

STATE OF CONNECTICUT

SITING COUNCIL

CSC REGULATIONS REVISIONS – Amendments to Regulations Relating to the Rules of Practice of the Council, Sections 16-50j-1 to 16-50z-4, inclusive, and Sections 22a-116-B-1 to 22a-116-B-11, inclusive, of the Regulations of Connecticut State Agencies	December 23, 2011
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SUPPLEMENTAL COMMENTS OF THE CONNECTICUT LIGHT AND POWER COMPANY REGARDING AMENDMENTS TO REGULATIONS RELATING TO THE RULES OF PRACTICE OF THE COUNCIL

The Connecticut Light and Power Company (“CL&P”) respectfully files these supplemental comments regarding Amendments to Regulations relating to the Rules of Practice of the Council pursuant to the Council’s Notice of Intent to Amend Regulations, as published in the Connecticut Law Journal on October 25, 2011. CL&P previously filed written comments dated November 23, 2011.

Sections 16-50j-56 through 58 Energy Facilities Exempt Modifications:

CL&P emphasizes its support for this streamlined procedure for modifications to energy facilities that will not have a substantial adverse environmental effect. As noted in the remarks of John R. Morissette on behalf of CL&P at the Council’s hearing on December 13, 2011, CL&P disagrees with NRG’s suggested changes to the energy facilities exempt modifications process.

Significantly, Section 16-50j-57 provides an expedited procedure for which certain modifications “may qualify”. There are limited circumstances when this procedure will potentially apply, such as installations of equipment that replaces damaged or inoperable equipment, equipment that is necessary for reliability purposes, and temporary equipment. These types of equipment installations are not particularly complex and would not adversely affect the operations of other energy companies. Appropriate notice provisions have been included for those that might actually be affected – landowners and municipal officials.

Mr. Morissette also commented that this type of process has already been tested and is working well with minor telecommunications and CATV modifications. In those cases, action by the Council’s designee helps expedite the process and reduce the burden on the Council. There is no requirement in the telecomm/CATV process for placing the matter on the Council’s agenda, and CL&P believes that requiring energy facility exempt modifications to be placed on the Council’s agenda would defeat the purpose of streamlining the process, one that is specifically designed for the installation of routine equipment that would not give rise to concerns by the public or other energy companies.

During the Council’s hearing, Attorney David Monz, on behalf of NRG, stated concerns about an energy facility exempt modification potentially affecting the manner of “serving subscribers in one network” and perhaps negatively impacting “capacity” and “load transmission”. These concerns relate to the overall operation of the system of providing power; they are more properly within the realm of issues in the expertise and jurisdiction of ISO – New England. In addition, installing equipment that increases the

ability of the transmission system to move power will effectively lower power costs to customers. Accordingly, since the Council's focus is on evaluating potential substantial adverse environmental effects arising from proposed projects, NRG's concerns appear to be misplaced.

Council members, Dr. Bell and Mr. Ashton, asked Attorney Monz for examples to support NRG's position. In support of its position, CL&P reviewed its records and would like to offer the following examples of past petitions filed with the Council that would be covered by the energy facilities exempt modification process:

A. Petition No. 894 (approved 5/07/09)

To comply with company design standards and the National Electrical Safety Code ("NESC"), CL&P proposed the following work:

- replacement of existing fences at five substations with seven-foot chain link fences and
- addition of a fence within the existing fence line at Preston Substation.

See, Exhibit A.

B. Petition No. 951 (approved 6/17/10)

To comply with the NESC, CL&P proposed:

- replacement of an approximately 170 foot section of a chain link fence at Southington Substation.

See, Exhibit B.

C. Petition No. 966 (approved 11/05/10)

To improve transmission reliability, CL&P proposed the following work within the fence line of Williams Substation:

- installation of two 115-kV circuit switchers to replace two motor-operated disconnect switches and associated work on foundations, structures and conduits,
- modification of the 115-kV bus connection and
- modification of protection schemes.

See, Exhibit C.

D. Petition No. 997 (approved 7/28/11)

To replace obsolete equipment, CL&P proposed the following work within the fence line of Southington Substation:

- installation of three new circuit switchers to replace three 345-kV puffer switches and
- replacement of a 345-kV circuit switcher.

See, Exhibit D.

These examples clearly demonstrate CL&P's position that the energy facilities exempt modification process, as drafted in the proposed regulations revisions, would streamline procedures and create efficiencies.

In conclusion, as stated by Mr. Morissette, CL&P believes that the exempt modification process for energy facilities will allow public, private and Council resources to be appropriately directed to more critical projects pending before the Council.

