

WHITMAN BREED ABBOTT & MORGAN LLC

ATTORNEYS AT LAW

500 WEST PUTNAM AVENUE

P.O. Box 2250

GREENWICH, CONNECTICUT 06830

203-869-3800

TELECOPIER: 203-869-1951

WRITER'S E-MAIL ADDRESS:

[amacleod@wbamct.com](mailto:amacleod@wbamct.com)

WRITER'S DIRECT DIAL NUMBER:

(203) 862-2458

August 20, 2012

VIA OVERNIGHT AND ELECTRONIC MAIL

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

**Re: Docket No. 424, The Connecticut Light and Power Company's Application for a Certificate of Environmental Compatibility and Public Need for the Connecticut Portion of the Interstate Reliability Project**

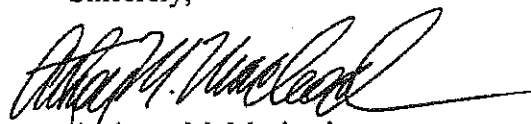
Dear Ms. Roberts:

On behalf of ISO New England Inc. (the "ISO"), we are filing herewith an original and fifteen copies of the ISO's Responses to the Connecticut Siting Council's First Set of Interrogatories to the ISO in the above-referenced docket.

The enclosed Responses are also being filed with the Siting Council electronically and distributed to the Service List.

Please let me know if you have any questions regarding the enclosed filing.

Sincerely,



Anthony M. Macleod

Enclosures

cc: Kevin Flynn, Esq.  
Ms. Christina Walsh  
Service List

**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

**ISO New England Inc.**  
**Docket 424**

**Witness: Stephen Rourke**  
**Page 1 of 1**

**CSC-1.** What is the extent of ISO-NE's interest in The United Illuminating Company (UI) purchase of portions of the Connecticut section of the NEEWS projects?

**Response:** Generally, ISO-NE has limited interest in ownership agreements between different transmission owners, including the agreement between CL&P and UI on the Connecticut section of NEEWS. Such ownership agreements are business arrangements which occur outside of ISO-NE's purview.

**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

**ISO New England Inc.**  
**Docket 424**

**Witness: Stephen Rourke**  
**Page 1 of 1**

**CSC-2.** Does ISO-NE contribute in determinations what portions of the projects  
UI may purchase per the "Agreement Re: Connecticut NEEWS Projects"?

**Response:** No.

**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

**ISO New England Inc.**  
**Docket 424**

**Witness: Stephen Rourke**  
**Page 1 of 1**

**CSC-3.** How would UI's ownership outside of its service territory affect franchise/territory rights?

**Response:** This question is not within ISO-NE's area of responsibility or expertise and would be best asked of CL&P and UI.

**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

**ISO New England Inc.**  
**Docket 424**

**Witness: Stephen Rourke**  
**Page 1 of 1**

**CSC-4.** How would the agreement for the purchase of portions of the Connecticut section of the NEEWS projects affect (UI and CL&P) consumer's electric rates?

**Response:** This question is not within ISO-NE's area of responsibility or expertise and would be best asked of CL&P and UI or its economic regulators.

**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

**ISO New England Inc.**  
**Docket 424**

**Witness: Stephen Rourke**  
**Page 1 of 1**

**CSC-5.** How does this transmission company agreement fit into transmission planning for the grid as a whole?

**Response:** This agreement should have no impact on transmission planning for the grid. The only foreseeable effect the agreement may have is that ISO-NE may have to work with multiple equipment owners, as it did with respect to the Middletown-Norwalk line, if upgrades to these portions of the project were found to be necessary in the future as part of ISO-NE's normal Regional System Plan process. ISO-NE does not view this agreement as an impediment to transmission planning.

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Applicant</b>	<input checked="" type="checkbox"/> 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 <a href="mailto:carbereg@nu.com">carbereg@nu.com</a>
	<input checked="" type="checkbox"/> U.S. Mail		Jane P. Seidl, Senior Counsel Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5051 (860) 665-5504 fax <a href="mailto:seidljip@nu.com">seidljip@nu.com</a>
	<input checked="" type="checkbox"/> 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 <a href="mailto:afitzgerald@carmodylaw.com">afitzgerald@carmodylaw.com</a>
<b>Party (granted 02/16/12)</b>	<input checked="" type="checkbox"/> 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 <sup>th</sup> Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6000 <a href="mailto:alord@murthalaw.com">alord@murthalaw.com</a>  Elizabeth Quirk-Hendry General Counsel, Northeast Region NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540-6213 <a href="mailto:Elizabeth.Quirk-Hendry@nrgenergy.com">Elizabeth.Quirk-Hendry@nrgenergy.com</a>

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	<input checked="" type="checkbox"/> E-Mail	NRG continued...	<p>Judith E. Lagano NRG Energy, Inc. Manresa Island Avenue South Norwalk, CT 06854 <a href="mailto:Judith.Lagano@nrgenergy.com">Judith.Lagano@nrgenergy.com</a></p> <p>Raymond G. Long NRG Energy, Inc. P.O. Box 1001 1866 River Road Middletown, CT 06457 <a href="mailto:Ray.Long@nrgenergy.com">Ray.Long@nrgenergy.com</a></p> <p>Jonathan Gordon NRG Energy, Inc. P.O. Box 1001 1866 River Road Middletown, CT 06457 <a href="mailto:Jonathan.Gordon@nrgenergy.com">Jonathan.Gordon@nrgenergy.com</a></p> <p>Peter Fuller NRG Energy, Inc. 270 Cherry Street Bridgewater, MA 02324 <a href="mailto:Peter.Fuller@nrgenergy.com">Peter.Fuller@nrgenergy.com</a></p>
<p><b>Grouped (6/4/12)</b></p> <p><b>Party (granted 02/16/12)</b></p> <p><b>Party (granted 04/12/12)</b></p>	<input checked="" type="checkbox"/> U.S. Mail	The Civies	<p>Victor Civie 160 Beech Mt. Road Mansfield, CT 06250 (860) 456-2022</p> <p>Richard Civie 43 Main Street East Haven, CT 06512 (203) 795-3604 <a href="mailto:Kccasey3@hotmail.com">Kccasey3@hotmail.com</a></p>



