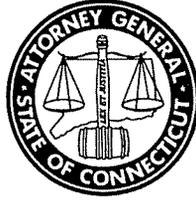


RICHARD BLUMENTHAL  
ATTORNEY GENERAL



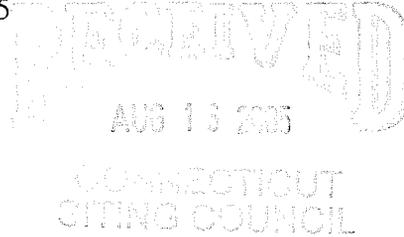
10 Franklin Square  
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Office of The Attorney General  
State of Connecticut

August 16, 2005

Mr. Derek S. Phelps  
Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051



**Re: Docket F-2005 – 2005 Ten Year Forecast of Electric Loads and Resources**

Dear Mr. Phelps:

Attached please find the second set of interrogatories submitted by Richard Blumenthal, Attorney General for the State of Connecticut ("Attorney General"), AG-43 through AG-49. These interrogatories are directed to ISO New England, Inc.

I certify service of this filing upon all parties and intervenors of record in this proceeding.

Very truly yours,

RICHARD BLUMENTHAL  
ATTORNEY GENERAL

BY:

Handwritten signature of Michael C. Wertheimer.

Michael C. Wertheimer  
Assistant Attorney General  
Attorney General's Office  
10 Franklin Square  
New Britain, CT 06051  
Tel: 860-827-2620  
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**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

2005 TEN YEAR FORECAST	:	DOCKET F-2005
OF ELECTRIC LOADS	:	
AND RESOURCES	:	AUGUST 16, 2005

**SECOND SET OF INTERROGATORIES SUBMITTED BY RICHARD BLUMENTHAL,  
ATTORNEY GENERAL FOR THE STATE OF CONNECTICUT,  
TO ISO NEW ENGLAND, INC.**

Richard Blumenthal, Attorney General for the State of Connecticut, hereby requests that ISO New England, Inc. answer the following interrogatories no later than August 26, 2005. In the event that the information requested herein has been provided in this proceeding, the respondent need only specifically identify where the responsive data or information is located in the record.

**I. DEFINITIONS**

A. As used in these interrogatories, "any" shall include "all," and "all" shall include "any," as needed to make the request inclusive and not exclusive.

B. As used in these interrogatories, "and" shall include "or," and "or" shall include "and," as needed to make the request inclusive and not exclusive. For example, both "and" and "or" mean "and/or."

C. As used in these interrogatories, "include" and "including" mean "including but not limited to."

D. As used in these interrogatories, "concern" and "concerning" mean "relate," "relating," "refer," "referring," "reflect," "reflecting," "about," "constitute" or "constituting."

E. As used in these interrogatories, "ISO-NE" means ISO New England, Inc. and its present or former subsidiaries, affiliates, branches, divisions, principals, associated persons,

control persons, directors, officers, employees, agents, trustees and beneficiaries. Each reference to ISO-NE shall be interpreted to include any, all, or any grouping or subgrouping of persons and entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

**F.** As used in these interrogatories, "document" means all materials and tangible forms of expression in any of the Applicants' possession, custody or control, whether drafts or unfinished versions, originals or nonconforming copies thereof, however, or by whomever prepared, created, produced, maintained, used, sent, received, dated, or stored (manually, mechanically, electronically or otherwise), including books, papers, records, files, notes, messages, bulletins, letters, chronologies, charts, studies, graphs, computer printouts, receipts, schedules, itineraries, declarations, affirmations, affidavits, deposition transcripts or other sworn, affirmed or unsworn statements, scripts, press releases, minutes, summaries, analyses, correspondence, memoranda, work papers, ledger sheets, confirmations, cables, wires, telecopies, facsimiles, telegrams, telexes, telephone logs, notes or records of conversations or meeting, contracts, agreements, notices or advertisements.

## II. INTERROGATORIES

**AG-43.** ISO-NE submitted a report entitled *Connecticut Energy Plan Framework – Recommended Solutions and Actions for the State of Connecticut* (“Report”) and dated January 4, 2005 to the Connecticut Energy Advisory Board (“CEAB”). According to this Report, the completion of Phase I of the Southwest Connecticut Reliability Project “will increase the import capacity into Southwest Connecticut by approximately 550 MW.” Report, 18. According to ISO-NE’s *2005 Resource Adequacy Analysis*, August 10, 2005 Draft (“Draft RAA”), however, the completion of Phase I of the Southwest Connecticut Reliability Project will increase the Southwest Connecticut import limit by 275 MW. Draft RAA, 24, Table 6.4.

