

June 29, 2009

INTERROGATORIES AND DATA REQUESTS ADDRESSED TO THE CONNECTICUT LIGHT AND POWER COMPANY BY THE TOWN OF SUFFIELD

Please provide answers to the following interrogatories and data requests by July 14, 2009.

- 1. How are the costs to construct the proposed facilities calculated for the portion that passes through the Town of Suffield?
- 2. What is the unit of measure used to determine the cost of these facilities?
- 3. What would be the cost for the development of the proposed power line if the entire portion within the Town of Suffield were above ground?
- 4. What would be the cost for the development of the proposed power line if the entire portion within the Town of Suffield were below ground?
- 5. What is the cost of installation of below-ground facilities per unit of measure? What is the cost of installation of above-ground facilities per unit of measure?
- 6. How are units of electromagnetic force calculated?
- 7. Concerning the proposed facility, are there any studies of other facilities that would provide accurate data for the strength of the emf radiation per foot distance from the power lines for the above-ground portion of the installation?
- 8. Concerning the proposed facility, are there any studies of other facilities that would provide accurate data for the strength of the emf radiation per foot distance from the underground lines?
- 9. If the answer to either question 7 or 8 is yes, what is the projected emf
 - a. per foot from the underground lines or
 - b. per foot from the above-ground lines?
- 10. If there are no studies dealing with the above questions how would CL&P calculate the emf per distance for lines which are:
 - a. above ground?

- b. below ground?
- 11. What is the amortization period which CL&P uses to calculate the recovery of costs for this project from rate-payers?
- 12. How does CL&P recoup its cost of constructing this proposed facility?
- 13. Please provide the project cost to rate-payers per kilowatt-hour if the entire portion of the project located in Suffield is built below-ground.
- 14. Please provide the project cost to rate-payers per kilowatt-hour if the entire portion of the project located in Suffield is built below-ground.
- 15. Under each of the above scenarios, when would the additional cost of the project to rate-payers commence?
- 16. Under each of the above scenarios, when would the additional cost of the project to rate-payers end?

Town of Suffield

Edward G. McAnaney

Its Attorney

CERTIFICATION

This is to certify that a copy of the foregoing has been served on this 29th day of June, 2009 upon all parties and intervenors as listed on the attached Service List, via the document service manner set forth therein.

Edward G. McAnaney

Date: June 23, 2009

LIST OF PARTIES AND INTERVENORS SERVICE LIST

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	☑ U.S. Mail	The Connecticut Light & Power Co. P.O. Box 270 Hartford, CT 06141-0270	Robert E. Carberry, Manager NEEWS Projects Siting and Permitting Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-6774 carbere@nu.com
	⊠ E-mail		Duncan MacKay, Esq. Legal Department Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3495 mackadr@nu.com
	☑ U.S. Mail	· •	Jeffrey Towle, Project Manager Transmission, NEEWS Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3962 towlejm@nu.com
	⊠ U.S. Mail		Anthony M. Fitzgerald, Esq. Brian T. Henebry, Esq. Carmody & Torrance LLP P.O. Box 1950 New Haven, CT 06509 (203) 777-5501 afitzgerald@carmodylaw.com bhenebry@carmodylaw.com
Intervenor (granted on February 19,	⊠ U.S. Mail	NRG Energy, Inc.	NRG Energy, Inc. c/o Julie L. Friedberg, Senior Counsel – NE 211 Carnegie Center Princeton, NJ 08540
2009) Competing Applicant as of 03/19/2009	⊠ U.S. Mail	,	Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-5723 — fax alord@murthalaw.com

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LIST OF PARTIES AND INTERVENORS $\underline{SERVICE\ LIST}$

	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
	☑ U.S. Mail☑ E-Mail	NRG Energy, Inc. continued	Jonathan Milley Vice President, NE Region NRG Energy, Inc. 211 Princeton, NJ 08540 (609) 524-4680 (609) 524-5160 fax Jonathan.milley@nrgenergy.com
			Diana M. Kleefeld, Esq. Murtha Cullina LL CityPlace I, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6035 (860) 240-5974 dkleefeld@murthalaw.com
Party (granted November 20, 2008)	⊠ E-mail	Richard Blumenthal Attorney General	Michael C. Wertheimer Assistant Attorney General Attorney General's Office 10 Franklin Square New Britain, CT 06051 (860) 827-2620 (860) 827-2893 Michael.wertheimer@po.state.ct.us
Party (granted November 20, 2008)	⊠ E-mail	Town of East Granby	Donald R. Holtman, Esq. Katz & Seligman, LLC 130 Washington Street Hartford, CT 06106 (860) 547-1857 (860) 241-9127 dholtman@katzandseligman.com
	☑ U.S. Mail		The Honorable James Hayden First Selectman Town of East Granby P.O. Box 1858 East Granby, CT 06026

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	Document.	Status Holder .	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Party (granted November 20, 2008)	☑ U.S. Mail	Town of Suffield	Edward G. McAnaney, Esq. McAnaney & McAnaney Suffield Village 68 Bridge Street Suffield, CT 06078 (860) 668-2000 (860) 668-2666 – fax Mcananey-mcananey@att.net The Honorable Scott R. Lingenfelter First Selectman Suffield Town Hall 83 Mountain Road Suffield, CT 06078
Intervenor (granted December 4, 2008)	⊠ E-mail ⊠ U.S. Mail	ISO New England Inc.	Anthony M. Macleod Whitman Breed Abbott & Morgan LLC 500 West Putnam Avenue, P.O. Box 2250 Greenwich, CT 06830-2250 (203) 862-2458 amacleod@wbamct.com Kevin Flynn, Esq. Regulatory Counsel ISO New England One Sullivan Road Holyoke, MA 01040 (413) 535-4177 kflynn@iso-ne.com
Party (granted on January 8, 2009)	U.S. Mail	Office of Consumer Counsel	Mary J. Healey Consumer Counsel Ten Franklin Square New Britain, CT 06051 Mary.healey@ct.gov Bruce C. Johnson Principal Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Bruce.johnson@ct.gov

