



UIL HOLDINGS CORPORATION

157 Church Street, New Haven CT 06510-2100
203-499-2000

Via Hand Delivery and Electronic Mail

March 23, 2015

Robert Stein
Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Petition No. 1120 – The United Illuminating Company Petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is Required for the Proposed Modifications to the Hawthorne Substation at 180 Hawthorne Drive, Fairfield, Connecticut

Dear Chairman Stein:

Please find enclosed the original and fifteen (15) copies of The United Illuminating Company's ("UI") responses to Intervenor Vincent Giandurco's Interrogatories, dated March 16, 2015 in connection with the above-referenced Petition. Additionally, UI will electronically file all responses and attachments via siting.council@ct.gov.

Please do not hesitate to contact me at (203) 499-2422 if you have any questions regarding this filing.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Bruce L. McDermott', written over a white background.

Bruce L. McDermott
Managing Counsel – Operations
UIL Holdings Corporation
As Agent for The United Illuminating Company

cc: Service List

Enclosures

Interrogatory GIA-1

The United Illuminating Company
Petition 1120

Witness: Tony Buccheri
Page 1 of 1

Q-GIA-1: Please provide a list of all abutting property owners notified per statutory requirements as of March 17, 2015, and indicate the date of delivery of these notices.

A-GIA-1: See Affidavit of Service of Notice dated December 2, 2014 and Attachment GIA-1-1.

PETITION 1120
ATTACHMENT GIA-1-1
HAWTHORNE – ABUTTERS NOTIFICATION

| SENDER: COMPLETE THIS SECTION | COMPLETE THIS SECTION ON DELIVERY |
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| <ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. | <p>A. Signature <input checked="" type="checkbox"/> <i>E. Mury</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressed</p> <p>B. Received by (Printed Name) <input checked="" type="checkbox"/> <i>E. Mury</i> <input type="checkbox"/> Date of Delivery <input type="checkbox"/> <i>11/13/2017</i></p> <p>C. Date of Delivery <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p> |
| 1. Article Addressed to: | |
| <p>General Electric Company 3135 Easton Trpk. Fairfield, CT 06825</p> | |
| 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. | |
| 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes | |
| 2. Article Number (Transfer from service label) | 7008 1830 0004 7478 4872 |
| PS Form 3811, August 2001 Domestic Return Receipt 102595-02-04-1540 | |

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| <ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. | <p>A. Signature <input checked="" type="checkbox"/> <i>Mary R. Skarzynski</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressed</p> <p>B. Received by (Printed Name) <input checked="" type="checkbox"/> <i>Mary R. Skarzynski</i> <input type="checkbox"/> Date of Delivery <input type="checkbox"/> <i>11/11/17</i></p> <p>C. Date of Delivery <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p> |
| 1. Article Addressed to: | |
| <p>Mary R. Skarzynski 136 Hawthorne Dr. Fairfield, CT 06825</p> | |
| 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. | |
| 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes | |
| 2. Article Number (Transfer from service label) | 7008 1830 0004 7478 4889 |
| PS Form 3811, August 2001 Domestic Return Receipt 102595-02-04-1540 | |

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| 1. Article Addressed to: | |
| <p>Keith Cook 92 Hawthorne Dr. Fairfield, CT 06825</p> | |
| 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. | |
| 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes | |
| 2. Article Number (Transfer from service label) | 7008 1830 0004 7478 4896 |
| PS Form 3811, August 2001 Domestic Return Receipt 102595-02-04-1540 | |

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| 1. Article Addressed to: | |
| <p>First Selectman Michael C. Tetreau Sullivan Independence Hall 725 Old Post Road Fairfield, CT 06824</p> | |
| 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. | |
| 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes | |
| 2. Article Number (Transfer from service label) | 7008 1830 0004 7478 4865 |
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| 1. Article Addressed to: | |
| <p>Stephen P. Stolarski 112 Hawthorne Dr. Fairfield, CT 06825</p> | |
| 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. | |
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| 2. Article Number (Transfer from service label) | 7008 1830 0004 7478 4919 |
| PS Form 3811, August 2001 Domestic Return Receipt 102595-02-04-1540 | |

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| 1. Article Addressed to: | |
| <p>Joseph G. Almeida 160 Hawthorne Dr. Fairfield, CT 06825</p> | |
| 3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. | |
| 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes | |
| 2. Article Number (Transfer from service label) | 7008 1830 0004 7478 4902 |
| PS Form 3811, August 2001 Domestic Return Receipt 102595-02-04-1540 | |

PETITION 1120
 ATTACHMENT GIA-1-1
 HAWTHORNE – ABUTTERS NOTIFICATION

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Interrogatory GIA-2

The United Illuminating Company

Petition 1120

Witness: Matthew Cloud
Ron Rossetti

Page 1 of 1

Q-GIA-2: What was the date and results of the most recent required annual ElectroMagnetic Frequency Gauss level testing for both Hawthorne substation and adjacent power lines? Please attach a copy of the results.

