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April 27, 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 Brief

Dear Chairman Stein:

On behalf of The Connecticut Light and Power Company doing business as Eversource Energy (“Eversource”), enclosed are an original and fifteen copies of Eversource’s Brief in this Docket.

Respectfully submitted,

The Connecticut Light and Power Company doing business as Eversource Energy


Jeffery D. Cochran
Its Attorney

Enclosure
cc: Service List

CONNECTICUT SITING COUNCIL

DOCKET NO. 192B CPV Towantic,	:	DOCKET 192B
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	:	April 27, 2015

**BRIEF OF
THE CONNECTICUT LIGHT AND POWER COMPANY
DOING BUSINESS AS EVERSOURCE ENERGY**

I. INTRODUCTION

Mr. William O’Hara, witness for The Connecticut Light and Power Company doing business as Eversource Energy (“Eversource”), has described and explained the interconnection facilities that CPV Towantic, LLC’s (“CPV”) has proposed for connecting its proposed electric generating facility in Oxford to three of Eversource’s existing 115-kV transmission lines (i.e., the 1575 Line, 1585 Line and 1990 Line), if the Connecticut Siting Council grants CPV’s requested amended certificate. CPV 1 EOSPCC, p.9-10, Figure 2, Eversource 2, p. 2-3; Eversource 3, response to RP-001; Tr. 6, p. 41-42, 45. These interconnection facilities would be needed solely for CPV’s generating facility; consequently, these facilities should be reviewed and considered as part of this reopened Docket.

As designed, the interconnection facilities that Eversource would construct, own and operate for CPV's generating facilities would comprise the proposed switching station (or switchyard), arranged in a "breaker and a half" configuration (the "Switching Station"), the line loop facilities, including six steel monopole transmission line support structures to loop Eversource's three existing 115-kV lines into the Switching Station and the associated overhead conductor and appurtenances for these line loop facilities. Eversource 2, p. 2-3; CPV 1, EOSPCC, p. 9-10, Figure 2. Eversource expects that the six transmission line support structures would be between approximately 80 and 110 feet tall. Eversource 2, p. 3,

II. CPV'S EXISTING CERTIFICATE INCLUDES COUNCIL APPROVAL OF THE INTERCONNECTION FACILITIES FOR THE PREVIOUSLY APPROVED GENERATING FACILITY

In Docket No. 192, the Council reviewed and approved the switchyard and interconnecting lines as part of the original facility (Docket No. 192 Findings of 17, 23, 126, Decision and Order, Condition 2.b). Details of 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, p. 2). The staff report indicated that Towantic Energy LLC would construct the proposed switchyard and upon completion of the construction and connection to the transmission system, ownership of the switchyard would be transferred to Northeast Utilities. Docket 192 Development and Management Plan, Staff Report, p. 3. In this reopened Docket, Eversource is seeking authorization to construct, own and operate the switchyard and line loop facilities.

The components, layout and design of the switching station and line loop facilities as presented in this Docket 192B are substantially the same as the switchyard and interconnecting lines

approved in Docket No. 192 (*see* CPV 1, EOSPCC, p. 9-10, Figure 2 and CPV 1, EOSPCC, p. 3-4, Figure 1). Thus, CPV's Certificate of Environmental Compatibility and Public Need ("Certificate") for the previously approved generating facility includes authorization for substantially the same interconnection facilities as the interconnecting facilities proposed in this Docket.

III. IF THE COUNCIL APPROVES CPV'S REQUESTED AMENDED CERTIFICATE, THE AMENDED CERTIFICATE SHOULD AUTHORIZE EVERSOURCE TO CONSTRUCT, OWN AND OPERATE THE INTERCONNECTION FACILITIES FOR CPV'S GENERATING FACILITY

Recent Council decisions concerning electric generating facilities have included authorization for construction, operation and ownership of the associated interconnection facilities needed for such generating facilities. For example, in the Council's Decision and Order in Petition No. 831, the Council ruled that Waterbury Generation LLC's proposed 96 MW combustion turbine peaking facility and the associated transmission line tap to connect the generating facility to the Baldwin Street Substation in Waterbury would not have a substantial adverse environmental effect and therefore it would not require a Certificate. Petition No. 831, April 10, 2008 Decision and Order; April 10, 2008 Findings of Fact, p. 5-6.

In Petition No. 875, the Council ruled that GenConn Energy LLC's proposed installation and operation of four 50 MW peaking units at Middletown Station would not have a substantial adverse environmental effect and therefore would not require a Certificate. Petition No. 875, December 5, 2008 Letter Ruling. GenConn Energy's proposed project included construction of a new 345-kV switchyard in proximity to an existing 345-kV terminal structure. Petition No. 875, December 4, 2008 Staff Report, p.2.

