



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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www.ct.gov/csc

March 2, 2016

TO: Parties and Intervenors

FROM: Melanie A. Bachman *MAB*
Acting Executive Director

RE: **DOCKET NO. 461** - Eversource Energy application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115-kilovolt (kV) bulk substation located at 290 Railroad Avenue, Greenwich, Connecticut, and two 115-kV underground transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements.

The Connecticut Siting Council (Council) is in receipt of correspondence from Attorney General George Jepsen dated February 29, 2016 concerning the above-referenced application.

MAB/RDM/cm

c: Council Members



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March 2, 2016

The Honorable George Jepsen
Attorney General
55 Elm Street
Hartford, CT 06141

RE: **DOCKET NO. 461** - Eversource Energy application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115-kilovolt (kV) bulk substation located at 290 Railroad Avenue, Greenwich, Connecticut, and two 115-kV underground transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements.

Dear Attorney General Jepsen:

The Connecticut Siting Council (Council) is in receipt of your correspondence dated February 29, 2016 concerning the above-referenced application. Thank you for taking the time to provide the Council with your comments.

Pursuant to Connecticut General Statutes §16-50(b), a copy of each application is to be submitted to the Attorney General's office for review. Before reaching a final decision on an application, the Council carefully considers all of the facts contained in the evidentiary record that is developed by the Council, the applicant, parties and intervenors in the proceeding and members of the public who speak at the public hearing or submit written statements to the Council.

Copies of your correspondence will be distributed to all participants in the proceeding and will be administratively noticed in the record. Please note that you can view all of the documents related to this proceeding on our website at www.ct.gov/csc under the "Pending Proceedings" link. You may also keep apprised of Council events on the website calendar and agenda.

Thank you for your interest and concern in this matter.

Very truly yours,

Melanie A. Bachman
Acting Executive Director

MAB/RDM/cm

c: Parties and Intervenors
Council members

GEORGE JEPSEN
ATTORNEY GENERAL

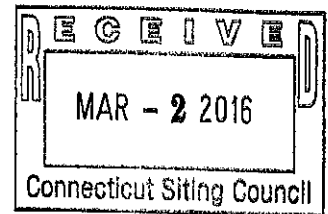


55 ELM STREET
P.O. BOX 120
HARTFORD, CT 06141-0120

Office of the Attorney General
State of Connecticut

February 29, 2016

Attorney Melanie Bachman
Acting Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051



ORIGINAL

Re: Docket No. 461 – Eversource Energy Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115-kilovolt (kV) bulk substation located at 290 Railroad Avenue, Greenwich, Connecticut, and two 115-kV underground transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements

Dear Attorney Bachman:

While most every application considered by the Connecticut Siting Council ("Council") presents difficult issues affecting local communities, not all directly impact Connecticut residents state-wide. The Application filed by Eversource Energy ("Eversource" or "Company") in the above-referenced proceeding directly affects both the town of Greenwich, Connecticut and electric ratepayers statewide. As the representative of the State and the people of the State of Connecticut, I find it appropriate that I share with the Council my concerns in this matter.

Having grown up in Greenwich (GHS Class of '72), I am intimately familiar with site proposed for the new Greenwich substation as well as the originally proposed preferred route of the 115 kV electric transmission lines through the gem that is Bruce Park. As Attorney General, I am equally familiar with both the necessity of a robust and reliable electric distribution system in the State as well as the significant impact that the high cost of electricity has on all of our State's electric consumers, residential, business and commercial/industrial alike. It is imperative that our electric distribution system be designed to meet our demonstrated needs in a prudent and cost-effective manner.

The new substation and associated transmission line project proposed in the Application raises a number of questions and concerns. First, there are significant questions concerning the need for a project of this magnitude as well as the Company's plan to address that need. As you

know, Eversource originally proposed to build a new 115-kV bulk substation at 290 Railroad Avenue in Greenwich and connect that substation to the existing Cos Cob substation with 2.3 miles of underground 115 kV transmission lines through Bruce Park. The cost of the project proposed in the Application was \$140 million, of which at least \$93 million would be borne by Connecticut customers state-wide.

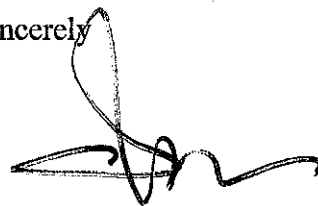
A number of participants in this case, including the Town of Greenwich and the Office of Consumer Council, have questioned the reliability of the Company's analysis and whether Eversource has demonstrated the need for an entirely new substation and transmission lines to serve Greenwich into the future. I respectfully urge the Council to consider the extent of the upgrades necessary to serve the town of Greenwich into the future and whether less invasive and less expensive alternatives could meet those needs. Solutions that exceed the demonstrated needs of the electric system unduly impact both the local community through the construction the infrastructure as well as Connecticut ratepayers who end up footing the bill.

In the past, the Council has directed the applicant to study the feasibility of alternative proposals and has scheduled additional proceedings to consider those findings. See CSC Docket No. 272. I respectfully suggest that the Council may wish to consider such an approach in this case to ensure that any solution in Greenwich is carefully designed to meet demonstrated needs.

If the Council determines that a new substation and new transmission lines are required, it should favor an alternative route along the Metro North Railroad that avoids Bruce Park altogether. The Council should also take steps to ensure that the design of any substation that must be built considers the input of the Town.

I fully appreciate the difficult task facing the Council in this and every case that it addresses and thank the Council for its consideration of these comments.

Sincerely



GEORGE JEPSEN
ATTORNEY GENERAL
55 Elm Street
Hartford, CT 06106

cc: Service List, Docket No. 461