

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

Implementation of Section 8 and Section 54 of : DOCKET NO. 346
Public Act No. 07-242 An Act Concerning :
Electricity and Energy Efficiency : JUNE 19, 2009

THE CONNECTICUT LIGHT AND POWER COMPANY'S
PRE-FILED TESTIMONY

Q. Would you please introduce yourself and the rest of the panel?

A. My name is Douglas McCracken, Director of Transmission Operations and Reliability Compliance for Northeast Utilities ("NU"). I am responsible for leading the Connecticut Valley Electric Exchange, also known as CONVEX, and provide coordination with the New Hampshire Electric System Control Center. In addition, I oversee normal operations and emergency restoration of transmission facilities; direct the development, design and installation and maintenance of energy management systems; and represent NU at North American Electric Reliability Corporation ("NERC"), Northeast Power Coordinating Council ("NPCC"), and ISO New England ("ISO-NE") meetings associated with the operation of the interconnected bulk power system. With me is Bradley P. Bentley, Director Transmission Systems Planning for Northeast Utilities. As Director, Mr. Bentley is responsible for directing the Transmission System Planning Group. Also with me is William E. McEvoy, Manager of Information Technology Business Services for the Northeast Utilities System. Mr. McEvoy is

the Northeast Utilities Cyber Security Program Manager. Our résumés are attached to this testimony as Exhibit A.

Q What is the purpose of your testimony?

A. Our testimony provides comments on the Council's White Paper that was issued on June 1, 2009 regarding its investigation of energy security in response to Section 8 of Public Act 07-242. The Council's White Paper states:

“Security in this document will only relate to intentional physical threats to a facility. Threats can range from simple trespassing to vandalism to dedicated acts of sabotage. Siting security in this document does not relate to operational, reliability, and maintenance procedures asset connection requirements, or naturally-caused calamities (i.e. hurricanes or ice storms).”

The Connecticut Light and Power Company's ("CL&P") testimony is therefore focused on addressing issues raised in the White Paper relevant to intentional physical threats to energy facilities and not the universe of energy security issues that are being addressed in various state, regional and federal forums.

Q What is CL&P's overall assessment of the White Paper?

A. CL&P commends the Council for focusing on physical threats to energy facilities that it regulates because this element of energy security falls within the siting expertise of the Council. The Council's review of physical threats benefits applicants by assuring that those who apply for certificates from the Council will have their applications reviewed in the context of intentional physical threats rather than the full array of security issues that energy security in its broader sense entails. As the Council noted in its conclusion:

The Council understands the complexity of a dynamic system such as the electric grid and accepts and concurs with the layers of oversight that protect it by competent and responsive entities.

Operational, reliability, maintenance procedures, asset connection requirements or naturally caused calamities are concerns that are more than adequately and continually being addressed by the assortment of national and regional oversight described in detail in the White Paper.

Additionally, CL&P appreciates the notice of potential areas of inquiry that the White Paper provides each applicant. Knowing the scope of energy security topics that the Council may consider when reviewing an application is a valuable assistance to all applicants. Every application to the Council consists of so many unique characteristics that it is helpful to know what topics may form the core of inquiry from the staff. The uniqueness of each energy project does not allow for the promulgation of a rigid set of guidelines. Applicants benefit when they have a set of principles, such as those found on page 4 of the White Paper, to alert them to Council's security concerns relating to potential physical threats

Q. Could you please explain the extent of federal and regional security regulation that CL&P already must comply with?

A. The Council's White Paper provides a nice overview of national and regional regulatory scheme that subjects CL&P to a wide variety of constantly evolving regulation. The purpose of all this oversight is to enhance reliability through providing a secure regionally integrated power system of generation and transmission system. Electricity is provided to Connecticut through connected

generation and transmission facilities which, since deregulation of Connecticut's electric industry, are operated by different entities. Connecticut is also connected with facilities that serve all of New England and is interconnected to New York. Central to the operation of this complicated power system is the goal of uninterrupted service, or reliability, and the maintenance of a market based electric service to all of the region's customers.

As the Council recognizes in its White Paper and from the General Scope and Range of Review document issued and approved by the Council on January 22, 2009, CL&P as a transmission owner and operator in the integrated system is compelled by the rules of several regional and federal standard setting bodies, as noted in the White Paper, to maintaining the most reliable system possible. CL&P's transmission system must be secure from interruption to provide reliable service. Since transmission does not operate without generation, the coordination of security measures is a regional and national task.