Respectfully Submitted,

THE CONNECTICUT LIGHT AND POWER
COMPANY

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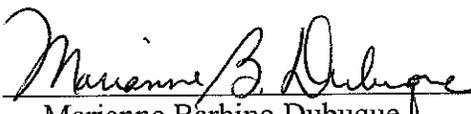

Marianne Barbino Dubuque

Exhibit A

Petition No. 894
Connecticut Light & Power
Brookfield, Greenwich, Mansfield, Preston, Redding, and Weston, Connecticut
Staff Report
May 6, 2009

On March 27, 2009, Northeast Utilities Service Company, acting as agent for Connecticut Light and Power Company (CL&P), filed a petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for proposed modifications to six existing CL&P substations.

At five of the six substations, CL&P seeks to replace existing fences with new, higher fences that would comply with NU's design standards and national electrical safety codes. The existing fences are five or six feet high with three strands of barbed wire on top. They would be replaced with seven-foot chain link fences with barbed wire on top that would bring the overall height of the replacement fences to eight feet. At the Preston substation—the sixth station—CL&P would add a new fence within the existing substation fence line. This new fence would limit the likelihood of unauthorized access to substation equipment.

Council member Brian Golembiewski and Council staff member David Martin conducted a field review of this project at the Mansfield substation on May 6, 2009. John Morissette, Steve Osuch, Christophe Kasamba, and Arianna Nyvana represented CL&P at the field review.

All work on the new fences would take place within the existing substations' footprints and would not require any expansion of the substations. Fences would be replaced within one working day so that no substation would have open access. CL&P expects to begin replacing the substation fences in May of this year and completing the work by December.

In Mansfield, there are some wetlands just to the west of the substation. The fence work, however, should not affect these wetlands. Erosion potential should also be minimized because the work will be occurring within areas that are well-graveled.

Exhibit B

Petition No. 951
Connecticut Light & Power Company
Southington, Connecticut
Staff Report
June 17, 2010

On May 27, 2010, the Connecticut Siting Council (Council) received a petition from The Connecticut Light & Power Company (CL&P) for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for proposed modifications to the Southington substation in Southington, Connecticut. Council member Ed Wilensky visited the site with staff member David Martin on June 10, 2010 to review the proposal. Bob Charpentier, Chris Kasamba, and John Morissette represented CL&P at the field review.

CL&P's proposed modifications consist of replacing a section, approximately 170 feet in length, of the chain link fence that encloses the substation. The section of fence to be replaced is approximately five feet high, which is lower than the 2007 National Electrical Safety Code's requirement for substation fences to be at least seven feet high. It would be replaced by a seven-foot high fence with one foot of barbed wire on top. The section of fence to be replaced runs parallel to Belleview Avenue and includes the front gate to the substation. This area of the substation is well-screened from Belleview Avenue by existing, mature vegetation.

The proposed fence replacement should not create any significant adverse environmental impacts.

Exhibit C

Petition No. 966
The Connecticut Light and Power Company
New London, CT
October 5, 2010
Staff Report

On September 16, 2010, the Connecticut Siting Council (Council) received a Petition from The Connecticut Light and Power Company (CL&P) for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for modifications to CL&P's Williams Substation in New London. On October 5, 2010, Council member James J. Murphy, Jr., Executive Director Linda Roberts, and Christina Walsh of the Council staff met with CL&P representatives John R. Morissette, James W. Borowitz, P.E., Helen M. Taylor, and Ezzeddine Zayati at the site.

All proposed work would be entirely within the fence line of the existing Williams Substation located at 469 Williams Street, New London, CT. The substation contains two 115-kV transmission circuits and ten 13.8-kV circuits.

The proposed project includes the installation of two 115-kV circuit switchers to replace two motor-operated disconnect switches, modification of foundations, structures and conduits for the new circuit switchers, modification of the 115-kV bus connection, and modification of the existing transmission and distribution protection schemes. The proposed project is needed to improve transmission reliability.

The new equipment would be similar in height and appearance to the existing equipment within the substation.

Construction is expected to begin during winter 2010 and be completed by the end of spring 2011.

Exhibit D

Petition No. 997
The Connecticut Light and Power Company
Southington, Connecticut
Staff Report
July 28, 2011

On June 20, 2011, the Connecticut Siting Council (Council) received a petition from The Connecticut Light and Power Company (CL&P) for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for proposed modifications to CL&P's Southington Substation located at 315 Belleview Avenue in Southington, Connecticut. Council member Larry Levesque and staff member Robert Mercier visited the site on July 25, 2011 to review the proposal. Helen Taylor, Glen Miemiee and Elizabeth Hale represented CL&P at the field review.

CL&P seeks to replace three 345-kV puffer switches with three new circuit switchers and an existing 345-kV circuit switcher with a new circuit switcher. The replacements are necessary to replace obsolete equipment.

The new equipment would be similar in size and appearance to the equipment being replaced and no visual impact would occur. All work would be within the existing, fenced substation. The substation is located on a large CL&P-owned parcel. Residential development occurs to the north but mature trees provide a buffer to the substation. There is no residential development adjacent to the east and south sides of the substation. Belleview Avenue is located to the west.

CL&P'S proposed modifications to the substation would not have a substantial adverse environmental effect.