



107 Selden Street  
Berlin, CT 06037

**Jeffery Cochran**  
Senior Counsel

860-665-3548  
jeffery.cochran@eversource.com

April 24, 2015

***VIA ELECTRONIC MAIL AND HAND DELIVERY***

Robert Stein, Chairman  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, Ct 06051

**Re: DOCKET NO. 192B – CPV Towantic, LLC Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need based on changed conditions pursuant to Connecticut General Statutes §4-181a(b) for the construction, maintenance and operation of a 785 MW dual-fuel combined cycle electric generating facility located north of Prokop Road and Towantic Hill Road intersection in the Town of Oxford, CT – Eversource Energy Comments on the April 10, 2015 Draft Findings of Facts**

Dear Chairman Stein:

On behalf of The Connecticut Light and Power Company doing business as Eversource Energy (“Eversource”), this letter provides Eversource’s comments on the April 10, 2015 Draft I Findings of Facts issued by the Connecticut Siting Council (“Council”) in the above-referenced docket.

***General Comment***

Based on discussion during the Council’s April 16, 2015 regular meeting regarding this docket and whether the interconnection facilities should be reviewed as part of this Docket or reviewed in a separate proceeding, Eversource comments that the Council’s Draft I Findings of Fact (“FoF”) pertaining to the facilities that would constitute the electrical interconnection between CPV Towantic, LLC’s (“CPV”) proposed generating facility and Eversource’s three existing transmission lines adjacent to the proposed site should be retained (FoF No. 84, 85 and 148-159). These FoF are supported by evidence in the record of this Docket and consistent with the Council’s Docket No. 192 June 23, 1999 Decision and Order, its June 23, 1999 Findings of Fact and its March 1, 2001 Development and Management Plan (“D&M Plan”) Decision and the associated Staff Report.

***Proposed Additions and Revisions to Draft I Findings of Fact***

Eversource proposes the following two additional findings for inclusion in the FoF concerning the Electrical Interconnection (FoF 148-159):

1. In Docket No. 192, the Council reviewed and approved the switchyard and interconnecting lines as part of the original facility (Docket No. 192 FoF 17, 23, 126, Decision and Order, 2.b). Details on the electric switchyard and interconnecting lines were included in the Docket No. 192 Development and Management Plan, which was approved by the Council in its March 1, 2001 Decision (Decision, page 2).
2. The components, layout and design of the switching station and interconnecting lines as presented in this Docket are substantially the same as the switchyard and interconnecting lines approved in Docket No. 192 (*see* CPV 1, EOSPCC, p.9 and Figure 2 and CPV 1, EOSPCC, p.4, Figure 1).

In addition, Eversource proposes the following revisions to FoF 152:

The first sentence of FoF 152 currently reads as follows:

As part of the interconnection process, ISO-NE completed technical studies that determined that no upgrades would be required for the #1990 line or for the #1575 line and their appurtenances as a result of CPV's proposed facility.

For clarification, Eversource proposes that the end of the sentence be revised as shown below to specify that no upgrades of these lines are required to accept the full output of CPV's proposed facility:

As part of the interconnection process, ISO-NE completed technical studies that determined that no upgrades would be required for the #1990 line or for the #1575 line and their appurtenances to accept the full output of CPV's proposed facility.

Eversource also proposes that the following sentence be inserted at the end of FoF 152:

In addition, Eversource explained that further line upgrades may be needed in the area as the result of the ISO-NE's on-going technical studies related to the ISO-NE Forward Capacity Market and CPV's proposed generating facility.

Respectfully submitted,

The Connecticut Light and Power Company doing business as Eversource Energy

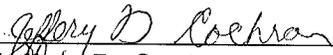
  
Jeffery D. Cochran

Its Attorney

cc: Service List

## CERTIFICATION

I certify that a copy of the attached document was sent on April 24, 2015, via U.S. First-Class mail or electronic mail, to each participant on the attached service list for this proceeding.

