

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Connecticut Light & Power Company

Docket No. 424

application for the

Interstate Reliability Project

November 23, 2012

Comments on the Draft Findings of Facts

To: Ms. Linda Roberts
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, Ct 06051

The undersigned party respectfully requests the following modifications to the Draft Findings of Facts (Findings).

A. ADDITIONS:

Addition of Fact 1: If the Shunock CT to Woodriver RI line is severed the Connecticut rate payer would not lose service.

From the August 28, 2012 transcript at pg 44 at 3:

"MR. V. CIVIE: Let's say the line was severed, would any -- and everything was working functionally in Connecticut. Would a Connecticut person lose service?"

MR. OBERLIN: Ignoring any configuration issues at [Shunock], no."

Addition of Fact 2: The Connecticut rate payer would not lose service in the event of an overload of the Shunock CT to Woodriver RI line.

If an overload occurs three possibilities exist.

1. If a circuit breaker does not trip, then the line will be overloaded. Power will be still be transferred until the wires fail. There will be no loss of service.
2. If a circuit breaker does not trip and the line fails due to overload, then this event is equivalent to a severed line. There will be no loss of service.
3. If a circuit breaker trips, then this event is the electrical equivalent of severed line. There will be no loss of service.

In each and every scenario there will be no loss of service to the Connecticut rate payer. Thus if the Shunock CT to Woodriver RI line is overloaded the Connecticut rate payer would not lose service.

Notes

1. The studies do not determine that an overload in the Shunock CT to Woodriver RI line was resolved by the new proposed Card to Lake Road line.
2. If a circuit breaker does not trip then the solution is to install a new circuit breaker. A responsible planner would not make a decision to spend \$218 million of Connecticut and New England's money for a new line when the small cost of a new breaker would solve the problem.
3. In a well designed circuit the circuit breaker should trip before the wires suffer damage from an overload.
4. Any additional power required will be supplemented from the west as provided by the study.

Addition of Fact 3: The projects proposed Card to Lake Road Lines do not resolve any violation located entirely in State of Connecticut.

In the 2012 Followup analysis there were only two lines that are located entirely in the state of Connecticut that had hypothetical violations (Connecticut Violations). These are the Whipple JCT to Mystic CT Line and Mystic CT to Shunock Line. Table 6-5 page 37 shows the results after the Interstate projects proposed Lake Road to West Farnum lines were added.

In both tables 6-4 and 6-5 the Interstate proposed Card to Lake Road lines were not connected. The Connecticut Violations are shown in table 6-4 page 37. These violations no longer exist in Table 6-5. Thus the Connecticut Violations were resolved (moving from table 6-4 to 6-5) without the project's proposed Card to Lake Road lines.

From August 28 transcript :

Pg 60, 13 MR. V. CIVIE: Table 6-5 are the Level 2 results after the new Lake Road to West Farnum lines are added, correct? And this is prior to the Card to Lake Road street lines were added, correct? MR. OBERLIN: That is correct.

Pg 61,5 MR. V. CIVIE: so do we see any violations there that affect Connecticut in Table 6-5? MR. OBERLIN: No.

Pg 61, 10 MR. V. CIVIE: ... going from Table 6-4 to 6-5, we no longer have those problems in Connecticut, correct?

MR. OBERLIN: Again, I agree the Connecticut issue has been resolved, but the system network issue has not been resolved.

B. CORRECTIONS:

The undersigned party respectfully requests modifications to the following Draft Findings of Facts (Findings) paragraphs.

P 18 states "The Need for the Interstate Reliability Project was first identified ...".

Correction: Add "except for the Card to Lake Road segment".

The Card to Lake Road segment is part of the Interstate Reliability Project. A need for this segment of the project was never identified.

P 63 states "The particular contingencies modeled are simulated for reasonably stressed conditions."

Correction: eliminate the words "reasonably stressed conditions".

The conditions modeled were not reasonable. In the Study Millstones was out, Cross cable was out, Norwalk cable was out, all of New York was out and Berkshire was out all occurring during peak summer times. Over 4100 megawatts of available import power was removed. (*August 28 Transcript pg 24-25*) "5.2 Reasonably Stressed Conditions Reasonably stressed conditions are those severe load and generation system conditions which have a reasonable probability of actually occurring." Iso New England Planning Procedure PP5-3 (*August 28 Transcript pg 29*) The probability for all this import to be out at once is not reasonable.

P 64 states "Increase in import capacity into Connecticut would allow for protection against generator retirements".

Correction: Eliminate entirely

The statement makes the false assumption that Connecticut would need protection from generator retirements.