**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<p align="center"><b>Party (granted 03/01/12)</b></p>	<input checked="" type="checkbox"/> U.S. Mail	<p>EquiPower Resources Corp., Lake Road Generating Company LP, and Milford Power Company LLP (collectively, EquiPower)</p>	<p>Donna Poresky Senior Vice President and General Counsel EquiPower Resources Corp. 100 Constitution Plaza, 10<sup>th</sup> Floor Hartford, CT 06103 (860) 656-0814 <a href="mailto:DPoresky@eqpwr.com">DPoresky@eqpwr.com</a></p>
	<input checked="" type="checkbox"/> U.S. Mail		<p>Jim Ginnetti EquiPower Resources Corp. 100 Constitution Plaza, 10<sup>th</sup> Floor Hartford, CT 06103 <a href="mailto:jginnetti@eqpwr.com">jginnetti@eqpwr.com</a></p>
	<input checked="" type="checkbox"/> E-Mail		<p>Kenneth C. Baldwin, Esq. Robinson &amp; Cole LLP 280 Trumbull Street Hartford, CT 06103 (860) 275-8200 (860) 275-8299 – fax <a href="mailto:kbaldwin@rc.com">kbaldwin@rc.com</a></p>
<p align="center"><b>Party (granted 03/15/12)</b></p>	<input checked="" type="checkbox"/> E-Mail	<p>The United Illuminating Company (UI)</p>	<p>Bruce L. McDermott, Esq. UIL Holdings Corporation 157 Church Street P.O. Box 1564 New Haven, CT 06506-0901 (203) 499-2422 (203) 499-3664 <a href="mailto:Bruce.mcdermott@uinet.com">Bruce.mcdermott@uinet.com</a></p>
	<input checked="" type="checkbox"/> U.S. Mail		<p>John J. Prete The United Illuminating Company 157 Church Street New Haven, CT 06506-0901 (203) 499-3701 (230) 499-3728 – fax <a href="mailto:uiregulatory@uinet.com">uiregulatory@uinet.com</a></p>

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Party (granted 04/12/12)</b>	<input checked="" type="checkbox"/> U.S. Mail	Edward Hill Bullard 42 Shuba Lane Chaplin, CT 06235 (860) 455-0003 <a href="mailto:Hbull39@hotmail.com">Hbull39@hotmail.com</a>	
<b>Party (granted 04/26/12)</b>	<input checked="" type="checkbox"/> U.S. Mail	The Office of Consumer Counsel	Elin Swanson Katz Consumer Counsel Ten Franklin Square New Britain, CT 06051 <a href="mailto:Elin.katz@ct.gov">Elin.katz@ct.gov</a>  Victoria Hackett Staff Attorney III Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 <a href="mailto:Victoria.hackett@ct.gov">Victoria.hackett@ct.gov</a>
<b>Party (granted 04/26/12)</b>	<input checked="" type="checkbox"/> U.S. Mail	Richard Cheney and the Highland Ridge Golf Range, LLC (Highland Ridge)	Eric Knapp, Esq. Branse, Willis & Knapp, LLC 148 Eastern Boulevard, Suite 301 Glastonbury, CT 06033 (860) 659-3735 (860) 659-9368 fax <a href="mailto:eknapp@bransewillis.com">eknapp@bransewillis.com</a>
<b>Party (granted 06/04/12)</b>	<input checked="" type="checkbox"/> E- Mail	Mount Hope Montessori School, Inc.	Keith R. Ainsworth, Esq. Evans Feldman & Ainsworth, L.L.C. 261 Bradley Street P.O. Box 1694 New Haven, CT 06507-1694 (203) 772-4900 (203) 782-1356 fax <a href="mailto:krainsworth@snet.net">krainsworth@snet.net</a>  Adam N. Rabinowitz, Board Chair Mount Hope Montessori School P.O. Box 267 Mansfield Center, CT 06250 <a href="mailto:adam@rabinowitzfamily.com">adam@rabinowitzfamily.com</a>

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<p><b>Intervenor (granted 07/26/12)</b></p>	<p><input checked="" type="checkbox"/> E-Mail</p>	<p>ISO-New England, Inc.</p>	<p>Anthony M. Macleod, Esq. Whitman Breed Abbott &amp; Morgan 500 West Putnam Avenue Greenwich, CT 06830 (203) 862-2458 <a href="mailto:amacleod@wbamct.com">amacleod@wbamct.com</a></p> <p>Kevin Flynn, Esq. Regulatory Counsel ISO New England Inc. One Sullivan Road Holyoke, MA 01040 (413) 535-4177 <a href="mailto:Kflynn@iso-ne.com">Kflynn@iso-ne.com</a></p>