

STATE OF CONNECTICUT

SITING COUNCIL

**Re: 2006 Revision of the Electric and Magnetic
Field Best Management Practices**

**Petition 754
November 28, 2007**

**COMMENTS
of
THE CONNECTICUT LIGHT AND POWER COMPANY
and
THE UNITED ILLUMINATING COMPANY
on the
NOVEMBER 5, 2007 DRAFT
ELECTRIC AND MAGNETIC FIELD BEST MANAGEMENT PRACTICES**

Introduction:

The Connecticut Light and Power Company and The United Illuminating Company (collectively, the “Companies”) appreciate this opportunity to comment on the Council’s draft Electric and Magnetic Field Best Management Practices (“BMP”) issued for comment on November 5, 2007 (the “Draft”).

The Companies are pleased to note that the Draft is in substantial accord with the joint proposal of February 1, 2007 that the Companies submitted together with the Connecticut Department of Public Health, and the Companies support the adoption of the Draft. The Companies have only two substantive comments, which are set forth in the body of this submission; and several minor editorial suggestions, which are set forth on Exhibit A hereto, an annotated copy of the Draft.

Substantive Comments:

1. No-Cost / Low-Cost MF Mitigation (p.4)

The discussion at page 4 of the Draft, in the second paragraph under the heading “No-Cost/Low-Cost MF Mitigation,” should be revised to recognize the fact that “base line” transmission line designs typically already include “no cost” measures for lowering MF. For instance, where the designer of a line has a choice of specifying different phasings of the three conductors in a circuit (e.g., abc, bca, cab), and one choice will produce lower MF under typical anticipated conditions, without any impact on project cost, the designer will specify the low EMF phasing. The following paragraph of that same section of the discussion should reflect that the “4% of project cost” guideline for investment in low MF transmission line designs does not include the cost of “no-cost” measures. Accordingly, the Companies suggest the following revision. (Suggested deletions are indicated by [brackets]; suggested additions are indicated by underlining.)

The Council directs the Applicant to initially develop a Field Management Design Plan that depicts the proposed transmission line project designed according to standard good utility practice and incorporating “no cost” MF mitigation design features. [without regard for MF mitigation.] The Applicant shall then modify the base design by adding [no-cost] low cost MF mitigation design features specifically, where portions of the project are adjacent to residential areas, public or private schools, licensed child day-care facilities, licensed youth camps, or public playgrounds.

The [no-] cost of [/] low-cost design features should be calculated at four percent of the initial Field Management Design, including related substations...

2. MF Calculations

The Companies seek guidance with respect to the requirement of the first paragraph of the Draft following heading IV A., “MF Calculations” (p.6). The passage in question is:

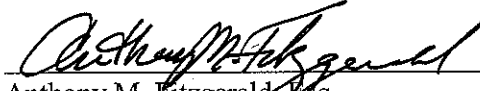
When preparing a transmission line project, an applicant shall provide design alternatives and calculations of MF for pre-project and post project conditions, under 1) peak load conditions, and 2) projected seasonal maximum 24-hour average current load on the line anticipated within five years after the line is placed into operation.

The meaning of requirement (2) is clear, but the Companies are uncertain as to what is meant by requirement (1). Is this calculation to assume the peak load that has actually occurred at the time of the application, that anticipated when the line is expected to be put into service, that anticipated on the same five year post in-service date as is used in (2) (so that the two values would relate to the peak hour and the 24-hour average on the same peak day), or some other time? Also, please note that, whatever date is chosen for (1), both specified calculations would relate to peak days, and neither would relate to more typical conditions. Accordingly, the Companies seek further clarification of this requirement in the final text.

Suggested Minor Editorial Revisions

Suggested minor editorial revisions are set forth in Exhibit A hereto. This exhibit is a copy of the text of the Draft, with suggested additions and deletions set forth in the same format using brackets and underlining used in this submission. Where the reason for the suggested revision is not self-evident, a Comment is included.

Respectfully submitted,



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