Prior to an application being filed with the Council, CL&P security issues are incorporated in the planning and design. Under the Public Utilities Environmental Standards Act, CL&P has to justify the value of a project to the overall reliability of the grid. The design must, without unnecessarily impacting the environment, recognize the site's vulnerability to interruption of service and design to minimize any potential threat to the facilities reliability.

Q. Why is energy security more than just a Connecticut siting issue?

A. The transmission grid and generation are regionally integrated systems that are federally regulated. Energy security has been the focus of the federal oversight agencies for some time. The rules of those oversight organizations and agencies have been provided to the Council and referenced in the White Paper. The large scale blackout in August of 2003 highlighted the vulnerability of the Bulk Electric System ("BES"). The Federal Energy Regulatory Commission ("FERC"), for example, has reorganized to re-focus its oversight of bulk electric system's reliability. NERC is mandated by FERC to undertake a variety of industry supported initiatives, including best practices and standards development to address reliability and security of the BES. NERC reliability standards also require transmission owners, such as CL&P, to prepare and maintain security related to intentional physical threats.

Q. Do you have any concerns with the draft White Paper recommendations that were issued on June 1, 2009?

A. Yes. The Council should restrict itself to general security considerations as they relate to siting proceedings, and not be persuaded to set general industry-wide policies for either existing or planned facilities that could directly contradict security requirements which are the responsibility of other agencies.

Q. Do you have any concerns with specific aspects of the draft White Paper recommendations that were issued on June 1, 2009?

A. Yes. In regards to Topics enumerated on pages 4 and 5, CL&P would like to offer the following comments:

- Regarding Topic listed as A. 1.: The Council's White Paper would mandate the disclosure of security vulnerabilities that could jeopardize electric security. The White Paper would require CL&P and others to identify the types of security threats to a facility and identify specific vulnerabilities. The sensitive nature of any investigation into the electric security issues, both national and regional, necessarily walks a fine line in how much disclosure of a proposed facility's vulnerability needs to be in the public domain. CL&P is concerned that compliance with this guideline would have the unintended consequence of making a proposed project more vulnerable with this information available to the public. Critical cyber asset information is required to be protected by NERC standards. Other critical energy infrastructure information would be classified as Critical Energy Infrastructure Information ("CEII") requiring executive sessions limited to those individuals who have signed non-disclosure agreements.
- Regarding Topic listed as Topic A. 4. where it reads "(E)xamine how vulnerability information is disseminated to employees as well as the public.", the White Paper would have the Council examine how vulnerability information is disseminated to employees as well as the public. This does not seem to relate to siting as much as it does to the

overarching concerns that the national standards address on an operational basis. While communication of vulnerability is of utmost concern it does not appear to relate to the location or design of the facility or physical security.

- Regarding Topic listed as Topic A. 4. where it reads “(D)iscussion with other industry members or appropriate government agencies to share information regarding threats and countermeasure.”, the White Paper would have the Council examine an applicant engaging in discussions with other industry members or appropriate government agencies to share information regarding threats and countermeasure. Again this is a valid security concern to the continued operation of the transmission system, but it is difficult to see how this relates to evaluating the location and design or physical security of a proposed facility. This is a concern that CL&P currently addresses by compliance with NERC rules.

- Regarding Topic listed as Topic D. 4., Subsection No. 2, the White Paper states under “Reporting”:

"Final reporting to determine shortcomings in the security plan and identification of methods of resolution.
Analysis of notification and response actions followed by recommendations to improve response efficiency."

This Topic appears to be a post incident analytical tool for an operational facility where an incident may have occurred. It is not something that could be inquired into during an application for a facility that has not yet been put into operation.

It is unclear from the White Paper how the Council might apply this Topic. The Council may wish to re-visit this Topic as it relates to the application process. Presently, CL&P is required to participate in this type of process. Real-time notification and response actions are addressed by NERC CIP standards CIP-001 and CIP-008. Therefore further analysis by the Council should not be required. The final White Paper may consider removing this Topic from its list of potential Topics or clarify how the Council would implement this analytical tool in an application process.

Q. Does this conclude your testimony?

A. Yes

EXHIBIT A

Resumes of:

Douglas McCracken

Bradley P. Bentley

William E. McEvoy

DOUGLAS MCCRACKEN

Douglas McCracken is the Director of Transmission Operations & Reliability Compliance for Northeast Utilities.