A-GIA-2: See UI's response to Council Interrogatory CSC-II-2.

Interrogatory GIA-3

The United Illuminating Company
Petition 1120

Witness: Bohdan Katreczko
Page 1 of 1

Q-GIA-3: What were the results of any environmental testing performed on site prior to purchase from former owner, and in preparation for upcoming construction and operation? Please attach a copy of these results.

A-GIA-3: See UI's response to Interrogatory TOF-3.

Interrogatory GIA-4

The United Illuminating Company
Petition 1120

Witness: Bohdan Katreczko
Page 1 of 1

Q-GIA-4: Has UI investigated the potential affects that this plan will have on designated wetlands on and surrounding planned expansion site, and what have these investigations determined? Please attach a copy of any investigatory results on wetlands impacts.

A-GIA-4: See UI's response to Interrogatory CSC-004.

Interrogatory GIA-5

The United Illuminating Company
Petition 1120

Witness: Bohdan Katreczko
Page 1 of 1

Q-GIA-5: Please detail any stormwater retention and run-off plans for the site, and provide copies of any stormwater engineering reports for this site.

A-GIA-5: A copy of the detailed Stormwater Pollution Control Plan was submitted on March 16, 2015 in response to Town of Fairfield Interrogatory Set 1, Question 3. See *also* attachment TOF-3-C.

Interrogatory GIA-6

The United Illuminating Company
Petition 1120

Witness: _____
Page 1 of 1

Q-GIA-6: NO QUESTION 6 WAS INCLUDED IN THE INTERROGATORIES ISSUED BY
MR. GIANDURCO.

A-GIA-6:

Interrogatory GIA-7

The United Illuminating Company
Petition 1120

Witness: Bohdan Katreczko
Page 1 of 1

Q-GIA-7: Have any investigations taken place regard the impact of the proposed plan on the on-site habitat of the Eastern Box Turtle, a designated Species of Special Concern? Please attach a copy of any such investigation.

A-GIA-7: See UI's response to Interrogatory CSC-003-A - Stormwater Discharge Permit for the Hawthorne Substation Located at 180 Hawthorne Drive in Fairfield, Connecticut.

Interrogatory GIA-8

The United Illuminating Company

Witness: Matthew Cloud
Ron Rossetti

Petition 1120

Page 1 of 1

Q-GIA-8: Please provide data and/or other reasoning for increasing the number of lighting masts from three to eight.

A-GIA-8: See UI's response to Town of Fairfield Interrogatory TOF-II-3.

Interrogatory GIA-9

The United Illuminating Company

Witness: Matthew Cloud
Ron Rossetti

Petition 1120

Page 1 of 1

Q-GIA-9: Please explain why the increase in lighting fixtures was not included or visible in the Petition or Simulation.

A-GIA-9: The lighting fixtures will be located on the lightning masts, and those masts were depicted in the 3D rendering. The increase in the number of lighting fixtures was referenced in the Petition. Inclusion of the lighting fixtures in the simulation would not have affected the simulation as submitted to the council.

Interrogatory GIA-10

The United Illuminating Company

Witness: Matthew Cloud
Ron Rossetti

Petition 1120

Page 1 of 1

Q-GIA-10: Please provide any available data regarding the increase in lighting power, output, and visibility that will result from the increased number of masts and lighting fixtures?

A-GIA-10: See UI's response to Interrogatory TOU-II-7.

Interrogatory GIA-11

The United Illuminating Company

Witness: Matthew Cloud
Ron Rossetti

Petition 1120

Page 1 of 1

Q-GIA-11: Please explain why these highly visible aspects of the plan were not included in a highly detailed Simulation.

A-GIA-11: See UI's response to Interrogatory GIA-9

Interrogatory GIA-12

The United Illuminating Company

Witness: Matthew Cloud
Ron Rossetti

Petition 1120

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Q-GIA-12: The petition indicates that the expansion will require the cutting down of approximately 40 trees. Please indicate which trees will be cut down, whether the environmental impact of the removal of these trees was considered, and whether any alternatives were considered that would require less trees be removed.

A-GIA-12: See UI's response to Interrogatory TOU-II-14.