  
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Jeffery D. Cochran

**LIST OF PARTIES AND INTERVENORS  
SERVICE LIST**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Applicant</b>	CPV Towantic, L.L.C.	Franca L. DeRosa, Esq. Philip M. Small, Esq. Brown Rudnick LLP 185 Asylum Street Hartford, CT 06103 (860) 509-6500 (860) 509-6501 – fax <a href="mailto:fderosa@brownrudnick.com">fderosa@brownrudnick.com</a> <a href="mailto:psmall@brownrudnick.com">psmall@brownrudnick.com</a>
<b>Party</b>	Jay Halpern 58 Jackson Cove Road Oxford, CT 06478 h: 203-888-4976 <a href="mailto:zoarmonster@sbcglobal.net">zoarmonster@sbcglobal.net</a>  Peter Thomas 72 Towantic Hill Rd. Oxford, CT 06478 203-720-1536	
<b>Intervenor</b>	Town of Middlebury	Attorney Dana A. D'Angelo Law Offices of Dana D'Angelo, LLC 20 Woodside Avenue Middlebury, CT 06762 (203) 598-3336 (203) 598-7283 – fax <a href="mailto:Dangelo.middlebury@snet.net">Dangelo.middlebury@snet.net</a>  Stephen L. Savarese, Esq. 103 South Main Street Newtown, CT 06470 203-270-0077 <a href="mailto:attystephensavarese@gmail.com">attystephensavarese@gmail.com</a>
<b>Intervenor</b>	The Connecticut Light and Power Company (CL&P)	Stephen Gibelli, Esq. Associate General Counsel The Connecticut Light and Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5513 (860) 665-5504 –fax <a href="mailto:gibels@nu.com">gibels@nu.com</a>

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	CL&P continued...	<p>John R. Morissette                      Manager-Transmission Siting and Permitting                      The Connecticut Light and Power Company                      P.O. Box 270                      Hartford, CT 06141-0270                      (860) 665-2036  <a href="mailto:morisjr@nu.com">morisjr@nu.com</a></p> <p>Christopher R. Bernard                      Manager, Regulatory Policy (Transmission)                      The Connecticut Light and Power Company                      P.O. Box 270                      Hartford, CT 06141-0270                      (860) 665-5967                      (860) 665-3314 – fax  <a href="mailto:bernacr@nu.com">bernacr@nu.com</a></p> <p>Stella Pace, Senior Engineer                      The Connecticut Light and Power Company                      Transmission and Interconnection Dept.                      P.O. Box 270                      Hartford, CT 06141-0270                      (860) 665-3569  <a href="mailto:pacess@nu.com">pacess@nu.com</a></p> <p>Jeffery D. Cochran                      Northeast Utilities Service Company                      107 Selden Street                      Berlin, CT 06037                      860-665-3548  <a href="mailto:cochrjd@nu.com">cochrjd@nu.com</a></p>
Party	Town of Oxford	<p>Kevin W. Condon, Esq.                      Condon &amp; Savitt PC                      P.O. Box 570                      Ansonia, CT 06401                      203-734-2511  <a href="mailto:condonsavitt@comcast.net">condonsavitt@comcast.net</a></p>
Party	Naugatuck Valley Chapter Trout Unlimited	<p>Robert M. Perrella, Vice President                      TU Naugatuck/Pomperaug Valley Chapter                      278 W. Purchase Road                      Southbury, CT 06488-1004  <a href="mailto:johnnytroutseed@charter.net">johnnytroutseed@charter.net</a></p>

<p><b>Intervenor</b></p>	<p>Town of Southbury</p>	<p>Ed Edelson First Selectman Town of Southbury 501 Main Street Southbury, CT 06488 <a href="mailto:selectman@southbury-ct.gov">selectman@southbury-ct.gov</a> (203) 262-0647 (203) 264-9762 – fax</p>
<p><b>Party</b></p>	<p>The Pomperaug River Watershed Coalition</p>	<p>Len DeJong, Executive Director Pomperaug River Watershed Coalition 39 Sherman Hill Road, C103 Woodbury, CT 06798 203-263-0076 <a href="mailto:LDeJong@pomperaug.org">LDeJong@pomperaug.org</a></p>
<p><b>Intervenor (approved 06/07/06)</b></p>	<p>Raymond Pietrorazio 764 Charcoal Avenue Middlebury, CT 06762-1311 (203) 758-2413 (203) 758-9519 – fax <a href="mailto:ray@ctcombustion.com">ray@ctcombustion.com</a></p>	
<p><b>Intervenor (approved 10/10/06)</b></p>	<p>GE Energy Financial Services, Inc.</p>	<p>Jay F. Malcynsky The Law Offices of Jay F. Malcynsky, P.C. One Liberty Square New Britain, CT 06051 (860) 229-0301 (860) 225-4627 – fax <a href="mailto:jmalcynsky@gaffneybennett.com">jmalcynsky@gaffneybennett.com</a></p>
<p><b>Intervenor (Approved on November 13, 2014)</b></p>	<p>Borough of Naugatuck and Borough of Naugatuck Water Pollution Control Authority</p>	<p>Edward G. Fitzpatrick, Esq. Alicia K. Perillo, Esq. Fitzpatrick, Mariano, Santos, Sousa, PC 203 Church Street Naugatuck, CT 06770 203-729-4555 <a href="mailto:Fitz@fmslaw.org">Fitz@fmslaw.org</a> <a href="mailto:alicia@fmslaw.org">alicia@fmslaw.org</a></p> <p>Ronald Merancy, Chairman Water Pollution Control Authority 229 Church Street Naugatuck, CT 06770 203-720-7000 <a href="mailto:Rjm62156@aol.com">Rjm62156@aol.com</a></p>

