To: State of CT Siting Council

From: Field Point Estate Townhouses (Intervenor)

Re: Docket No. 461

The following interrogatories from Field Point Estate Townhouses, a homeowners' association located in Greenwich CT, are directed to Eversource Energy.

1. According to my utility bill, the hottest summer billing month of 2105 was 0.1 of a degree hotter than the hottest summer billing month of 2013. Your company had predicted that a summer similar to 2013 would cause peak usage to be as high, if not higher, than 2013. Yet when comparing Greenwich's peak energy usage in 2015 to that of 2013, peak usage *dropped* from 130.5MVA (2013) to 114.8MVA (2015). *Please explain why peak usage actually dropped contrary to your prediction.*

2. Table 1 which pairs Greenwich Peak energy usage (MVA) and Average Temperatures for Hottest Billing Month does not seem to indicate a strong relationship between peak energy usage and temperatures. *Please explain why temperature and peak usage in Greenwich do not appear correlated.*

Table 1

Year	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Peak MVA	125	116.1	112.1	107.7	119.7	121.8	128.2	130.5	107.7	114.8
Avg Temp for Hottest Billing Month	Not available	74.3	76.0	72.7	77.6	77.4	76.6	76.2	73.8	76.6

3. Your company's energy projection of Greenwich summer peak usage (Table 2 sourced from Table E-1 from Connecticut Siting Council Application submitted June 2015) assumes that peak usage will rise and remain persistently above Cos Cob's 135MVA limit. Yet if we review Greenwich's peak energy usage history (Table 1), peak usage levels are hardly rising and are hardly persistent, where peak usage levels are succeeded by even higher peak levels. For example, 2015 peak usage is below 2006 and 2007 peak usage levels. 2007 is particularly interesting for the reason that temperatures were hotter in 2015 than in 2007, yet peak energy usage was a little less in 2015 than in 2007. *Please explain why Greenwich's projected energy usage will rise consistently as in your predictions (Table 2) rather than follow the seemingly random, historical patterns of the last 10 years (Table 1).*

Table 2 Summer Peak Load Levels
Cos Cob Substation 27.6 kV – Load in MVA

Year	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Total MVA	130.5	131.8	133.1	134.5	135.8	137.2	138.5	139.9	141.3	142.7	144.2

4. According to the Connecticut Economic Resource Center, Inc. (CERC), a nonprofit corporation and public-private partnership that provides economic development services that promote the state of CT's economic interests, Greenwich's population is not growing. (See Table 3.) *Why should we accept your company's 1% annual growth rate in energy usage which you admit is based on the growing cities of Stamford and Norwalk?*

Table 3: Town Population Estimates (Source: CERC.COM)

	Population				% Annual Change ('12-'20)
Town	**2000**	**2010**	**2012**	**2020 (Projected)**	
Greenwich	61,101	60,809	61,428	59,375	-0.4%
Norwalk	82,951	84,611	85,853	88,795	0.4%
Stamford	117,083	120,907	122,878	130,828	0.8%

5. What ad hoc solutions such as emergency generators can be brought to bear to meet peak demand?

6. What augmentations to existing infrastructure could provide a modest 10-20MVA increase to capacity to meet peak energy needs? Batteries? Microgrid for emergency services?

7. What conservation programs can be introduced to reduce energy usage during summer?

8. What conservation programs can be introduced to reduce the town's underlying energy usage, especially by type of customer, e.g., Bimbo Bakery, Town of Greenwich, retailers, residential users, etc.?

9. Given that peak energy usage spikes above 135MVA are likely to be sporadic rather than persistent as seen in Greenwich's historical peak energy usage, isn't it more fiscally prudent to service those peaks with ad hoc measures, e.g., emergency generators, rather than permanent substations where much of the substations' excess capacity will be unused?

10. Please explain the financial wisdom (from a rate payer's perspective) of removing 67.1MVA of capacity at Byram and Prospect St. substations when your company is concerned with Greenwich not having enough capacity to meet its peak energy needs?

11. Please confirm that your $140mm substation proposal would still be deemed an accurate, good faith estimate under ISO-NE PP4 if the substation were completed for an actual cost of $210 million.

12. In testimony, your company stated that there were three contingencies in July where you may have had to interrupt service to Greenwich customers. How did this occur when peak usage was no higher than 114.8MVA (much lower than the substation's rated 135MVA)? Are your existing equipment and transmission lines performing up to their rated specifications?

13. Please explain why accepting your substation proposal is a prudent choice for Greenwich residents and rate payers given (1) that peak energy usage spikes above 135MVA are likely to be sporadic rather than persistent and (2) that the proposal potentially introduces long-term environmental hazards to Greenwich, e.g., the bentonite slurry being released into Greenwich water ways and the Long Island Sound.