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LIST OF PARTIES AND INTERVENORS <u>SERVICE LIST</u>

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	⊠ E-mail	Office of Consumer Counsel Continued	Victoria Hackett Staff Attorney Office of Consumer Counsel 10 Franklin Square New Britain, CT 06051 860-827-2922 860-827-2929 - fax victoria.hackett@ct.gov
			Paul Chernick, President Resource Insight, Inc. 5 Water Street Arlington, MA 02476 (781) 646-1505 ext. 207 (781) 646-1506 - fax pchernick@resourceinsight.com
Intervenor (granted on January 22, 2009)	⊠ E-mail	Ice Energy, Inc.	Stephen J. Humes, Esq. McCarter & English LLP 185 Asylum Street, CityPlace I Hartford, CT 06103 (860) 275-6761 (860) 560-5955 - fax Shumes@mccarter.com
Party (granted on February 19, 2009)	⊠ E-Mail	Town of Enfield	Kevin M. Deneen, Town Attorney Office of the Town Attorney 820 Enfield Street Enfield, CT 06082-2997 (860) 253-6405 (860) 253-6362 – fax townattorney@enfield.org

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Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Status Granted	Sci vice	(name, address & phone namber)	(name, address & phone number)
Party (granted on April 7, 2009)	⊠ U.S. Mail	City of Meriden	Deborah L. Moore, City Attorney Meriden City Hall Department of Law 142 East Main St. Meriden, CT 06450 (203) 630-4045 (203) 630-7907 – fax dmoore@ci.meriden.ct.us
	⊠ U.S. Mail		Lawrence J. Kendzior, City Manager Meriden City Hall 142 East Main St. Meriden, CT 06450 lkendzior@ci.meriden.ct.us
Party (granted on April 7, 2009)	⊠ E-Mail	The United Illuminating Company (UI)	John J. Prete The United Illuminating Company 157 Church Street, P.O. Box 1564 New Haven, CT 06506-1904 (203) 499-3701 (203) 499-3728 neews-ui@uinet.com
	⊠ E-Mail		Linda L. Randell Senior Vice President, General Counsel and Corporate Secretary UIL Holdings Corporation 157 Church St., P.O. Box 1564 New Haven, CT 06506-0901 (203) 499-2575 (203) 499-3664 Linda.randell@uinet.com
	⊠ E-Mail	•	Bruce L. McDermott Wiggin and Dana LLP One Century Tower New Haven, CT 06508-1832 (203) 498-4340 (203) 782-2889 bmcdermott@wiggin.com

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SERVICE LIST Daniel State Hell			
Status Granted	Document Service	Status Holder	Representative
Status Granteu	Service	(name, address & phone number)	(name, address & phone number)
Intervenor (granted on June 4, 2009)	⊠ E-Mail	The Connecticut Energy Advisory Board (CEAB)	Michele S. Riverso Assistant Attorney General 10 Franklin Square New Britain, CT 06051 (860) 827-2683 Michele.riverso@po.state.ct.us
	U.S. Mail		CEAB c/o Gretchen Deans CERC 805 Brook Street, Bldg. 4 Rocky Hill, CT 06067 (860) 571-7147 gdeans@cerc.com
Party (granted on June 4, 2009)	⊠ E-Mail	Connecticut Department of Transportation	Eileen Meskill Assistant Attorney General Office of the Attorney General 55 Elm Street P.O. Box 120 Hartford, CT 06141-0120 Eileen.meskill@po.state.ct.us
	⊠ U.S. Mail	•	Thomas A. Harley, P.E. Chief Engineer Connecticut Dept. of Transportation 2800 Berlin Turnpike Newington, CT 06131
Intervenor (granted on June 4, 2009)	⊠ E-mail	Farmington River Watershed Association	Eileen Fielding Farmington River Watershed Association 749 Hopmeadow Street Simsbury, CT 06070 (860) 658-4442 (860) 651-7519 fax efielding@frwa.org
Party (granted on June 4, 2009)	⊠ U.S. Mail	Citizens Against Overhead Power Line Construction	Citizens Against Overhead Power Line Construction c/o Richard Legere 1204 Newgate Road West Suffield, CT 06093 (860) 668-0848 (860) 668-0848 rlegere@cox.net

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LIST OF PARTIES AND INTERVENORS SERVICE LIST

Document Status Holder Representative			
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Intervenor (granted on JULY 16, 2009)	☑ U.S. Mail	Massachusetts Municipal Wholesale Electric Company (MMWEC)	Nicholas J. Scobbo, Jr. Bruce F. Anderson Ferriter Scobbo & Rodophele, PC 125 High Street Boston, MA 02110 (617) 737-1800 ext. 234 (617) 737-1803 fax nscobbo@ferriterscobbo.com
	⊠ U.S. Mail	·.	Edward Kaczenski Manager, Generation Services Massachusetts Municipal Wholesale Electric Company 327 Moody St., P.O. Box 426 Ludlow, MA 01056
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