STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

RE: EVERSOURCE ENERGY APPLICATION FOR A : DOCKET NO. 461 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.

: **SEPTEMBER 21, 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 note that, pursuant to the Connecticut Siting Council schedule, the interrogatory responses are due on or before September 29, 2015.

- OCC-19 Re: Responses to Interrogatories CSC-11, OCC-1 and OCC-5.
 - (a) Re: Response to CSC-11. The response indicates that Connecticut would pay 64% of the Local Network Service ("LNS") costs. Provide an itemized list of the payers of the remaining 36% of the cost. Also, explain whether FERC or ISO-NE review and approve LNS tariff rates for the local service that would be provided through the proposed Greenwich line project.
 - (b) Re: Responses to CSC-11, OCC-1 and OCC-5. Does the Company have approval from FERC/ISO-NE for the \$12 million of Pool Transmission Facility ("PTF") costs that the Company proposes to recover through Regional Network Service ("RNS") rates? If so, provide a copy of the FERC/ISO-NE approval. If not, explain why. Also, provide the Company's view on localization of the costs, explaining why the Company believes that

- the costs will be regionalized and not localized, and include precedents for the Company view. Include a breakdown of the \$12 million cost by infrastructure element, cost and intended function.
- (c) Re: Response to CSC-11. Provide a breakdown of the \$21 million in distribution costs. Specify infrastructure elements, their costs and their intended functions.
- OCC-20 Re: Response to OCC-2. The response to OCC-2 is missing the requested "narrative concerning the basis for provisions the Company has made for contingencies." Please provide a list of all contingency factors/amounts and substantiate.
- OCC-21 Re: Response to OCC-4. Provide a detailed explanation of what is included in the 15% transmission carrying charge factor. Explain whether the referenced Attachment F of the ISO-NE Tariff applies to local transmission. Explain whether FERC or ISO-NE approve the NU local transmission revenue requirement. Provide documentation of any FERC/ISO-NE approvals.
- Provide an itemized breakdown of the 17% distribution revenue requirement factor.
- OCC-22 Re: Response to OCC-7. Items a. and b. The table appears to be missing years 2009 and 2015. Please provide a revised table that includes 2009 and 2015. Include actual 2015 peak numbers. Explain the causes of the drops in peak usage in 2007, 2008, and 2014.
- Item c. Is it correct that the Company's forecast bears no relation to any analysis or estimate of increases or decreases in numbers of customers?
- Item d. This item refers to the response to CSC-12. That response states, "the 1% load growth reflects the average load growth experienced at the Cos Cob substation transformers . . ." Elaborate on this response in light of the loads shown in OCC-7, item f.
- Item f. Explain the steep drops in usage in 2005, 2009 and 2010. In 2005, did transformers 1X and 2X have the same usage?

- OCC-23 Re: Response to OCC-8. What was the reason why the 35K-6X transformer was installed in 2013? Provide updated 2015 peak numbers.
- OCC-24 Re: Response to OCC-13. The Company objected to this interrogatory. OCC clarifies that it is not requesting the Company to publicly identify its customers and their loads. The customers may be identified as "customer 1" through "customer 25." This interrogatory is relevant to an analysis of non-transmission alternatives and energy supply alternatives or demand reduction that might apply for larger customers. With these conditions, the OCC posits this interrogatory: List the 25 largest end-use customers served out of the 27.6 kV Cos Cob substation in 2014 and 2015 to date, along with their actual 2014 and forecasted 2015 peak and total loads.
- OCC-25 Provide the number of customers served out of the Cos Cob Substation, broken down by residential, commercial and industrial, who have received *Energize CT* services, and categorize by type of service received.
- OCC-26 Provide the number of customers served out of the Cos Cob Substation, broken down by residential, commercial and industrial, that CL&P account executives have individually contacted to promote energy efficiency and demand reduction services.
- OCC-27 Provide an estimate of the energy savings from an intensive campaign promoting energy efficient lighting changeouts with 75% participation from customers served out of the Cos Cob Substation.
- OCC-28 Provide a detailed analysis of the efficiencies that could be realized from voltage/VAR optimization; battery energy storage; and working with customers to develop customized energy efficiency measures.

Respectfully submitted,

OFFICE OF CONSUMER COUNSEL ELIN SWANSON KATZ, CONSUMER COUNSEL

Margaret Rain

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 21st day of September 2015.

Lauren H. Bidra

Commissioner of the Superior Court