STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

RE: 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 115KV UNDERGROUND TRANSMISSION EXTENDING
APPROXIMATELY 2.3 MILES BETWEEN THE PROPOSED
SUBSTATION AND THE EXISTING COS COB
SUBSTATION, GREENWICH, CONNECTICUT, AND
RELATED SUBSTATION IMPROVEMENTS.

DOCKET NO. 461

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: AUGUST 18, 2015

INTERROGATORIES OF THE OFFICE OF CONSUMER COUNSEL

The following interrogatories from the Office of Consumer Counsel ("OCC") are directed to the Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P" or "Company"). Please contact the undersigned with any questions.

- OCC-1 Does the Greenwich Substation and Line Project ("Project") have approval from ISO-New England ("ISO-NE") and/or the Federal Energy Regulatory Authority ("FERC")? If so, provide copies of the approval notices. If not, explain why.
- OCC-2 Provide a detailed breakdown by FERC account of the estimated cost of the Project preparation and construction by year, and in total, from start to completion. Include an illustration of the Company's calculation of its weighted average cost of capital ("WACC"), and provide a narrative concerning the basis for provisions the Company has made for contingencies.
- OCC-3 Reference Application, pp. ES-4 and ES-11. Provide construction cost breakdowns and distances for the following portions of the proposed Preferred Route: each of the two portions underneath the Metro-North

Railroad and I-95; and the crossing beneath Bruce Park and its waterbodies. Also provide the cost of the proposed façade of the substation.

- OCC-4 Provide a detailed breakdown by FERC account of the estimated annual cost of the Project, including but not limited to, operations, maintenance, taxes, depreciation, amortization, and cost of capital.
- OCC-5 How does the Company propose to recover the cost of the Project? Identify who the Company proposes to charge, and the rate mechanism(s) the Company proposes to use.
- OCC-6 Does the Company propose to charge for the Project's construction work in progress ("CWIP")? If so, from which agency will the Company seek permission?
- OCC-7 Reference Application, p. E-5, Table E-1. Using the same categories for load and transformers, provide a revised Table E-1 with the following information added:
 - a. Actual peak usage numbers for 2004 through 2014.
 - b. If applicable, a revised 2015 peak usage estimate based on year-to-date actuals.
 - c. The actual annual average number of end-use customers served via the Cos Cob Substation ("Cos Cob") 27.6 kV load, by transformer number, for 2004 through 2014, and the estimated number of customers for 2015 through 2023.
 - d. An explanation of how the forecast of customers and peak usage was developed. Include a description of how the Company gathers data on potential new customers, and customers leaving the area.
 - e. A customer profile(s) for the 27.6 kV load. Include information on how the end use customers use the service, e.g., residential, retail, hedge fund

research, seasonal usage variations, etc., and the number of customers in each category.

- f. Total annual usage by transformer category.
- OCC-8 Provide a table with the same information as in OCC-5 above for the Cos Cob 13.2 kV load.
- OCC-9 Provide a detailed analysis on moving a portion of the Cos Cob 27.6 kV load to another substation. Individually analyze moves to the Waterside, the Southend and the Glenbrook substations. Include an analysis of the impact of each move on Cos Cob load capacity relief.
- OCC-10 For customers served by the Cos Cob 27.6 kV load, 13.2 kV load, and the Metro-North Railroad, specify the end user rate classes under which they are billed, and the actual revenues by rate class and billing category for 2010 through 2014.
- OCC-11 Specify the portion of the 27.6 kV Cos Cob load used to serve the western Greenwich area.
- OCC-12 Identify any customers in the Company's forecast, other than Metro-North Railroad, who will be taking transmission-level service out of the Cos Cob substation.
- OCC-13 List the 25 largest end-use customers served out of the 27.6 kV Cos Cob substation load in 2014 and forecast for 2015 through 2019, along with their anticipated loads. Identify any customers who have agreed to a minimum load.

- OCC-14 Explain, both in narrative form and quantitatively, how the Stamford Reliability Project (Connecticut Siting Council Docket 435), built in the Stamford-Greenwich Sub-area, improved service in Greenwich.
- OCC-15 How many bulk substations are there in the entire CL&P system? How many have three or more transformers serving 27.6 kV load?
- OCC-16 Provide a revised Application Figure E-3 that includes distances for each substation to the western Greenwich area, and distances between substations.
- OCC-17 Provide the numbers of customers served out of the Cos Cob substation load who fit in the following categories: enrolled in the ISO-NE demand response program; have installed combined heat and power systems; have at least part of their energy needs supplied by a fuel cell; have at least part of their energy needs supplied by a solar energy system.
- OCC-18 Provide two alternative analyses to serve at least a portion of the western

 Greenwich load, one for a fuel cell-powered microgrid, and one for a natural
 gas-fueled combined heat and power microgrid.

Respectfully submitted,

OFFICE OF CONSUMER COUNSEL ELIN SWANSON KATZ, CONSUMER COUNSEL

Bv

Margaret <mark>B</mark>ain

Associate Rate Specialist

I hereby certify that a copy of the foregoing has been mailed, electronically filed, and/or hand-delivered to all known parties and intervenors of record, this 18th day of August 2015.

Lauren H. Bidra

Commissioner of the Superior Court