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**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

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**CONNECTICUT SITING COUNCIL REVIEW :** F-2008 **CONNECTICUT**  
**OF THE TEN-YEAR FORECAST OF :** **SITING COUNCIL**  
**CONNECTICUT ELECTRIC LOADS AND :**  
**RESOURCES :** **AUGUST 14, 2008**

**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 ("the Council"). CL&P appreciates having the opportunity to participate in this important forum on energy industry issues. These written comments will supplement not only the information provided by the Company during the hearing process phase of this docket, but also the August 4, 2008 letter sent from Lisa Thibdaue to the Council, and will discuss 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 to upgrade transmission infrastructure.

## II. TECHNICAL COMMENTS

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

- Page 2, second full paragraph, first sentence. The words "and planning" should be added after the word "market" such that the sentence should read, "ISO-New England Inc. ("ISO-NE") operates the grid in New England and oversees the wholesale electric market and planning in this region."
- Page 2, under the Load section, first paragraph, second sentence. The word "generally" should be deleted, such that the sentence would read, "Connecticut experiences its peak load (i.e. highest load of the year) during a summer day."
- Page 9, penultimate paragraph, first sentence. The word "peak" should be inserted after "of" and before "electric", such that the sentence would read, "On the surface, this essentially flat growth in energy consumption may seem counterintuitive and even inconsistent given the 1.37 percent ACGR of peak electric load growth in the state."
- Page 12, first paragraph, second sentence. The phrase "and load management" should be inserted after "support energy efficiency", such that the sentence would read, "The CEEF is a fund raised to support energy efficiency and load management programs and initiatives via a surcharge on customer electric bills."
- Page 12, second paragraph, first sentence. The phrase "stress on Connecticut's transmission lines" should be replaced with the phrase "peak electric demand", such that the sentence would read, "These programs are implemented and administered by CL&P and UI, who are also accountable for the attainment of established performance goals approved by the DPUC and ECMB, including the reduction in overall energy consumption and the reduction of peak electric demand."
- Page 12, third paragraph, second sentence. The word "an" should be replaced with the word, "annual", such that the sentence would read, "In the ECMB report dated March 1, 2008, the ECMB notes that the CEEF programs (for CL&P and UI) resulted in annual energy savings of 355 million kWh or 355 GWh."
- Page 12, third paragraph, third sentence. The phrase "will be" should be replaced with the phrase "have been", such that the sentence would read, "As a result of CEEF programs administered during the time period of 2000-2007, ECMB estimates that 31 billion kWh or 31,000 GWh have been saved during the lifetime of the energy efficiency measures."
- Page 12, fifth paragraph, first sentence. The phrase "including Energy

Independence initiatives” should be added to the end of the sentence, such that the sentence would read, “CL&P reports a projected load reduction of 695 MW in 2008 due to C&LM including Energy Independence initiatives.”

- Page 12, last paragraph. A footnote should be added explaining that the peak load reduction due to C&LM includes Energy Independence Act initiatives, excluding third party contracts.
- Page 15, Table 1. Several in-service dates for Project 150 projects have been updated.

**Round 1**

Watertown Renewable Power	Watertown, CT	1-Apr-2011
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**Round 2**

Plainfield Renewable Energy	Plainfield, CT	1-Nov-2010
DFC-ERG Milford	Milford, CT	1-Dec-2008
Clearview Renewable Energy	Bozrah, CT	1-Dec-2011
Clearview East Canaan Energy	North Canaan, CT	1-Jun-2010
Hospital Energy Development (Waterbury Hospital)	Waterbury, CT	9-Jun-2009
Hospital Energy Development (Stamford Hospital)	Stamford, CT	1-Oct-2009
<i>South Norwalk Renewable Generation<sup>(1)</sup></i>	<i>South Norwalk, CT</i>	<i>1-Mar-2010</i>

Notes:

(1) On August 8, in Docket No. 07-04-27, this contract was filed with the DPUC for its approval.