Mr. McCracken holds a masters degree in Business Administration from Rensselaer Polytechnic Institute and a Bachelor of Science degree in Mechanical Engineering from the University of Massachusetts Lowell. He is also a registered professional engineer in the State of Connecticut.

Prior to joining Transmission, Doug had more than 25 years of experience in the electric power industry, including Design Engineering, Startup Testing and Operations with Detroit Edison, multiple years in Operations at Connecticut Yankee where he was licensed as a Senior Reactor Operator, and various managerial positions at Millstone Power Station including Corrective Action Manager, Manager of Financial and Business Services, and Assistant Station Director. He also served as the Emergency Plan Director of Station Emergency Operations.

Doug is responsible for leading the Connecticut Valley Electric Exchange (CONVEX) and coordinating the New Hampshire Electric System Control Center (ESCC) in the real-time operation of NU's transmission facilities, consistent with the policies, procedures, and standards of the North American Electric Reliability Council (NERC), the Northeast Power Coordinating Council (NPCC), and ISO-New England (ISO-NE). He oversees normal operations and emergency restoration of transmission facilities; directs the development, design and installation and maintenance of energy management systems; and represents NU at NERC, NPCC, and ISO-NE meetings associated with the operation of the interconnected bulk power system. He also has responsibility for facilitating reliability compliance for all (17) NU registered functional entities.

BRADLEY P. BENTLEY, P.E.

Bradley Bentley is the Director Transmission System Planning for Northeast Utilities (NU).

Mr. Bentley holds a Master of Science in Electrical Engineering from The Ohio State University and a Bachelor of Science degree in Electrical Engineering from Clarkson University. He has been a registered professional engineer in the State of Ohio since 1997. Mr. Bentley is currently attending the University of Connecticut, School of Business in pursuit of his Masters of Business Administration.

At Northeast Utilities, Brad is responsible for directing the work activities of the Transmission System Planning department including the development and approval of transmission projects throughout the NU system. His responsibilities also include the completion of planning studies that meet Federal Energy Regulatory Commission (FERC), North American Electric Reliability Council (NERC), Northeast Power Coordinating Council (NPCC) and ISO-New England (ISO-NE) transmission planning criteria

Mr. Bentley joined Northeast Utilities in February 2008. Prior to Northeast Utilities, Brad had worked the past 18 years with various utilities in the electric power industry throughout the U.S. with a primary focus on Transmission Planning. His previous experience included Transmission Planning Manager for San Diego Gas & Electric (SDG&E) where he was responsible for completion of SDG&E's Annual Grid Assessment. He managed the approval process for complex planning projects that included technical, financial, and external approval from the California ISO. As a Transmission Planning Engineer for GridAmerica LLC, (an Independent Transmission Company founded by National Grid) and American Electric Power (AEP), Brad was responsible for planning transmission and substation projects in Ohio and Indiana. While at AEP, Brad also held various positions in Nuclear Engineering, Operations, and Energy Marketing and Trading.

William E. McEvoy

William E. McEvoy is the Manager of Information Technology Business Services for the Northeast Utilities System. He is responsible for working directly with the Transmission and Corporate Center line of business clients to identify, prioritize, and align IT services and investments with company strategies and objectives. McEvoy is the Northeast Utilities Cyber Security Program Manager.

A native of Waterbury, CT, McEvoy holds a Bachelor of Science degree in Computer Information Systems and a Master of Business Administration degree with a concentration in Management Information Systems, both from the University of New Haven.

McEvoy started his professional career at NU in 1982 as a meter reader, moving to IT as a third-shift computer operator. Over his career at NU, McEvoy has held various IT positions including product manager, technology manager, and account manager. In 1984, McEvoy joined CONVEX as a computer scientist, and moved into the roles of Coordinator of Staff Services, Project Manager for the design and building of the control center, currently in the 3333 building. His last position held at CONVEX was the Manager of Operations & Engineering. Returning to the IT organization in 1998, McEvoy was appointed as the Energy Delivery IT Account Manager. In 2002, he was appointed the Transmission IT Technology Manager. He assumed his current position in July 2006. At that time, McEvoy was appointed Northeast Utilities Cyber Security Program Director. He is responsible for the implementation of Northeast Utilities compliance program to meet the Critical Infrastructure Protection Standards.

McEvoy represents Northeast Utilities on the EEI Cyber Security Working Group. He is the Chairman of the NPCC Task Force on Infrastructure and Technology (TFIST), and represents the NPCC on the NERC Critical Infrastructure and Protection Committee (CIPC).

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