## 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 LINES EXTENDING
APPROXIMATELY 2.3 MILES BETWEEN THE PROPOSED
SUBSTATION AND THE EXISTING COS COB
SUBSTATION, GREENWICH, CONNECTICUT, AND
RELATED SUBSTATION IMPROVEMENTS.

DECEMBER 22, 2015

## INTERROGATORIES OF THE OFFICE OF CONSUMER COUNSEL, SET FIVE

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. Per the Siting Council schedule, please provide responses on or before January 5, 2016.

- OCC-64 Reference Supplemental Direct Testimony of Kenneth Bowes, Raymond Gagnon and Jacqueline Gardell, dated September 29, 2015, which states on p. 6, that Greenwich is the third highest user in the Company's service territory. Provide a table listing 2014 annual usage information for: Greenwich, Stamford, Hartford, Waterbury, Danbury, New Britain, Norwalk, Bristol, Manchester, and West Hartford.
- OCC-65 Reference the Response to OCC-50. Provide a revised table with information added for: Cos Cob, Mianus and Tomac substations, and Greenwich Network.
- OCC-66 Reference Response to OCC-4. Regarding the annual revenue requirements associated with the proposed project, the Company lists the transmission estimate at \$18 million and the distribution estimate at \$3.6 million.
  - a. Is the Company estimating that CL&P ratepayers' share would be two-thirds of the \$18 million, equaling \$12.1 million, for transmission, and \$3.6 million for distribution? If not, then provide and explain the estimated annual revenue requirement for CL&P ratepayers.
  - b. Provide the CCF for transmission that is grossed up for federal and state income taxes.

c. Provide the estimated kWh rates for transmission and distribution for CL&P ratepayers by rate class. The revenue requirements should include all taxes, including grossed up requirements for all federal and state income taxes. Provide estimated total usage by rate class, and demonstrate how the rates cover the revenue requirement.

OCC-67 Reference Response to OCC-31, including attachment.

Based on the response, it appears that the Company's peak demand forecast for Cos Cob was calculated beginning with the actual peak demand for 2013, the highest peak demand of the six years (2011–2015) listed. The actual 2013 peak was then increased by a compounded 1% per year for the years 2014, 2015 and 2016 to derive a forecast of 134.4 MVA for 2016. The actual peaks for 2014 and 2015 were ignored. For the years 2017 through 2022, the Company continued to increase the peak demand forecast by a compounded 1% each year.

The response does not indicate that the forecast is based on normal weather or any analysis of cooling degree days, or any weather normalization calculations, or any specific look at energy efficiency measures in Greenwich, past, present or future.

Rather, the response states that the forecast is based on "the hot temperatures and high heat indices that occurred during the 2013 summer." The response also does not indicate that the compounded 1% increase per year forecast is based specifically on Cos Cob usage.

In light of the response to OCC-31:

a. Explain the following Company testimony from the October 6, 2015 hearing transcript ("Tr.") at 52 and 157:

MR. ASHTON: Okay. We talked a bit about the peak load at Cos Cob. I assume that's all weather normalized. Is that fair to say?

THE WITNESS (Bowes): Yes, it is.

MR. ASHTON: And what are the conditions on when you, quote, weather normalize?

THE WITNESS (Bowes): I don't know specifically. I know we use multiyear average, in this case a three-year average. (Tr. at 52)

## And

MR. ASHTON: I want to make sure we haven't got Russians numbers here. I asked you earlier about the 135.5 peak on Cos Cob in 2017. You answered that was weather, a weather normalized peak. Remember?

THE WITNESS (Bowes): Because it's forecasted, yes. (Tr. at 157)

- b. Explain how the Company's forecast basis relates to normal weather and to the Cos Cob peak demand. Provide the Company's definition of weather normalization.
- c. Explain the low usage numbers for the 2010 Annual Usage MWh.

OCC-68	Reference the response to OCC-32. Is there a standard for how far away from
	Greenwich the responder is who is dispatched to respond to substation incidents?
	Does the Company always have a responder within 15 minutes, 20 minutes, or
	some other arrival time to the Greenwich substation?

- OCC-69 Explain the Company's view on the pros and cons of high pressure gas-filled cable. Has the Company ever used this type of cable?
- OCC-70 What is the narrowest Metro North Railroad ("MNRR") right of way in which the Company has: distribution poles; other distribution infrastructure; transmission poles; other transmission infrastructure; and 115 kV transmission poles or infrastructure? What is the smallest radius of clearance in which the Company has the same categories of infrastructure within the MNRR? For each category, describe the infrastructure and the location.
- OCC-71 Reference response to OCC-53. Explain why the overhead route through the Greenwich Avenue historic district was deemed not viable.
- OCC-72 Reference response to OCC-61. The response is missing an answer to this piece of the interrogatory: "Explain in detail all assumptions on geologic conditions used in the estimates, and the basis for each such assumption." Provide the missing answer.

Respectfully submitted,

OFFICE OF CONSUMER COUNSEL ELIN SWANSON KATZ, CONSUMER COUNSEL

By: 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 22<sup>nd</sup> day of December 2015.

Lauren H. Bidra

Commissioner of the Superior Court