

**STATE OF CONNECTICUT  
SITING COUNCIL**

APPLICATION TO THE CONNECTICUT : DOCKET NO. 370A  
LIGHT AND POWER COMPANY FOR :  
CERTIFICATES OF ENVIRONMENTAL :  
COMPATIBILITY AND PUBLIC NEED :  
FOR THE CONNECTICUT PORTION :  
OF THE GREATER SPRINGFIELD :  
RELIABILITY PROJECT AND FOR THE :  
MANCHESTER TO MEEKVILLE :  
JUNCTION CIRCUIT SEPARATION :  
PROJECT :

APPLICATION OF NRG ENERGY, INC. : DOCKET NO. 370B  
PURSUANT TO CONN. GEN. STAT. §16- :  
50l(a)(3) FOR CONSIDERATION OF A :  
530 MW COMBINED CYCLE GENERATING :  
PLANT IN MERIDEN, CONNECTICUT : January 15, 2010

**COMMENTS OF THE CONNECTICUT DEPARTMENT OF TRANSPORTATION**

The Connecticut Department of Transportation (CDOT) hereby submits its comments regarding the above captioned matter. Conn. Gen. Stat. § 16-50j requires the Siting Council to consult with various state agencies including the CDOT. In this docket the Siting Council must determine both the need for the proposed project and if need exists, the preferred route after considering all the appropriate factors. Since most of the proposed project is located in Massachusetts, CDOT believes that the Siting Council could defer its decision until Massachusetts determines its need for the project.

Furthermore CDOT does not have the expertise to comment on the need for the project and leaves that determination to the Siting Council as required by statute. Nor can CDOT comment of the merits of the NRG proposal. In addition CDOT will not provide any comment on the preferred route identified by the applicant as it does not involve state roads.

CDOT's only interest in this matter involves one of the potential underground route variations involving state routes 168/187 and therefore will limit its comments to that potential alternate route.

**I. INTRODUCTION :**

Pursuant to Conn. Gen. Stat. §16-50l(A) Connecticut Light & Power Company (CL&P) filed an application for a Certificate of Environmental Compatibility and Public Need for the Greater Springfield Reliability Project (GSRP). The GSRP project proposes to build new 345kv overhead lines for a total of approximately 35 miles in both Connecticut and Massachusetts. Most of the construction is in Massachusetts with the Connecticut portion consisting of approximately 12 miles. Western Massachusetts Electric Company is seeking approval from the Massachusetts Energy Facilities Siting Board for the Massachusetts portion of the GSRP. Upgrading existing 115kv lines and other improvements are also part of GSRP. CL&P's preferred route in Connecticut is an all overhead route utilizing the existing right-of-way. As part of its application CL&P also listed four potential route variations. Finally, CL&P is seeking contingent approval of the Massachusetts Southern Route Alternative which would include an additional 5.4 miles in Connecticut.

**1. State Route 168/187 Underground Line Route Variation:**

Conn. Gen. Stat. § 16-50p(i) provides that there is a presumption against placing any 345kv facility adjacent to a residential area. The presumption can be overcome if the applicant can show that undergrounding would be "technologically infeasible". An unreasonable economic burden is a factor in determining whether a proposal is technologically feasible. Since some of the proposed overhead route is potentially adjacent to a "residential area" as set forth in Conn. Gen. Stat. Sec. 16-50p(i), CL&P identified four potential underground route variations.

One of those involves state roads and is identified as the State Route 168/187 Underground Line Route Variation (“State road variation”). Carberry/Newland PFT, pgs. 44-45. The State road variation would be approximately 8 miles and would replace 5 miles of the preferred overhead route. Carberry/Newland PFT, pg. 47. CL&P is not recommending any of the underground variations primarily on the basis of the high cost of undergrounding coupled with the likely localization of that cost to Connecticut taxpayers. Carberry/Newland PFT, pg. 49. The State road variation is estimated to cost approximately \$337 million while its overhead counterpart would cost only \$15 million. Carberry/Newland PFT, pg. 48. If the cost is localized as CL&P suggests, Connecticut taxpayers will have to pay \$326 million for the state road variation compared to approximately \$4 million for the overhead route. Carberry/Newland PFT, pg. 49. While all of the underground variations are more costly than their overhead counterparts, the State road variation is the most costly of all the variations, more than double the least cost route variation. Id.

In addition to the estimated costs outlined by CL&P, there are other costs related to using state roads. CDOT has an infrastructure improvement program in which state roads undergo design changes and/or improvements. CDOT PFT, pg. 2. As a result the underground transmission lines could need readjustment or relocation. Id. Like the original installation, the relocation or readjustment of the lines would also be costly. Id. Regardless of the entity that bears that initial cost, ultimately those costs will filter to the citizens of Connecticut. In addition, those costs do not account for the additional design work that would be required by CDOT in order to accommodate the underground transmission lines. CDOT PFT, pg. 2.

Underground transmission lines require splice vaults at certain locations. CDOT requires that every attempt possible is made to locate the splice vaults as far from the traveled portion of

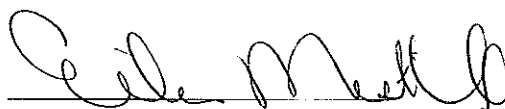
the road as possible. CDOT PFT, pg. 3. As a result, CL&P may have to acquire additional rights of way on private property. Id. Maintenance of underground lines and splice vaults will result in greater traffic delays and congestion for those roads. Id. Finally, CL&P also testified that underground lines have greater operational issues. Carberry/Newland PFT, pgs. 49-50.

If, after considering all of the factors outlined in the statute the Siting Council chooses the State road variation, the Siting Council should require that the applicant to work with CDOT regarding the installation of the lines in the state roads as has been done in previous dockets for similar matters.

Respectfully submitted,

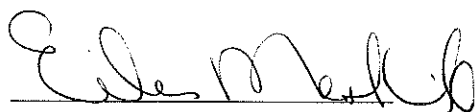
CONNECTICUT DEPARTMENT  
OF TRANSPORTATION

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Service is hereby certified  
to all parties and intervenors  
listed on this agency's service  
list for this consolidated  
proceeding.



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Assistant Attorney General