was discussed.

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. All reports comparing the Middletown to Norwalk Project and the East Shore Alternative have been provided in the supplemental filings. The ISO-NE Southwest Connecticut Working Group does not issue formal notes, or minutes of its meetings.

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Data Request TOWNS-05
Dated: 03/23/2004
Q- TOWNS-056
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: TOWNS

Question:

Provide copies of the correspondence between CL&P, or its personnel or consultants, and the members of the ISO-NE Southwest Connecticut Working Group which discussed or addressed the comparison of the Middletown to Norwalk Project and the East Shore Alternative.

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 because it does not seek relevant and material information.

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Data Request TOWNS-05
Dated: 03/23/2004
Q- TOWNS-057
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: TOWNS

Question:

Provide copies of the correspondence between UI, or its personnel or consultants, and the members of the ISO-NE Southwest Connecticut Working Group which discussed or addressed the comparison of the Middletown to Norwalk Project and the East Shore Alternative.

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 because it does not seek relevant and material information.

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Data Request TOWNS-05
Dated: 03/23/2004
Q- TOWNS-058
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: TOWNS

Question:

Provide copies of all drafts of the study entitled "Comparison of the Middletown to Norwalk Project vs. East Shore Alternative."

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 because it does not seek relevant and material information.

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Data Request TOWNS-05
Dated: 03/23/2004
Q- TOWNS-059
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: TOWNS

Question:

Provide on CD in PTI-compatible machine format, the input and results for each of the analyses discussed in the study entitled "Comparison of the Middletown to Norwalk Project vs. East Shore Alternative" or in the appendices to that study.

Response:

The attached CD contains the base cases and supporting files used to examine the Middletown to Norwalk Project. These are contained in the folder titled "MN". The cases for the East Shore Alternative have been provided in response to data request TOWNS-05, Q-TOWNS-60 and TOWNS-03, Q-TOWNS-048. The supporting files to run the analysis are included in the attached CD in the folder titled "ES". The supporting files for the East Shore Alternative are configured to be used with PTI's MUST program. The results of the testing were included in the study referenced above.

* Due to the bulk nature of this material, the Companies request bulk filing status.

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Data Request TOWNS-05
Dated: 03/23/2004
Q- TOWNS-060
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: TOWNS

Question:

Provide on CD in PTI-compatible machine format, the input and results for each of the analyses discussed in each of the two PowerGEM reports provided as attachments to Addendum No. 3 to the Supplemental Filing by UI and CL&P.

Response:

The attached CD contains the base cases used in the PowerGem Study in PTI format. The results of each analysis are contained in the appendices to the reports.

* Due to the bulk nature of this material, the Companies request bulk filing status.

CL&P/UI
Docket No. 272

Data Request TOWNS-06
Dated: 04/02/2004
Q- TOWNS-067
Page 1 of 1

Witness: Roger C. Zaklukiewicz
Request from: TOWNS

Question:

Reference the ISO-NE Southwest Connecticut Study Group report that was provided in Addendum #3 to the Supplemental Filing.

- a. Please state whether the modeling of the East Shore Alternative performed for the ISO-NE Study Group also reflected the system changes described at page 5 of the December 31, 2003 PowerGEM Report attached to Addendum #1 to the Supplemental Filing.
- b. In particular, please explain whether the rating of the East Shore to Scovill Rock 345 kV line was increased in this modeling to reflect the reconfiguring of the East Shore substation and the removal of the 345/115 kV autotransformers from the 387 line path. If the answer is no, please explain why not.

Response:

- a) The East Shore Alternative which was compared to the Middletown to Norwalk Project by the ISO-NE Study Group contained the changes listed on page 5 of the December 31, 2003 PowerGEM Report attached to Addendum #1 to the Supplemental Filing.
- b) The rating of the East Shore to Scovill Rock 345-kV line (387 line) was increased in the modeling to reflect the reconfiguring of the East Shore Substation.