Similarly, in the recent Council's decisions concerning two proposed new substations in Norwalk, the Council granted Certificates for those new substations to be constructed, owned and operated (in whole or in part) by two municipal electric departments and for the associated interconnection facilities to be constructed, owned and operated by The Connecticut Light and Power Company ("the Company") between its 115-kV transmission line and the substations. *See* Docket No. 426, Third Taxing District Electric Department application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of an electrical substation located at 6 Fitch Street, Norwalk, Connecticut, August 9, 2012 Decision and Order, Condition 1. d), August 9, 2012 Findings of Fact (Findings 37, 43, 44); Docket No. 431, South Norwalk Electric and Water application for the construction, maintenance, and operation of an electrical substation and its connection to an existing 115-kV transmission line, located at 180 Dr. Martin Luther King, Jr, Drive, Norwalk, Connecticut, March 21, 2013 Decision and Order, Condition 1.d), March 21, 2013 Findings of Fact, findings 50 – 54 (in Docket No. 431, South Norwalk Electric and Water and the Company proposed that the Company would own, operate and maintain the transmission related equipment in the substation as well as the interconnection facilities between the new substation and the Company's existing 115-kV line). September 11, 2013 Approval of Development and Management Plan, Part III and September 5, 2013 Staff Report, p. 1-2.

If the Council approves CPV's amended Certificate, including approval in the amended certificate for Eversource to construct, own and operate the switching station and line loop facilities for CPV's generating facilities, the Council's approval would be consistent with the prior decisions of the Council as explained above. *See* Docket 192 B, Draft I Findings of Fact

158, Tr. 6, p. 40-41, 48, Eversource 2, p. 2-3. Further, including such authorization would enhance administrative efficiency by addressing associated transmission facilities that are needed solely as the result of the approval of CPV's proposed generating facility in the same approval.

IV. FINAL ENGINEERING INFORMATION AND ANY OTHER REQUESTED INFORMATION REGARDING THE INTERCONNECTION FACILITIES CAN BE SUBMITTED IN CONJUNCTION WITH CPV'S D&M SUBMITTALS

At the March 12, Hearing in this Docket, Eversource's Mr. O'Hara was asked whether the six line loop support structures planned to be located in Eversource's right of way that borders the site for CPV's proposed generating facility had been designed. Mr. O'Hara explained that the planned locations for these six "turning structures" will be as shown in the diagrams that CPV provided to the Council, but he also acknowledged that these structures have not yet been completely engineered. Tr. 6, p. 48-49. Final detailed engineering information concerning the switching station and the line loop facilities (e.g., heights of individual line loop support structures) can be submitted in conjunction with CPV's Development and Management Plan submittals. That approach would be consistent with the process used in Docket No. 192 concerning the interconnection facilities. *See* Docket 192 June 23, 1999 Decision and Order, Condition 2. b), March 1, 2001 Development and Management Plan Decision, p. 2.

V. INFORMATION CONCERNING UPGRADES TO EVERSOURCE'S LINE FACILITIES NEEDED FOR OPERATION OF CPV'S GENERATING FACILITY OR FOR ISO-NE'S FORWARD CAPACITY MARKET WILL BE SUBMITTED FOR REVIEW BY THE COUNCIL ONCE THE SCOPE OF SUCH LINE UPGRADE WORK HAS BEEN DETERMINED

As explained in Eversource's interrogatory response, ISO-NE technical studies determined that the Line 1585 between the CPV facility and Bunker Hill Substation would need to be upgraded to increase capacity in order to handle the output of the plant. Eversource 3, Response to RP-001; Tr. 6, p. 42. Mr. O'Hara explained that the engineering evaluation work needed for the upgrade of the

1585 Line is underway to determine how the upgrade will be completed; once the engineering analysis is completed, Eversource will seek Council approval for that line upgrade. In addition, Mr. O'Hara noted that further line upgrades may be needed in the area as the result of the ISO-NE's ongoing technical studies related to the ISO-NE Forward Capacity Market and CPV's proposed generating facility. Tr. 6, p. 34. Once the scope of work needed for any such upgrades is determined, Eversource would seek appropriate Council approval for the upgrade work through separate filings.

VI. CONCLUSION

For the reasons explained above, if the Council approves CPV's proposed modifications to its Certificate, Eversource respectfully requests that the amended Certificate include authorization for Eversource to construct, own and operate the switching station and line loop facilities for CPV's generating facility. Eversource will submit any additional information concerning these interconnection facilities that is requested by the Council, such as final engineering information, in conjunction with CPV's Development and Management Plan submittals.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY
DOING BUSINESS AS EVERSOURCE ENERGY

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CERTIFICATION

I certify that a copy of the attached document was sent on April 27, 2015, via U.S. First-Class mail or electronic mail, to each participant on the attached service list for this proceeding.



Jeffery D. Cochran

**LIST OF PARTIES AND INTERVENORS
SERVICE LIST**

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