

STATE OF CONNECTICUT
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STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

CONNECTICUT SITING COUNCIL : LIFE CYCLE 2011
INVESTIGATION INTO THE ELECTRIC :
TRANSMISSION LINE LIFE-CYCLE COSTS : OCTOBER 21, 2011

**INTERROGATORIES OF THE
OFFICE OF CONSUMER COUNSEL**

The Office of Consumer Counsel (OCC) requests responses to the following interrogatories by The Connecticut Light and Power Company (CL&P) and The United Illuminating Company (UI) on or before **November 3, 2011**. All interrogatories except OCC-7(a) are addressed to CL&P. Interrogatories OCC-1, -3, -4(b), -5, -7(a), - 8, -11 through -15, and -17 are addressed to UI.

Should there be any questions, please contact the undersigned as soon as possible.

OCC-1 **(CL&P and UI)** Reference Response to CSC-001. Provide details on the work force used for operations and maintenance, including the number of workers by job title, the number of supervisors, and whether the workers are employees of the utility, or from an outside contractor.

For FERC accounts 560 and 568 (operations and maintenance supervision accounts), provide a best estimate of the costs for these supervisory functions by overhead and underground lines. The cost estimate may be in the form of a supervisory loading percentage.

OCC-2 **(CL&P)** Ref. Response to CSC-001. For underground costs in 2007 and 2009, provide the following: (a) details of the referenced "significant events"

impacting underground costs and (b) a breakout of the dollar amount of the “significant events” costs for 2007 and 2009.

- OCC-3 **(CL&P and UI)** Ref. Responses to Interrogatories CSC-002 and -004.
Provide the depreciation life by transmission plant categories as listed in the Responses to CSC-002 and -004.
- OCC-4 Ref. Response to CSC-002. Provide the following additional information for costs associated with overhead lines:
- (a) **(CL&P)** The calculation for the total cost of capital over the life of the plant using CL&P’s current cost of debt and, for the equity portion, use the NEEWS project’s return on equity (ROE) with FERC-approved incentives totaling 12.89%.
 - (b) **(CL&P and UI)** Average embedded land cost per mile.
- OCC-5 **(CL&P and UI)** Ref. Response to CSC-004. For underground lines, provide the same information as requested in the previous interrogatory.
- OCC-6 **(CL&P)** Ref. Response to CSC-004. Provide the following additional information:
- (a) Include the cost of the required pressurization plants in the HPFF underground line cost.
 - (b) Provide the current average cost for a shunt reactor. Then, using CL&P’s number of reactors for current plant, and the associated circuit miles, provide an average per-mile cost for a reactor.

- (c) Provide the current average cost of an overhead-to-underground transition station. Then, using CL&P's current number of stations, and associated circuit miles, provide an average per mile cost for a station.
- (d) Provide the current average cost for a splicing vault. Then, using CL&P's current number of vaults, and associated circuit miles, provide an average per mile cost for a vault.

OCC-7 **(CL&P and UI)** Ref. Response to CSC-005.

- (a) **UI:** Provide an itemization of the costs included in the overhead and underground categories. Explain why the overhead costs per mile are so much higher than the underground costs per mile.
- (b) **CL&P:** Provide an itemization of the costs included in the overhead and underground categories. Explain why the underground costs per mile are so much higher than the overhead costs per mile.

OCC-8 **(CL&P and UI)** Provide the operations and maintenance (O&M) costs to date for the underground Bethel-to-Norwalk 345kV XLPE cable lines.

Include O&M costs for associated overhead-to-underground transition stations and cable splicing vaults. Detail in narrative form the experience to date with operating and maintaining these underground lines.

OCC-9 **(CL&P)** Has CL&P used polymer insulators? If so, detail the company's experience with them.

OCC-10 **(CL&P)** Ref. Response to CSC-011. Specify the five project sites with the most costly contamination and/or environmental management issues over the last five years. Detail actions taken and the associated costs.

- OCC-11 **(CL&P and UI)** Explain how ISO-New England allocates the cost of spare parts between the regional and the local levels.
- OCC-12 **(CL&P and UI)** Explain how electric and magnetic fields are monitored at underground and overhead transmission plant sites. Specify whether all sites or only certain sites are actively monitored. Summarize monitoring results for the past three years, and include the cost of monitoring.
- OCC-13 **(CL&P and UI)** Ref. *Life Cycle 2007* Report (2007 Report), pp. 20-23. In comparing underground to overhead costs, the 2007 Report includes issues such as land costs, materials cost escalation, degree of complexity, and transient voltages. Regarding other types of costs associated with the Bethel-to-Norwalk undergrounding that have a significant impact on Connecticut consumers, provide the average per-mile costs charged to Connecticut consumers due to: (a) localization of the underground line by ISO-New England, and (b) the added 46 basis points ROE incentive that was secured from FERC for use of “advanced technology” related to the length of the underground line.
- OCC-14 **(CL&P and UI)** Ref. *Life Cycle 2007* Report, p. 31. Provide an update to Table 6-1 in the 2007 Report. List percentages for all loadings on labor reflected in the costs including, but not limited to, a breakdown of each benefit, all taxes, training, vehicles, payroll and human resources costs.
- OCC-15 **(CL&P and UI)** Ref. *Life Cycle 2007* Report, pp. 45 and 46. Provide a breakdown of dollar amounts for each of the items included in the Administrative category.

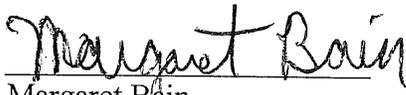
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OCC-16 (CL&P) Ref. Life Cycle 2007 Report, p. 57. Regarding the Glenbrook Cables project's empty duct that ISO-New England localized to Connecticut ratepayers: Compare and contrast the cost of the empty duct with the duct-related costs on p. 57 in the 2007 Report. Explain and quantify the cost differences.

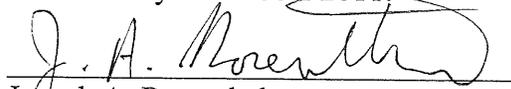
OCC-17 (CL&P and UI) Explain how the cost of line losses is calculated and illustrate with an example of the calculation formula.

Respectfully submitted,

ELIN SWANSON KATZ
CONSUMER COUNSEL

By: 
Margaret Bain
Associate Rate Specialist

I hereby certify that a copy of the foregoing has been mailed, electronically filed, and/or hand-delivered to all known parties and intervenors of record this 21st day of October 2011.


Joseph A. Rosenthal
Commissioner of the Superior Court