It has not been established that an increase in import capacity is needed. For example the Card to Lake Road line can handle any import power increases in the future. Under the unreasonable extreme stressed conditions of the studies the maximum power through the Existing Card to Lake Road line was 1,415 megawatts. (*August 28 Transcript pg 59*). The Existing Card to Lake Road line has a capacity of 1,912 megawatts which is more than sufficient to carry the necessary additional loads without any modification. (*August 28 Transcript pg 59, Iso response Table 3-A Page 2 of 2, Forth Physical Page*).

In addition, new replacement generation has not been considered.

In the second sentence the renewable generation from New York and Canada was not discussed at the reference provided nor was it proven at anytime.

P 74 Correction: Eliminate the entire paragraph

There is no foundation to accept this as a standard or this statement as fact.

P 77 Correction: Eliminate the entire paragraph

This paragraph is not correct. Connecticut can import 100% of its peak load. The Connecticut import from Millstones is 2100MW p19, Cross cable is 330MW p22, Norwalk cable is 200MW p23, and New York is 1400MW p21. In addition there is Card to Lake road Line 330 1900MW(*August 28 Transcript pg 59 ,Iso response Table 3-A Page 2 of 2, Forth Physical Page*). GSRP 2040MW (Council Admin, Notice 33 Vol1 I.4.2 Docket 370A) and MMP 680MW (Council Admin, Notice 33 Vol1 I.4.2 Docket 370A). The total for these Connecticut imports is 8650MW which is over 100% of Connecticut's peak total load.

P 81 states "The Interstate project is needed ..."

Correction: Add "except for the Card to Lake Road segment"

The Card to Lake Road segment is part of the Interstate Reliability Project. A need for this segment of the project was never demonstrated or proven.

P 83. states "The Interstate Project is still needed."

Correction: Add "except for the Card to Lake Road segment"

The Card to Lake Road segment is part of the Interstate Reliability Project. A need for this segment of the project was never demonstrated or proven.

P 91 states "The year of need for the Interstate Project ... "

Correction: Add "except for the Card to Lake Road segment"

The Card to Lake Road segment is part of the Interstate Reliability Project. A need for this segment of the project was never demonstrated or proven.

P 97 is incorrect. Correction: Remove. There are differences in the needs, for example the appearance of the Mystic lines in the 2012 analysis differs from the 2011 analysis.

Again the needs are alleged. No violations in either report that effect Connecticut have been attributed to the Card to Lake Road segment.

P 109 states "The electrical system in the region and specifically in the Connecticut ... area would not comply with national and regional reliability standards and criteria.

Correction : Eliminate "Connecticut"

There is no foundation for this statement. No violations that effect Connecticut have been attributed to the Card to Lake Road segment. A No Action Alternative for the Card to Lake Road segment would implicitly comply with national and regional reliability standards and criteria.

P 272 is incorrect. Correction: Replace with " Three cable sets/circuits have never been used in any Connecticut underground configuration in the past. "

Three cable sets/circuits have never been used in any underground configuration in the past.

From (June 4, 2012 Transcript pg 160 at 10)

"VICTOR CIVIE: Where do you see in past designs three circuits on underground?"

....

MR. CARBERRY: And in other projects before that we have not had the same need for the same capacity and so have not done that. "

Two circuits have enough power to accommodate the current project. Two circuits provide a total of 1200 normal or 2000 peak emergency. The average power here was 600 with a 1200 peak. pg 68 June 5, 2012. See also pg 71 at 8.

P 274 is incorrect. Correction: Remove. A typical example of a straight underground transition is

Hoyts Hill which required a base of 115 feet by 90 feet or .25 acres. Bethel/Norwalk Project, 12-C application dated February 7, 2005.

p 276 is incorrect. Correction: Remove. Rebutted by Civie 4.

p 319 is incorrect. Civie 3 Appendix A "No ledge has been found to 20'." Also in the transcript this area is relatively flat.

p 323 is incorrect. See CL&P Vol 1a Appendix p 15B-3 where no trees will be cut and underground duct is 3'by 3'. Also Civie 3 p2 The underground plan requires a 10' width over a length of 5800' (Civie 4) is 1.3 acres.

p 325 is incorrect. Correction: Remove. There are no soils of this nature documented

p326 is incorrect. Correction: Remove. There is no documentation of water courses or ponds that are nearby to effect the project. There are two small seasonal wetlands which exist sometimes during the spring.

P 332 is incorrect. Correction: Remove. Rebutted by Civie 4.



Victor Civie
160 Beech Mt Road
Mansfield CT 06250
860-456-2022



I hereby certify that a copy of the foregoing document was (electronically mailed/sent by U.S. mail) to the Docket No. 424 service list on (11/23/12).

Victor Civie