

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

**THE CONNECTICUT LIGHT AND POWER
COMPANY APPLICATION FOR CERTIFICATES
OF ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONNECTICUT
VALLEY ELECTRIC TRANSMISSION
RELIABILITY PROJECTS WHICH CONSIST OF
(1) THE CONNECTICUT PORTION OF THE
GREATER SPRINGFIELD RELIABILITY
PROJECT THAT TRAVERSES THE
MUNICIPALITIES OF BLOOMFIELD, EAST
GRANBY, AND SUFFIELD, OR POTENTIALLY
INCLUDING AN ALTERNATE PORTION THAT
TRAVERSES THE MUNICIPALITIES OF SUFFIELD
AND ENFIELD, TERMINATING AT THE NORTH
BLOOMFIELD SUBSTATION; AND (2) THE
MANCHESTER SUBSTATION TO MEEKVILLE
JUNCTION CIRCUIT SEPARATION PROJECT IN
MANCHESTER, CONNECTICUT.**

DOCKET 370

And

**NRG ENERGY, INC. APPLICATION PURSUANT
TO C.G.S. §16-50I(A)(3) FOR CONSIDERATION OF
A 530 MW COMBINED CYCLE GENERATING
PLANT IN MERIDEN, CONNECTICUT.**

JANUARY 15, 2010

PROPOSED FINDINGS OF FACT

ISO New England Inc. (the "ISO"), which is supportive of CL&P's Proposed Findings of Fact submitted on January 4, 2010 with respect to the GSRP and the MMP, is not submitting a complete set of proposed Findings of Fact, but instead proposes that the following Findings be included in the Council's Findings of Fact in this proceeding:

1. The ISO is responsible for managing the New England region's bulk electric power system, operating the wholesale electricity market, administering the region's open access transmission tariff, and conducting centralized electrical power planning (FF 19, CSC Docket 272)

2. In June, 2001, the FERC delegated to the ISO the responsibility to conduct long-term system planning for the New England region, which has been known since 2005 as the regional system planning (RSP) process. This process is continuous and results in an annual report developed by RSP participants and reviewed by state regulators, regional stakeholders and interested parties. (FF 20, CSC Docket 272)
3. On February 1, 2005, the FERC granted RTO status as a Regional Transmission Organization (“RTO”), providing it with broader authority for its functions. As an RTO, the ISO undertakes the role of security coordinator for the New England region and must maintain reliability of the system consistent with established NERC reliability standards. Pursuant to its tariff and agreements with transmission owners, the ISO acts as the Reliability Authority for the New England transmission system and can obligate transmission owners to upgrade existing transmission lines or construct new ones as necessary to assure reliability. *Regional Transmission Organizations*, Order No. 2000, 65 Fed. Reg. 809 (2000), FERC Stats. & Regs. ¶ 31,089 (1999), *order on reh'g*, Order No. 2000-A, 65 Fed. Reg. 12,088 (2000) Docket No. RM99-2-000, pp. 278-79, 323; ISO Ex. 4, Mezzanotte PFT, pp. 7-8; CSC Admin Notice Item 54, "Transmission Operating Agreement" among ISO New England and Participating Transmission Owners. ISO-NE. February 1, 2005, p. 1; *Id.*, Sched 3.09(a), Sections 1.1(a), 2.3; CSC Admin Notice Item 32, “Planning FERC Electric Tariff No. 3, Open Access Transmission Tariff, Section II – Attachment K – Regional System Planning Process.” ISO-NE. December 7, 2007. *Id.*, Section I.
4. The RSP is a comprehensive electrical engineering assessment comprised of numerous studies and analyses of the New England bulk electric power system. (FF 21, CSC Docket 272)
5. The RSP is intended to provide information to the wholesale electricity marketplace concerning power system problems and needs that may be addressed through investment in market solutions. Absent market response, the ISO is charged with providing a coordinated transmission plan that identifies upgrades for reliability and economic needs. (FF 22, CSC Docket 272)
6. Transmission infrastructure must meet reliability standards set by the North American Electric Reliability Corporation (NERC), Northeast Power Coordinating Council (NPCC) and the ISO. Such standards reflect tests for transmission contingencies, and various dispatch scenarios, such as the unavailability of multiple generation units and/or transmission lines in a local area. (FF 57, CSC Docket 272; FF 34, CSC Docket 217)
7. The ISO has determined that transmission reliability, the ability to supply area load under all design contingency events, within all applicable equipment ratings, independent of specific local generation, and while maintaining the

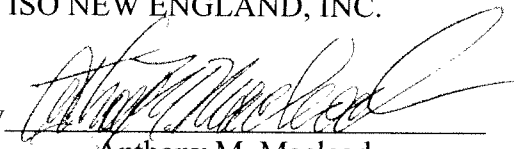
needs of the region, is a major concern for the electric transmission system in Greater Springfield and north central Connecticut. (ISO Ex. 4, p.3)

8. Without the GSRP and the MMP, the electric transmission system serving the Greater Springfield area and north central Connecticut will be in violation of applicable reliability standards and criteria of NERC, NPCC and the ISO. (CL&P Ex. 1, Vol. 5, Ex. 1, "Southern New England Transmission Reliability Report 1, Needs Analysis"; CL&P Ex. 14, Supplemental Response to OCC Interrogatories, Set One, Question 9, dated June 22, 2009 (the "Addendum"); 10/27/09 Tr. 214)
9. NRG's proposed Meriden generation plant is too electrically remote to resolve reliability issues in the Greater Springfield area, including north central Connecticut and is not a substitute for the GSRP and the MMP in meeting the needs those projects are intended to address. (10/27/09 Tr. 196; 10/28/09 Tr. 18)
10. The GSRP and the MMP will address reliability issues by eliminating thermal and voltage criteria violations and improving transfer capabilities and will enable the transmission system to comply with reliability standards and criteria of NERC, NPCC and the ISO. (ISO Ex. 4, p.14)

Respectfully Submitted,


ISO NEW ENGLAND, INC.

By


Anthony M. Macleod
Whitman Breed Abbott & Morgan LLC
500 West Putnam Avenue
Greenwich, Connecticut 06830
(203) 862-2458
amacleod@wbamct.com
Attorneys for
ISO New England Inc.

CERTIFICATION

I hereby certify that a copy of the foregoing was hand delivered or sent via email or first class mail, postage prepaid, on January 15, 2010 to all parties and intervenors of record as shown on the attached service list.



Anthony M. Macleod
Commissioner of the Superior Court