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S. Derek Phelps Executive Director Connecticut Siting Council Ten Franklin Square New Britain, CT 06051	Stephen H. August, Esq. Presiding Officer Massachusetts Energy Facilities Siting Board One South Station, 2 nd Floor Boston, MA 02110
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**Connecticut OCC's Intervention
in Massachusetts Proceeding**

Re: <u>Connecticut Siting Council</u> CL&P Application for the Greater Springfield Reliability Project & NRG Energy, Inc. Application For Consideration Of A Generating Plant In Meriden, Connecticut <u>Docket Nos.</u> 370A & 370B (Consolidated)	Re: <u>Massachusetts Energy Facilities Siting Board</u> Western Massachusetts Electric Company Application for the Greater Springfield Reliability Project <u>Docket Nos.</u> EFSB 08-2 & D.P.U. 08-105, & D.P.U. 08-106
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Dear Messrs. Phelps and August:

The Connecticut Office of Consumer Counsel ("Connecticut OCC") is a party to the Connecticut siting proceeding captioned at the left above. The Connecticut OCC has today petitioned to intervene in the Massachusetts siting proceeding captioned at the right above.

In the Connecticut proceeding cited above, The Connecticut Light and Power Company ("CL&P") has applied to the Connecticut Siting Council ("CSC") for approval of a project known as the Greater Springfield Reliability Project ("GSRP"). In the Massachusetts proceeding cited above, the Western Massachusetts Electric Company ("WMECO"), a CL&P sister company, has applied to the Massachusetts Energy Facilities Siting Board ("Massachusetts EFSB") for approval of GSRP.

The original of Connecticut OCC's petition to intervene is being sent to the Massachusetts EFSB. Copies of that petition, and of this letter, are being sent to the service lists for both of these administrative dockets.

To participants in the Connecticut Docket:

You already are aware of the following points:

- (a) Connecticut OCC is the statutory advocate for Connecticut's utility ratepayers.
- (b) In the Connecticut docket, Connecticut OCC filed expert testimony as follows: Direct Testimony of Paul Chernick, July 7, 2009 ("Chernick Testimony").
- (c) In the Connecticut docket, Connecticut OCC has filed discovery answers as follows: CL&P-1 through CL&P-7, inclusive, July 9, 2009 ("OCC Discovery Answers").

Further, the Chernick Testimony, sponsored by Connecticut OCC, contends as follows:

- (i) CL&P has not shown any need for GSRP, either at present or within any future time period used by system planners such as ISO-New England; and
- (ii) CL&P's analyses leave unanswered the question of whether local reliability issues in the Springfield area remain, and/or how to resolve any such issues.

To participants in the Massachusetts Docket:

Some of you already have seen and studied the Chernick Testimony.

Specifically, the Massachusetts EFSB has made explicit reference to the Chernick Testimony in numerous interrogatories propounded to WMECO, and WMECO has answered those interrogatories.¹ This necessarily means that WMECO, the utility applicant in the Massachusetts EFSB proceeding, is specifically familiar with the Chernick Testimony.

¹ In Massachusetts EFSB 08-2, [see the Fourth Set of EFSB Staff Information Requests](#), propounded 7/31/09 and answered in mid-August, particularly questions EFSB-N-123 through EFSB-N-135, and EFSB-N-162 through EFSB-N-164.

Also:

(a) ISO-New England, Inc. (“ISO-NE”), an intervenor in the Massachusetts docket, is an intervenor in the Connecticut docket.

(b) Massachusetts Municipal Wholesale Electric Company (“MMWEC”), a party in the Massachusetts docket, is an intervenor in the Connecticut docket.

This suggests that both ISO-NE and MMWEC already are familiar with the Chernick Testimony.

Any participant in the Massachusetts docket wishing to obtain a copy of the Chernick Testimony or the OCC Discovery Answers, or both, should contact the undersigned. Copies of these materials will be forwarded promptly.

Very truly yours,

MARY J. HEALEY
CONSUMER COUNSEL

By: _____
Bruce C. Johnson
Principal Attorney

cc: Service List (both dockets)