

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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CONNECTICUT SITING COUNCIL REVIEW :  
OF THE TEN-YEAR FORECAST OF :  
CONNECTICUT ELECTRIC LOADS AND :  
RESOURCES :

F-2007

JULY 12, 2007

**WRITTEN COMMENTS OF THE CONNECTICUT LIGHT AND POWER COMPANY**

**I. INTRODUCTION**

The Connecticut Light and Power Company ("CL&P" or "Company") hereby submits the following written comments on the draft report entitled "Review of the Ten-Year Forecast of Connecticut Electric Loads and Resources" ("Draft Report") issued by the Connecticut Siting Council ("Council"). CL&P appreciates having the opportunity to participate in this important forum on energy industry issues. These written comments will supplement the information provided by the Company during the hearing process phase of this docket, and will discuss issues of importance to the Company as well as technical comments on the Council's Draft Report.

CL&P believes that the Council and its Staff have done an excellent job of concisely documenting utility data and industry developments from various sources into the Draft Report. CL&P is pleased that the Draft Report recognizes the very important issues facing the electric industry in Connecticut such as fuel diversity and the need for adequate transmission facilities.

**II. DISCUSSION**

**A. The Siting Process Remains Vitaly Important**

The Connecticut Siting Council (the "Council") and the siting process as administered by the Council is vital to the development of critical infrastructure improvements in a way that balances need for such improvements with the protection of the environment. These

improvements are needed to facilitate reliability, efficiency, and the growth of energy markets for the benefit of the state and New England. In this rapidly changing industry, the process for siting and approval of critically needed transmission projects must be predictable and expeditious.

**B. Transmission Upgrades and Enhancements Are Essential For Connecticut's Energy Future**

Connecticut needs a transmission system capable of transporting energy where it is needed, when it is needed. As the Council is well aware, existing transmission lines are at capacity and operators are pushing voltage limits more and more. During the summer of 2006, Connecticut (including CL&P, UI and CMEEC) experienced a peak demand of approximately 7,400 MWs. In-state generation capacity is about 7,300 MWs, and Connecticut can reliably import about 2,500 MWs of power. It is becoming increasingly likely that generator or transmission outages and the potential retirement of aging and uneconomic generation will produce the situation in which in-state generation and transmission imports cannot meet the growing summer peak power demands.

The need for major southern New England transmission reinforcements was first identified by ISO-New England ("ISO-NE") in their 2005 Regional System Plan. In 2006, ISO-NE, Northeast Utilities, and National Grid completed the identification of four new transmission projects to benefit the region, including 1) a new 345-kV transmission line connecting National Grid's service territory in Massachusetts and Rhode Island with CL&P's service territory which, when combined with the upgrades shown below, will increase the east-west power transfer capability across New England; 2) new and modified 115-kV and new 345-kV transmission facilities, including a new 345-kV transmission line connecting Connecticut and western Massachusetts to address reliability problems in the Springfield, Massachusetts area; 3) new and modified 115-kV and new 345-kV transmission facilities to address reliability problems associated

with the increased transfer of power from eastern Connecticut to western and southwestern Connecticut, and 4) new and modified 115-kV and new 345-kV transmission facilities would address reliability problems associated with Rhode Island's limited access to the 345-kV system and over-dependence on local generation. Collectively, these four projects are referred to as the New England East-West Solution ("NEEWS"). CL&P expects NEEWS to significantly increase the transmission import capability into Connecticut with estimates ranging from 1,100-1,700 MW. CL&P anticipates the siting of these facilities in each of the three states as required is scheduled to begin in 2008.

**C. The General Assembly Has Taken Steps to Increase Local Planning for Resource Commitments within Connecticut**

Public Act 07-242, *An Act Concerning Electricity and Energy Efficiency* ("the Act") established a new annual process in which electric distribution companies will submit to regulatory agencies an assessment of the state's energy and capacity resources and a plan for the procurement of energy resources, conventional, distributed, and renewable generation, energy efficiency and demand response, and emerging technologies. Such plan will initially be submitted to the Connecticut Energy Advisory Board, and, subsequently, to the Department of Public Utility Control for approval.

With these new processes in place, it may be appropriate to consider ways in which the Council might consider how this current proceeding (the Ten Year Forecast of Loads and Resources) can be adapted to fit within this new overall regulatory oversight process. CL&P suggests that the Council initiate a technical conference to consider this matter.

**D. Energy Efficiency Can Be an Important Component of a Resource Portfolio**

Energy efficiency is an important component in the planning process and CL&P has for decades supported its use as part of a portfolio of electric resources necessary to meet customer

needs. The Act also calls for increased reliance on efficiency to manage the growth in electric peaks, and CL&P is pleased to report that the general assembly has restored previously-diverted funding levels for such programs.

However, energy efficiency, while important and a priority, is but one option that needs to be recognized along with sufficient generation and transmission in an appropriate resource plan. Regardless of resource technology, it is essential that sufficient capacity is available when and where it is needed, so that customers are provided with a reliable electric energy system, and the benefits and opportunities that such a system enables.

### **III. TECHNICAL COMMENTS**

The Company provides the following technical comments to the Council's Draft Report:

- Page 3, First sentence. The forecast itself does not decrease any risk. Rather, it shows where there the problems lie. Action must be taken to actually decrease risk. CL&P recommends this sentence be replaced with the following: "An integrated forecast of loads and resources helps to identify when electric demand is projected to exceed supply."
- Page 3, Third paragraph in "Growth in Peak Loads" section. These are not the actual peak loads for Connecticut. They are the sum of the non-coincident company peak loads. The actual peaks loads for CT, as reported by ISO-NE at [http://www.iso-ne.com/markets/hstdata/znl\\_info/hourly/index.html](http://www.iso-ne.com/markets/hstdata/znl_info/hourly/index.html), are 6357 MW in 2004, 7012 in 2005 and 7367 in 2006.
- Page 3, Third paragraph in "Growth in Peak Loads" section. In this same paragraph is the superscript for footnote 5. This superscript should be removed and on page 4, paragraph 2, the superscript for note 6 should be changed to refer to footnote 5.

### **IV. CONCLUSION**

The Company appreciates the opportunity to participate in this proceeding and to provide its comments to the Council's Draft Report. CL&P hopes that these comments are helpful to the Council as it continues to address the energy issues facing the State of Connecticut.

RESPECTFULLY SUBMITTED this 12th day of July, 2007.

THE CONNECTICUT LIGHT AND  
POWER COMPANY



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