- a. Please fully describe the difference between ISO-NE’s projection of the impact that the completion of the Phase I line would have on the import capacity into Southwest Connecticut in the Report and in the Draft RAA.
- b. Please fully describe what caused ISO-NE to change its analysis and conclusions regarding the impact that the completion of the Phase I line would have on the import capacity into Southwest Connecticut between January 4, 2005 and August 10, 2005.
- c. Provide all documents concerning the analysis that led to, or supports, ISO-NE’s change in position.
- d. Please describe ISO-NE’s present position regarding the impact that the completion of the Phase I line would have on the import capacity into Southwest Connecticut.
- e. Please fully describe the practical impact to Connecticut and New England from this change.

**AG-44.** In its Report, ISO-NE states that “[r]esults of operable capacity analyses conducted during RTEP04 projected a shortfall of 130 MW in Southwest Connecticut in 2004 to meet the 90/10 summer peak load forecast plus operating reserve requirements, which increases to approximately 270 MW by year 2007.” Report, 7 (Footnote omitted). In the Draft RAA, however, the shortfall of operable capacity in Southwest Connecticut falls from 143 MW in 2006 to 88 MW in 2007 and declines each year thereafter. Draft RAA, 25, Table 6.5.

- a. Please explain the differences in these amounts and provide all documents relating thereto.
- b. Did ISO-NE consider the impact of the so-called “gap” RFP resources in the Report and/or the Draft RAA?

**AG-45.** According to the Draft RAA, “the required amount of required reserve in Greater Southwest Connecticut increases with the addition of the Phase II transmission improvements.” Draft RAA, 32. In addition, “[o]nce Phase II of the Southwest Connecticut Reliability Project is in-service, currently assumed to be December 2009, another 350 MW of quick-start resources would be required in this area to meet the increase in operating reserve requirements.” Draft RAA, 32.

- a. Please explain in detail the basis for this conclusion.
- b. Please explain in detail whether the addition of the Phase II line in Connecticut have the practical effect of increasing the amount of generating capacity that will be required in Connecticut? If so, explain how and why.
- c. Please explain in detail whether the addition of the Phase II line in Connecticut will have the practical effect of increasing costs in Connecticut, other than the cost of the transmission lines themselves, including costs associated with LICAP, as submitted to the Federal Energy Regulatory Commission or as approved by a FERC administrative law judge in an initial decision dated June 15, 2005.
- d. Please provide documents concerning this conclusion, including planning studies.
- e. Please describe the net benefit from Phase II during peak hour operating conditions on operable capacity (after accounting for both the increase in transfer capacity and the impact of the required increase in operating reserves)?

**AG-46.** Please define “Greater Southwest Connecticut” as it is used in the Draft RAA. See, e.g. Draft RAA, 23-25; Figure 6.8; Tables 6.4 and 6.5. Please also explain any difference between Greater Southwest Connecticut as it is used in the Draft RAA and “Southwest Connecticut” as it is used in the Report. See, e.g. Report, 7.

**AG-47.** Please define “Greater Connecticut” as it is used in the Draft RAA. See, e.g. Draft RAA 26; Figure 6.9; Tables 6.6 and 6.7.

**AG-48.** Compare the projected operable capacity margins shown in Tables 6.4 and 6.5 of the Draft RAA for Greater Southwest Connecticut with the projected operable capacity margins shown in Tables 6.6 and 6.7. for Greater Connecticut.

- a. Please fully describe the basis for concluding that the capacity margins in Greater Connecticut are greater (proportionate to peak load) than for Greater Southwest Connecticut in each year of the forecast, and provide all documents relating thereto?

- b. Please fully describe the assumptions concerning the generating resources and transfer capacity into Greater Southwest Connecticut and Greater Connecticut that were applied in these analyses, and provide all documents relating thereto.

**AG-49.** According to the Report, the Southern New England Reinforcement Project is projected to go into service in 2008. Report, 18. According to the Draft RAA, however, the Southern New England Reinforcement Project is “targeted for completion by the summer of 2012.” Draft RAA, 26.

- a. Please explain in detail the difference in these projections.
- b. Please explain in detail all reasons for the apparent delay of this project.
- c. Please provide ISO-NE’s current projected in-service date for this project.