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

: **DOCKET NO. 461**

: **NOVEMBER 4, 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. Please provide responses on or before November 17, 2015.

- OCC-29 Provide the peak MWh and MVA capacity of the above-captioned, proposed Greenwich transmission project ("Project"), and of the current system it would replace.
- OCC-30 Reference Response to CSC-12. Substantiate the one percent average annual load that the Company used for forecasting growth for the Project area.
 - a. List the areas covered by town and substation that are referenced in the CSC-12 response as "other substations in Greenwich" and the surrounding area ("Forecast Area").
 - b. Explain why the Company combined the Forecast Area's growth forecast with the Project area's forecast and used it to develop the Project area forecast.

- c. Compare and contrast the service profile of the Project area with the Forecast Area including but not limited to number of residential customers and commercial/industrial customers served in the Forecast Area.
- d. Provide the five-year total annual actual usage and the peak load in the Forecast Area vs. the Project area.
- OCC-31 Provide two types of forecasts annual usage forecast, and peak usage forecast for the area of Greenwich served by the proposed Project. Provide a table for each forecast type showing by year: actual usage for 2010 through 2014; for 2015, year-to-date actuals for the first three quarters plus the forecasted fourth quarter; and forecasts for 2016 through 2022. Explain the following in detail and show all calculations:
 - a. base starting point for the forecast;
 - b. how the forecast takes into account actual usage, and historical trending;
 - c. how the forecast incorporates conservation, load management, energy efficiency, and growth prospects for the proposed Project's service area;
 - d. the basis for, and application of, weather-normalization; and
 - e. actual and forecasted heating and cooling degree days by month by year.
- OCC-32 Reference Transcript of 10/06 at 22-23. Explain the dispatch protocol for substation incidents in Greenwich.
- OCC-33 How many gas-insulated switchgear (GIS) substations does the Company currently have in Greenwich? Provide detailed information, including potential risks, concerning the gas that will be used in the proposed GIS substation. Explain how the Company has notified and educated Greenwich emergency personnel on the properties of the gas and risks.

- OCC-34 Reference transcript of 10/06 at 33. Explain in detail the possibilities of partial solutions for added capacity at much lower cost, including but not limited to, these two scenarios:
 - a. a rebuild of the Prospect substation, and b) building at the current Cos
 Cob substation. For both scenarios, include an analysis of saving space
 with partial use of GIS.

Also include scenarios, that eliminate or mitigate horizontal directional drilling ("HDD") and the attendant large cost.

- OCC-35 Provide an accelerated time schedule for the time the Company would need to issue and analyze RFPs for non-transmission alternatives to provide at least a partial solution for capacity requirements.
- OCC-36 Reference Transcript of 10/06 at 95-96. Provide the minimum right of way and radius of clearance for a 115kV line for overhead and for trench construction. Also explain tree clearance standards, including whether there is a no-trees requirement, or certain tree height restrictions within the required radius.
- OCC-37 Reference Transcript of 10/06 at 97-98. Has the proposed HDD under the Metro North Railroad been approved by the Railroad? Would both the HDD and overhead construction require shutting down the railroad for a portion of time during construction?
- OCC-38 Reference Transcript of 10/06 at 112-115. Provide the Company's understanding of the legal status of the Siting Council's hypothetical approval of Project routing vis-à-vis hypothetical disapproval by the Town of Greenwich. Provide a copy of the documentation that the Company mentioned that it would like to submit (see Transcript at 115) regarding Kinsman Lane's status as a public or private road.

OCC-39 Reference Transcript of 10/06 at 116. When will the Company decide on the type of material (e.g., bentonite, etc.) it would use for HDD? List the types of drilling material the Company is considering for use. Provide the pros and cons of each type of material being considered including, but not limited to, cost and environmental impacts.

OCC-40 Provide the information requested on pp. 135, 148 of the 10/06 Transcript.

Respectfully submitted,

OFFICE OF CONSUMER COUNSEL ELIN SWANSON KATZ, CONSUMER COUNSEL

By: <u>II Moja N</u> Margaret Bain

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 4th day of November 2015.

Lauren H. Bidra

Commissioner of the Superior Court