- Page 24, Legislation Affecting Supply, An Act Concerning Energy Independence. A paragraph should be added explaining the near term decision programs, such as load response. “The Connecticut Energy Efficiency Fund (CEEF) offers financial incentives and technical support to customers for energy-efficiency improvements to their businesses and facilities. Incentives for peak demand reduction (kW) are a major focus of the programs. The Load Response programs provide additional incentives to customers who shed load or run emergency generators during peak demand events. Customers do not have to receive a monetary grant to be eligible for CEEF program incentives. There are also special incentives offered for customers located in southwest Connecticut.”
- Page 26, under the Renewable Portfolio Standards section, second paragraph. “Figure 5” should be replaced with “Figure 4” such that the sentence would read, “Figure 4 depicts the required percentages for Class I and Class II renewable energy sources through 2020.”
- Page 27, fourth paragraph. “January 1, 2008” should be changed to “January 2, 2008.”
- Page 27, fourth paragraph. The IRP’s four recommendations should be added.: (1) Maximize the use of demand side management, within practical operational and economic limits, to reduce peak load and energy

consumption; (2) Explore other power procurement structures such as longer term power contracts on a cost-of-service basis with merchant and utility owners of existing and new generation; (3) Evaluate the structure and costs of Connecticut's renewable portfolio standard in the context of a regional re-examination of the goals and costs of similar policies in New England; and (4) Consider potential ways to mitigate the exposure of Connecticut consumers to the price and availability of natural gas.”

- Page 27, fifth paragraph, second bullet. Delete the phrase “at current levels”, such that the bullet would read, “the IRP forecasts continued funding of C&LM initiatives”.
- Page 28, fourth full paragraph, second sentence. “138-kV” should be replaced with “345 kV”, such that the sentence would read, “CL&P’s remaining AC transmission is rated between 69 kV and 345 kV.”
- Page 29, under the Lake Road Generating Facility section, second sentence. The word “lighting” should read “lightning”, such that the sentence would read, “Transmission lines can be out of service for several reasons such as a fault (i.e. short circuit) or a lightning strike.”
- Page 30, first paragraph. The transmission line from Lake Road to Sherman Road is erroneously referred to as the #347 circuit. Since the completion and interconnection of Killingly Substation, the #347 circuit is the transmission line from Killingly to Sherman Road. The #3348 circuit is the transmission line from Lake Road to Killingly.
- Page 30, second paragraph, first sentence. The sentence should be modified to read, “The SPS was then modified to protect Lake Road units by tripping them off in the event of the loss of the #3348 or #347 circuit and the restoration of both the #3348 and #347 circuits.”
- Pages 30-31, under the New England East-West Solution Section. NEEWS is a transmission plan including more than one project; thus, an “s” should be added to “project” when referring to NEEWS projects.
- Page 31, third full paragraph, first sentence. “2007” should be replaced with “2008”, such that the sentence would read, “The ISO-NE technical approval process is scheduled to be completed in 2008.”
- Page 31, third full paragraph, second sentence. Replace second sentence with, “CL&P expects the aggregate of the Southern New England transmission reinforcements to significantly increase the import capacity into Connecticut, by approximately 1100 MW of additional capacity, although even higher levels are possible.”
- Page 32, Figure 5, first entry. The word “the” should be replaced with the word “a”, such that the entry would read, “Install a new 115- to13.8-kV Wilton Substation.”

- Page 33, Figure 5, last entry. Estimated in-service date (currently reported as “TBD”) should be replaced with 2012 and the name (currently reported as “Sherwood Substation”) should be replaced with “New Westport Substation”.
- Page 34, fourth paragraph, first bullet. Delete the phrase, “until the Phase II transmission upgrade is completed,” such that the bullet would read, “maintain sufficient emergency generation and demand response in SWCT.”
- Page 34, fourth paragraph, fifth bullet. Delete “conservation” and replace it with “additional energy efficiency” and add “as recommended in the IRP”, such that the bullet would read, “encourage additional energy efficiency and demand response as recommended in the IRP.”
- Appendix B, the projected in-service date for the Greater Springfield Reliability Project is mid-2013 and the projected in-service date for the Interstate Reliability Project is late-2012.
- Appendix B, there should be a second entry for “East Devon S/S, Milford - Devon S/S, Milford (new circuit #2, overhead) CL&P 1.3 115 2009”.
- Appendix B is missing line items for the NEEWS changes to circuits #1768 and #383.
- Appendix B labels the #310 and #368 circuit changes as upgrades, when, in fact, they are modifications.

### **III. 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 Connecticut.

RESPECTFULLY SUBMITTED  
THE CONNECTICUT LIGHT  
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