<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Wayne McCormack 593 Putting Green Lane Oxford, CT 06478 <a href="mailto:wayne@waynemccormack.com">wayne@waynemccormack.com</a>	
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Naugatuck River Revival Group, Inc.	Kevin R. Zak, President Naugatuck River Revival Group, Inc. 132 Radnor Avenue Naugatuck, CT 06770 <a href="mailto:kznrrg@sbcglobal.net">kznrrg@sbcglobal.net</a> 203-530-7850
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Westover Hills Subdivision Homeowners	Chester Cornacchia Westover Hills Subdivision Homeowners 53 Graham Ridge Road Naugatuck, CT 06770 203-206-9927 <a href="mailto:cc@necsonline.com">cc@necsonline.com</a>
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Westover School	Kate J. Truini Alice Hallaran Westover School 1237 Whittemore Road Middlebury, CT 06762 203-758-2423 <a href="mailto:ktruini@westoverschool.org">ktruini@westoverschool.org</a> <a href="mailto:ahallaran@westoverschool.org">ahallaran@westoverschool.org</a>
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Greenfields, LLC and Marian Larkin	Edward S. Hill, Esq. Cappalli & Hill, LLC 325 Highland Avenue Cheshire, CT 06410 203-272-2607 <a href="mailto:ehill@cappalihill.com">ehill@cappalihill.com</a>
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Lake Quassapaug Association, LLC	Ingrid Manning, Vice President Lake Quassapaug Association, LLC P.O. Box 285 Middlebury, CT 06762 203-758-1692 <a href="mailto:Ingridmanning2@gmail.com">Ingridmanning2@gmail.com</a>

<b>Intervenor</b> <b>(Approved on</b> <b>January 8, 2015)</b>	Middlebury Land Trust, Inc.	W. Scott Peterson, M.D., President Middlebury Land Trust, Inc. 317 Tranquility Road Middlebury, CT 06762 203-574-2020 <a href="mailto:wsp@aya.yale.edu">wsp@aya.yale.edu</a>
<b>Intervenor</b> <b>(Approved on</b> <b>January 15, 2015)</b>	Quassy Amusement Park	George Frantzis Quassy Amusement Park P.O. Box 1107 Middlebury, CT 06762 203-758-2913 ext 108 <a href="mailto:george@quassy.com">george@quassy.com</a>
<b>Intervenor</b> <b>(Approved on</b> <b>January 15, 2015)</b>	Middlebury Bridle Land Association	Nancy Vaughan Middlebury Bridle Land Association 61 Sandy Hill Road Middlebury, CT 06762 203-598-0697 <a href="mailto:ndzjavaughan@gmail.com">ndzjavaughan@gmail.com</a>
<b>Intervenor</b> <b>(Approved on</b> <b>January 15, 2015)</b>	Dennis Kocyla 28 Benz Street Ansonia, CT 06401 203-736-7182 <a href="mailto:Dennis3141@yahoo.com">Dennis3141@yahoo.com</a>	
<b>Intervenor</b> <b>(Approved on</b> <b>January 15, 2015)</b>	Naugatuck Valley Audubon Society	Sophie Zyla Jeff Ruhloff Carl Almonte Naugatuck Valley Audubon Society 17 Stoddard Place Beacon Falls, CT 06403 203-888-7945 <a href="mailto:NVASeditor@mail.com">NVASeditor@mail.com</a>
<b>Intervenor</b> <b>(Approved on</b> <b>January 15, 2015)</b>	Oxford Flying Club	Burton L. Stevens Oxford Flying Club, Inc. P.O. Box 371 Woodbury, CT 06798 203-236-5158 <a href="mailto:bstevens@snet.net">bstevens@snet.net</a>