Interrogatory GIA-13

The United Illuminating Company
Petition 1120

Witness: Bohdan Katreczko
Page 1 of 1

Q-GIA-13: The substation site is a habitat for wild turkeys, many of which nest and sleep in the trees in and around the site. Please provide the results of any investigations that were performed as to the impact of the plan on wild fowl habitat.

A-GIA-13: UI submitted a Natural Diversity Database Request to the CT DEEP to identify any wild fowl habitat of State Special Concern and none were identified.

Interrogatory GIA-14

The United Illuminating Company
Petition 1120

Witness: Bohdan Katreczko
Page 1 of 1

Q-GIA-14: The substation site lies within a migratory pattern for many types of birds. These birds tend to nest at times in the trees in the vicinity of the substation, and also to feed in the immediate area. Please provide the results of any investigations that were performed as to the impact of the plan (specifically, the removal of these trees, and the addition of five tall lightning masts with high-intensity lighting fixtures) on bird migration patterns and the safety of migratory birds.

A-GIA-14: See UI's response to Interrogatory GIA-13.

Interrogatory GIA-15

The United Illuminating Company

Witness: Matthew Cloud
Ron Rossetti

Petition 1120

Page 1 of 1

Q-GIA-15: The construction phase of the project will include aluminum cutting. Please provide details as to how UI plans to mitigate the airborne dissemination of fine aluminum particles. Can this aluminum cutting and any other potentially hazardous activity be done off-site?

A-GIA-15: See UI's response to Interrogatory TOU-II-23.

Interrogatory GIA-16

The United Illuminating Company

Witness: Matthew Cloud
Ron Rossetti

Petition 1120

Page 1 of 1

Q-GIA-16: Large power-generating plant capacitors, such as those proposed for this expansion, have been known to suffer “catastrophic failure”, including explosion and fire. Please provide details as to how UI plans to mitigate this potentiality, and also to mitigate the potential property damage and harm done to human and animal neighbors if such failure does occur in the future.

A-GIA-16: See UI’s response to Town of Fairfield Interrogatory TOF-1.

Interrogatory GIA-17

The United Illuminating Company

Witness: Matthew Cloud
Ron Rossetti

Petition 1120

Page 1 of 1

Q-GIA-17: In what ways will UI mitigate the aesthetic impact of this proposed expansion and construction upon the abutting properties and the adjacent neighborhood?

A-GIA-17: The proposed fence line will utilize opaque slats to provide screening and enhanced physical security of new and existing equipment. Additionally, see UI's response to Council Interrogatory CSC-006. The Company has no additional details to provide at this time.

Interrogatory GIA-18

The United Illuminating Company
Petition 1120

Witness: David Bradt
Page 1 of 1

Q-GIA-18: According to a filing on the CSC website, UI plans to install a new substation in Fairfield in the year 2020. In a response given to the CSC on March 16, 2015, UI states that: "UI has no current plans for additional capacity upgrades at this substation in the ten year planning horizon." Which of these planning horizons is accurate?

A-GIA-18: As stated in CSC-II-7, UI has no current plans for additional capacity upgrades at this Hawthorne substation in the ten year planning horizon.

Annually, UI refreshes the ten year peak load forecast and assesses the load serving capacity of its substations throughout the ten year horizon. The reference to the conceptual new Fairfield substation appears to be from a dated 2011 assessment filed with the CSC. The most recent assessment filed in March of 2014 no longer includes the conceptual Fairfield substation since it is no longer needed within the 10 year planning horizon.

Interrogatory GIA-19

The United Illuminating Company
Petition 1120

Witness: David Bradt
Page 1 of 1

Q-GIA-19: Given the evidence of a plan for a new substation in 2020, is the currently proposed expansion of the current substation necessary?

A-GIA-19: This Hawthorne capacitor bank project is needed to meet UI's reliability compliance obligations to the New England Bulk Electric system. Please see A-GIA-18.

Interrogatory GIA-20

The United Illuminating Company
Petition 1120

Witness: Bohdan Katreczko
Page 1 of 1

Q-GIA-20: The Schiller-Hawthorne wetlands are critical to protecting the water quality of the nearby lakes and rivers. Wetland buffering areas are being cleared or reduced by the new addition. Given these reductions, what will protect the wetlands and the nearby lakes and rivers? Also, will the new construction require the clearing of the wetland's current natural vegetated buffering?

A-GIA-20: The proposed addition will not have any effect on the nearby lakes and rivers. The referenced wetlands are outside the UI property boundary and will not be impacted. Wetland buffering areas are not being cleared or reduced by the new modification. Vegetated buffers are not being added since the nearest inland wetland area was identified north of the substation and located outside of the property boundaries.