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Anthony M. Fitzgerald

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By Hand

February 9, 2012

Connecticut Siting Council Ten Franklin Square New Britain, CT 06051 Attn: Melanie Bachman, Staff Counsel

Re: Docket No. 424

The Connecticut Light & Power Company's application for a Certificate of Environmental Compatibility and Public Need for the Connecticut portion of the Interstate Reliability Project

Dear Ms. Bachman,

In accordance with the Siting Council's Procedures for Filing Proprietary Information Under Protective Order (Procedures), I submit with this letter the Critical Energy Infrastructure (CEII) Appendix to the above captioned application (the Application), together with a Motion for Protective Order and the required supporting documentation.

The table of contents for the Application identifies the contents of the CEII Appendix (which was not filed with the rest of the application) as:

PART A – NON-REDACTED PLANNING REPORTS

- EX. 1: ISO-NE, "Southern New England Transmission Reliability, Report 1 Need Analysis," January 2008
- EX. 2: ISO-NE, "New England East-West Solutions (Formerly Southern New England Transmission Reliability), Report 2 Options Analysis," June 2008
- EX. 4: ISO-NE, "New England East-West Solution (NEEWS): Interstate Reliability Project Component Updated Needs Assessment," April 2011
- EX. 5: ICF Inc., "Assessment of Non-Transmission Alternatives to the NEEWS Transmission Projects: Interstate Reliability Project," December 2011

PART B – PHYSICAL SECURITY OF PROPOSED FACILITY



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Each of the above documents is included in the enclosed CEII Appendix. The designations of each of the reports in Part A follows that of the redacted reports provided in Volume 5 of the Application. There is no EX. 3 in the CEII Appendix because the counterpart document in Volume 5 of the Application, the initial 2008 Solution Report, does not contain CEII and so was provided in a non-redacted format.

In addition, the enclosed CEII Appendix contains one additional document not listed in the Application's Table of Contents. This document was posted in final form by the Independent System Operator – New England on its website on February 3, 2012, and is submitted as Exhibit 6 to Part A of the CEII Appendix. The full designation of this document is:

EX. 6 ISO-NE, "New England East-West Solution (NEEWS): Interstate Reliability Project Component Updated Solution Study Report" February 2012

The document is referenced in the Application as the "Updated Solution Report." When the Application was filed, the applicant expected that the Updated Solution Report would not be completed and released until after the CEII Appendix was filed, so that it would have to be filed separately at a later time. *See*, Application, Vol. 1A, §13.1, p. 13-2.

Please note that the appendices to each of the Updated Needs Assessment and the Updated Solution Report, most of which are very large, are provided on Compact Disc. In addition, the shorter appendices (Updated Needs Assessment Appendices A and C and Updated Solution Report Appendices A, D, and J) are also included with the hard copy of the reports.) The files on the discs can most conveniently be opened with Windows Explorer and then reviewed by displaying and using the embedded bookmarks.

As required by the Procedures, one copy of each of the documents listed above has been placed in a sealed envelope bearing the documents' descriptive titles and labeled "CONFIDENTIAL – CEII, filed by The Connecticut Light and Power Company, February 9, 2012."

Redacted versions of each of the Part A documents have previously been filed in Volume 5 of the Application, with two exceptions: 1) ISO-NE has not yet issued a redacted version of the Updated Solution Report. That document is undergoing redaction review now. As soon as the applicant receives a copy of the redacted Updated Solution Report, it will file an original and 20 copies with the Siting Council as a supplement to the Application, and will provide copies to the service list; 2) the applicant did not file a



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redacted copy of Part B of the CEII Appendix with its application, and is therefore providing a an original and 20 copies of a redacted version with this letter.

As further required by the Procedures, I enclose an original and 20 copies of the following documents in consecutive order:

- a. A Motion for Protective Order and a Memorandum of Law (with exhibits) describing the legal standards upon which the motion is based;
- b. An affidavit of Allen W. Scarfone stating specifically why the information should be protected;
- c. A proposed Protective Order for signature by the Chairman;
- d. A proposed Non-Disclosure Agreement for signature by requesters of the proprietary information; and
- e. A proposed Request for Information for completion by persons seeking access to the proprietary information.

Very truly yours,

Anthony M. Fitzgeyald

cc (with copies of enclosures (a) - (e) listed above and redacted copy of CEII Appendix Part B): CSC Service List dated Jan. 26, 2012

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

The Connecticut Light & Power Company Application for a Certificate of Environmental Compatibility and Public Need for the Connecticut Portion of the Interstate Reliability Project that traverses the municipalities of Lebanon, Columbia, Coventry, Mansfield, Chaplin, Hampton, Brooklyn, Pomfret, Killingly. Putnam, Thompson, and Windham, which consists of (a) new overhead 345-kV electric transmission lines and associated facilities extending between CL&P's Card Street Substation in the Town of Lebanon, Lake Road Switching Station in the Town of Killingly, and the Connecticut/Rhode Island border in the Town of Thompson; and (b) related additions at CL&P's existing Card Street Substation, Lake Road Switching Station, and Killingly Substation.

Docket No. 424

February 9, 2012

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing transmittal letter with the following enclosures:

Motion for Protective Order and Memorandum of Law (with exhibits)
Affidavit of Allen W. Scarfone
Proposed Protective Order
Proposed Non-Disclosure Agreement;
Proposed Request for Information

Redacted copy of CEH Appendix Part B

have been served on this 9th day of February, 2012 upon all parties and intervenors as referenced in the Connecticut Siting Council's Service List dated January 26, 2012.

Anthony M. Fitzgerald

LIST OF PARTIES AND INTERVENORS $\underline{SERVICE\ LIST}$

	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Applicant	⊠ U.S. Mail	The Connecticut Light & Power Co. P.O. Box 270 Hartford, CT 06141-0270	Robert E. Carberry, Project Manager NEEWS Siting and Permitting Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-6774 (860) 665-6717 fax
	U.S. Mail		carbere@nu.com
	 -		Jane P. Seidl, Senior Counsel Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5051 (860) 665-5504 fax seidljp@nu.com
	⊠ U.S. Mail		Anthony M. Fitzgerald, Esq. Carmody & Torrance LLP 195 Church Street P.O. Box 1950 New Haven, CT 06509-1950 (203) 777-5501 (203) 784-3199 fax afitzgerald@carmodylaw.com
Party (if granted 02/16/12)	⊠ E- Mail	NRG Energy, Inc., NRG Power Marketing, Inc., Connecticut Jet Power LLC, Devon Power LLC, Middletown Power LLC, Montville Power LLC, Norwalk Power LLC, and Meriden Gas Turbines, LLC (collective, NRG)	Andrew W. Lord, Esq. Murtha CUllina LLP CityPlace I, 29 th Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6000 alord@murthalaw.com
	⊠ U.S. Mail		Elizabeth Quirk-Hendry General Counsel, Northeast Region NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540-6213
	⊠ U.S. Mail		Judith E. Lagano NRG Energy, Inc. Manresa Island Avenue South Norwalk, CT 06854

LIST OF PARTIES AND INTERVENORS SERVICE LIST

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	⊠ U.S. Mail	NRG continued	Raymond G. Long NRG Energy, Inc. P.O. Box 1001 1866 River Road Middletown, CT 06457
Party (if granted 02/16/12)	⊠ U.S. Mail	Victor Civie 160 Beech Mt. Road Mansfield, CT 06250 (860) 456-2022	
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