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Connecticut Light & Power Company

Docket No. 424

application for the

Interstate Reliability Project

December 6, 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:

"5.2 Reasonably Stressed Conditions

Reasonably stressed conditions are those severe load and generation system conditions which have a reasonable probability of actually occurring."

(Admin 14, ISO New England Planning Procedure 5-3, PP5-3 section 5.2)(*Transcript August 28 pg 29*)

A total of 227 wetlands and 104 watercourses were identified along the CL&P ROWs associated with the Proposed Route (CL&P 1, Vol 2 Page 10)

Sixty-two wetlands located along the ROWs that the Proposed Route would follow were determined to contain vernal pools for obligate species and 26 wetlands were determined to contain amphibian breeding habitats (i.e., areas not meeting the specific criteria defined by the State of Connecticut to be considered a vernal pool). Several wetlands contained multiple vernal pool and/or amphibian breeding habitat areas within one wetland system. As a result, 88 vernal pools and 29 amphibian breeding habitats were identified in total. (CL&P 1, Vol 2 Pg 11)

50 acres of Connecticut forested wetlands will be permanently converted to shrub scrub or emergent marsh (*June 4, 2012 Transcript pg 88*)

268 acres of forest and forest wetlands will be removed. (*June 4, 2012 Transcript pg 90*)

The association to EMF's and childhood leukemia can not be ruled out. There is a possibility that there might be an association to childhood leukemia. ("DR. BAILEY: So we have this growing body of evidence, but none of this evidence is -- has a sufficiently large population with sufficiently high exposures to completely rule out the possibility that there might be an association." (June 4 Transcript p75))

B. CORRECTIONS:

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

72 Correction: Either Remove paragraph or Substitute "Interstate" with "Part of the Interstate" and Remove line d.

Assumes there is a need. "The Interstate project is designed to address the following needs." assumes there is a need to increase the transfer capacity into Connecticut. No evidence was presented that there is a need to increase the transfer capacity. In addition Refer to P 84 below. Connecticut has more than enough import capacity for transfer.

The Studies do not show that the addition of the new proposed Card to Lake Road lines will resolve any thermal or voltage violations or increase transfer capability into Connecticut. The Applicant does not claim that the new proposed Card to Lake Road lines will resolve any thermal or voltage violations or increase transfer capability into Connecticut.

73 Correction: Remove the words "Card Street" and phrase "providing a line into Card street" The statement is misleading. No evidence has been presented where the Card Street lines/corridor has been attributed to resolve any thermal or voltage violations. 73b is inaccurate. There is no evidence that by "providing a line into Card street" would "resolve any thermal or voltage violations."

75 Correction: Remove paragraph. There is no proof that the thermal overloads on critical transmission lines in Massachusetts provide any power to Connecticut. Nor is there any proof that a voltage collapse of the Rhode Island transmission system could propagate into Connecticut.

83 Correction: Remove paragraph. No evidence has been provided to support this statement.

84 Correction: Remove paragraph.

The 33 percent figure in this context is simply not correct. This figure was calculated based on a limited portion of Connecticut under specific restricted conditions.

No evidence has been presented to nor do the references at the end of paragraph 84 CL&P 1, Vol1,ES-10 and CL&P 16 substantiate or provide evidence that
1. Connecticut has the least ability to import power

2. The limit on Connecticut's import would be approximately 33 percent of its peak load. The paragraph should be removed on these points alone.

Notwithstanding, Connecticut import capacity is over 100% of its peak load. (See below). If the this paragraph is to be construed to be as a limit due to generation and not maximum capacity it must be stated as such. Even if stated as such it still has to be proven. Even from a generation standpoint these statements as they stand still fail.

From the facts in evidence:

The Ludlow MA to Barbour CT (3419) line supplies 2,500MW. "Under typical dispatch conditions, the 345-kV line from Ludlow may supply 30% of the maximum Connecticut import capability of approximately 2,500 MWs⁹". (Council Admin, Notice 33 Vol1 pF-23, To see where this line is located refer to Map Page E-4 Figure E-1).

The GSRP North Bloomfield CT to Agawam MA(3216) line can import 2040MW (Council Admin, Notice 33 Vol1 Page I-10. To see where this line is located refer to Map Page E-4 Figure E-1)

In addition there is the Cross cable 330MW p22, Norwalk cable is 200MW p23, and New York is 1400MW p21.(August 28 Transcript) for a total of 1930MW.

Furthermore there is the Card to Lake Road Line 330 or the Lake Road Sherman Road line 347 with a capacity of 1912MW(August 28 Transcript pg 59, ISO 4 Table 3-A Page 2 of 2 Forth Physical Page, CL&P Admin Notice 26 p3, To view location refer to ISO-NE Draft Report entitled: Follow-Up Analysis to the 2012 New England East-West Solution (NEEWS) Interstate Reliability Project Component Updated Solution Study Report, July 2012 pg33 Figure 5-2) (Line 347 is on the Connecticut Boarder. Line 330 is on the imaginary CL&P boarder. No matter which line is used for the calculation, the import capacity into Connecticut is 1912MW)

At this juncture , adding all the above, the total Connecticut capacity is 8382MW.

The peak load for 2012 from "Figure 1c: Extreme Weather and 90/10 Forecasts" in MW(Council Admin Notice 26 p9) is roughly 8000MW.

