

DOCKET NO. 435 - The Connecticut Light & Power Company } Application for a Certificate of Environmental Compatibility } and Public Need for the Stamford Reliability Cable Project, } which consists of construction, maintenance, and operation of a } new 115-kV underground transmission circuit extending } approximately 1.5 miles between Glenbrook and South End } Substations, Stamford, Connecticut and related substation } improvements.	Connecticut Siting Council September 5, 2013
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Concurring Opinion, In Part Dissenting

This Docket proposes the construction of a 115-kV underground cable 1.4 miles between Glenbrook Substation and South End Substation, both located in the City of Stamford. It is required to serve the growing loads in the Stamford - Greenwich area and to respond to the reliability criteria promulgated by NERC (National Electric Reliability Council). It has been approved by the Independent System Operator of New England (ISO-NE), and is estimated to cost \$46.9 million, of which \$3 million is for facilities at the terminating substations. By action this day, the project has been approved by the Connecticut Siting Council.

Based upon the evidence presented in this Docket, these Members also voted to approve this Docket. Need is clearly evident; even the most casual observer can understand that the huge amount of commercial growth in the area translates into greater electric loads. Similarly, construction of an underground electric line involves no “significant adverse environmental effect” (using the language of the pertinent statute). But this vote is made with some material reservations as discussed below:

1. The cost of the proposed project is extremely high - approximately \$5,800 per **foot**. Because ISO-NE is likely to give final approval to the project, its cost will be allocated across all of New England. Only about 25% will be borne by Connecticut ratepayers. This allocation of costs could easily be argued to create a “small” burden upon the State. We find this logic specious. While Connecticut’s utility transmission plant may well be regionalized, 25% of the transmission plant costs of the other New England states is borne by Connecticut. This is a rational procedure to smooth and share in costs which have benefit to the region even though located on only one system. But what it means, practically, is that there is less incentive in any one project to be extremely creative and keep project costs as low as possible. In the long term, however, “what goes around, comes around” and high project costs will hurt the ratepayer.

To our mind, \$5,800 per **foot** is extremely disturbing. Although it can pass judgment on project need and environmental effect, the Siting Council has negligible authority to evaluate and regulate project costs. The applicant made a case under inquiry that this is a realistic cost figure. That may be, but we are concerned that what is needed is a thorough and intense review by this applicant (and any other in a comparable position) as how to drive down these costs. For example, we are uneasy that heavy reliance on consultants is as efficient and effective as in-house professional staff. From personal experience, in-house staff develops a healthy storehouse of wisdom on specific local facilities which can lead to imaginative physical solutions. Could that be beneficial in this case? Out-of-the-box thinking is critical for cost management. Subsequent projects **MUST** pay greater attention to capital and operating costs if electrical energy costs are to be held in check. In short, do a better job for less.

2. NERC is a major factor in defining the level of transmission reliability and how it should be best achieved. We have no quarrel with this approach to system planning, and, in the specific circumstances at hand, the call for another circuit between the proposed terminals. It is our observation that Connecticut utilities have made a strong effort to comply with NERC guidelines. But our observation also is that this effort is not taken as seriously as in other jurisdictions (and differs considerably in other countries). An important NERC guideline requires “critical” transmission circuits to be completely separate, and not share a common structure (which would otherwise reduce costs.) Yet, recent construction of a new 500-kV double circuit line on a single structure in New Jersey is completely contrary to what ISO-NE would allow in Connecticut. Similarly, New York City is now served over 345-kV lines from up-state on double circuit towers. Because of their extremely critical nature, we believe NERC guidelines would require that these lines be placed on single circuit support structures. We are completely unaware of any plans to accomplish such a change. There can be no objection to efforts to improve reliability in Connecticut. But if other jurisdictions are ignoring these efforts, it puts Connecticut ratepayers at a material disadvantage by forcing higher energy costs. While not fully applicable in this project, such significant requirements should be made consistent across the board. The Council and the applicant must place greater consideration on reliability consistency in facility design and planning. Accordingly, we recommend that ISO-NE be required to participate in future dockets regarding transmission reliability since, in previous matters, it has been acknowledged to have the dominant role.

Nonetheless, these admonitions notwithstanding, we vote to APPROVE this Docket.

Philip T. Ashton, Member
Daniel P. Lynch, Jr., Member
Connecticut Siting Council