

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

CONNECTICUT SITING COUNCIL REVIEW OF THE : Docket F-2007
TEN-YEAR FORECAST OF CONNECTICUT ELECTRIC :
LOADS AND RESOURCES : August 14, 2007

COMMENTS OF THE UNITED ILLUMINATING COMPANY
ON DRAFT REPORT

The United Illuminating Company ("UI") appreciates the opportunity to participate in the Siting Council's review of the Ten-Year Forecast of Connecticut Electric Loads and Resources. The Council has compiled a comprehensive draft report. UI offers the following comments on the Council's June 6, 2007 Draft Report.

In the Council's discussion of "Growth in Peak Loads" (Draft Report, page 3), UI suggests adding a discussion concerning UI's recent experience concerning reaction to the increase in the price of power purchased by UI to serve its standard service and last resort service customers. While UI's fully bundled prices were relatively flat in 2003 through 2005 and into 2006, actual sales in calendar year 2006 went down as compared to sales in 2005. Then through the first quarter of 2007, following UI's January 2007 price increase, sales remained relatively stable compared to first quarter 2006 sales. 6/12/07 Tr. at 108-09 (Testimony of M. Coretto); Attachment LF-1-1.

UI suggests that Figure 2 in the Draft Report (State and Utility Peak Load in MW) be separated into separate charts. As drafted, interpretation of the Figure is difficult since it includes different data sets for comparison in the same graph (i.e., extreme load forecast, normal load forecasts (50/50) and conservation impacts). Instead of listing each of the load forecasts in one figure, UI suggests that like data be grouped together. For example:

- Group “ISO-NE 90/10 CT Forecast Peak” and “CT Utilities’ Peak Extreme Weather” together since these two forecasts are basically extreme weather peak forecasts.
- Group “CT Utilities’ Peak w/o conservation” with “CT Utilities’ Peak w/conservation” since these are both 50/50 forecasts, and differ as to whether they are with and without conservation.
- Group “CL&P Peak” with “UI Peak” and “CMEEC Peak”, since these are all 50/50 forecasts and actual historical peaks that, when added together, are equal to the “CT Utilities’ Peak w/conservation”.

In the Draft Report’s discussion of “Legislation Affecting Electric Supply,” UI suggests the final report include a discussion of Public Act 07-242, *An Act Concerning Electricity and Energy Efficiency* (the “Act”) and Public Act No. 07-1 (Special Session), *An Act Concerning The State Budget for the Biennium Ending June 30, 2009, and Making Appropriations Therefor*. The Act provides for the development of a comprehensive plan for the procurement of energy resources including conventional and renewable generating facilities, energy efficiency, load management, demand response, combined heat and power facilities, distributed generation and other emerging

energy technologies. The Act further requires that this be done by electric distribution companies in order “to meet the projected requirements of their customers in a manner that minimizes the cost of the resources to consumers while maximizing customer benefits consistent with the state’s environmental goals and standards.” *See* Act, Section 51(a). The Act seeks to ensure that the capacity goals of the state are met at the least cost to customers by requiring the electric distribution companies to consider a combination of alternatives.

The Act also mandates that each year the electric distribution companies develop and implement a plan for the procurement of energy resources, which plan must consider: (i) approaches to maximizing the impact of demand-side measures; (ii) the extent to which generation needs can be met by renewable and combined heat and power facilities; (iii) the optimization of the use of generation sites and generation portfolio existing within the state; (iv) fuel types, diversity, availability, firmness of supply and security and environmental impacts thereof, including impacts on meeting the state’s greenhouse gas emission goals; (v) reliability, peak load and energy forecasts, system contingencies and existing resource availabilities; (vi) import limitations and the appropriate reliance on such imports; and (vii) the impact of the procurement plan on the costs of electric customers. Act, Section 51(d); Section 52.

Finally, UI requests that the Council add the following to page 27, Figure 8:

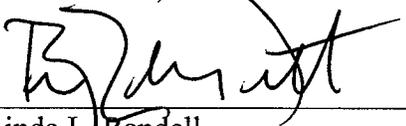
Install the new 115-kV Trumbull Substation

2008

UI

Respectfully submitted,

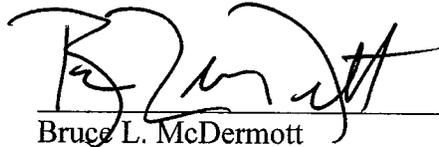
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CERTIFICATION

This is to certify that on this 14th day of August, 2007 an original and twenty (20) copies of the foregoing were hand-delivered to The Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 and one (1) copy was sent via electronic mail or mailed, postage prepaid, on this 14th day of August, 2007 to all other known parties and intervenors.


Bruce L. McDermott