Hence the limit on Connecticut's import is $8382/8000\text{MW} = 104\%$ which refutes the 33 percent figure. 8382MW does not include the rest of Connecticut which should be included if the words "Connecticut's import" are used. The proposed Lake Road CT to West Farnum RI 341 line will add at few thousand MW (again refer to p33 Figure 5-2.) There are other lines that also import power into Connecticut.

If the limit on Connecticut is to be construed as a limit in generation capability the statements are irrelevant. The applicants solution is based on hardware capacity not generation. That is the Applicant proposes to increase the capacity of the system not add generation to the system.

Increasing the capacity will not fix problems in generation. From a generation standpoint the 33 percent figure still fails. The Ludlow MA to Barbour CT (3419) line supplies 2,500MW alone. (See above)

Conclusion:

The statements are not facts for the following reason.

1. The limit on Connecticut import is the total capacity divided by the load which is over 100% and is greater than 33% as stated.
2. The limits on Connecticut import based on generation is greater than 33 percent as stated.
3. The limit on Connecticut import based on generation is irrelevant. Increasing the capacity as proposed in the Applicants solution does not provide a solution for problems in generation.
4. No proof or evidence has been provided to support the 33 percent figure.
5. Hence no proof or evidence has been provided to support the statement that Connecticut has the least ability to import power.

. The paragraph should be deleted.

88 Correction: Remove paragraph. This statement is misleading. Implies a "need situation" in Connecticut. This has not been proven. In addition the statement does not consider new generation (ex NRG in Meriden and GE Financial in Oxford. CL&P 10 p16) taking the place of old generation.

89 Correction: Remove paragraph. No evidence or proof of any kind has been offered to substantiate this statement.

94 Correction: Remove paragraph. There is no evidence that the Card to Lake Road section of the Interstate was "designed" to "provide adequate transmission transfer"

95 Correction: Remove paragraph.. Assumes that there is a "need" for transfer capacity into Connecticut. This has not been proven.

504 Correction: remove paragraph. This information conflicts with Civie 4.

542 Correction: Replace "the extension of the underground cables to the west past proposed Structure Nos, 67 and Pole 66." with "the extension of the underground cables to the west at Structure 67" There are two sets of numbers for the pole locations. The exact placement of the transition station is at Pole 9066 and Pole 67. Pole 9066 and Pole 67 are at the same location. (See Cl&P 1 Vol.9, Mount Hope Variation, Map Sheet 1 of 2).

MR. FITZGERALD: And do you see any construction problems that would relate to those wetlands?

MR. V. CIVIE: Oh, at 66, certainly. That's not the proposed or what we're suggesting. At 67 the hill flattens out, there's plenty of space for a transition station. (Transcript August 30, 2012

pg52, ln16)

544 Correction: Remove entire paragraph - No technical data or study was presented to verify this statement.

The applicant did not dig test holes or perform other subsurface investigation. The Civie's presented subsurface technical data and studies to the contrary.

MR. VICTOR CIVIE: Alright. Did you dig a test hole to determine the rock content of the area?

MR. CASE: No. We -- in this area these estimates are conceptual. We have not yet done any subsurface investigation. (Transcript June 26, 2012 p80 ln 1)

The Civies subsurface findings were based on extensive testing and investigation. "The majority of the lots have deep well drained soils ... Typical soil analysis shows 3-4 feet light brown/orange fine sandy loam, loose and to 10' grey very fine to fine sand, some silt. No ledge has been found to 20'."

(Civie 3 Appendix A)

Also

V. CIVIE: The wetlands are further down, that is down the hill from 67, yes. You're talking to the west -- or south, correct?

MR. FITZGERALD: And do you see any construction problems that would relate to those wetlands?

MR. V. CIVIE: Oh, at 66, certainly. That's not the proposed or what we're suggesting. At 67 the hill flattens out, there's plenty of space for a transition station.

MR. FITZGERALD: What do you -- what do you mean that the hill flattens out?

MR. V. CIVIE: Well basically at 68 you're on top of the hill, 67 you're on the hill a little bit. However, what -- the hill is not continuous. That is at that point or around that point there's a level spot. And then by the time you get to the wetlands there's a very steep drop.

MR. FITZGERALD: Now what is the -- what is the slope of that existing terrain where you would propose to put the termination station?

MR. V. CIVIE: Well the slope would be almost zero.

MR. FITZGERALD: Have you looked at the topographical renderings that are in the application?

MR. V. CIVIE: I live there. (Transcript August 30, 2012 pg52, ln 10)

551 Correction: Remove entire paragraph "These wetlands would be spanned by the proposed overhead project" Does not portray true conditions. A significant amount of valued Forested wetlands will be destroyed.

"Underground cables take up less space than their overhead counterparts. The underground plan requires only a ten foot width. This saves 90 foot width of forest that is proposed to be cut." (Civie 3) Referring to CL&P Figure 3 Cross Section (CL&P 1, Vol 1 Appendix p7B-41) the distance between the "Existing edge of vegetation" and the "New edge of vegetation" is 90 feet. No forest will be cut in the underground variation. This is evident in CL&P underground variation cross section. (CL&P 1, Vol 1a Appendix p 15B-3)

552 Correction: Remove entire paragraph The Civie's transition station is located at proposed structure Pole 9066 and Pole 67 which is well removed from the wetlands. See (Transcript August 30, 2012 pg52, ln 10) above. Also (Cl&P 1 Vol.9, Mount Hope Variation, Map Sheet 1 of 2)

A handwritten signature in cursive script that reads "Victor Civie". The signature is written in black ink and is positioned above the typed name.

Victor Civie
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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 (12/6/12).