## 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.

DOCKET NO. 461

: MARCH 9, 2016

## MOTION OF THE OFFICE OF CONSUMER COUNSEL

The Office of Consumer Counsel ("OCC") is in receipt of the LF-20 revision dated March 7, 2016 ("Revised LF-20"), filed by The Connecticut Light and Power Company d/b/a Eversource Energy ("Company"). For the reasons explained in detail below, OCC requests that the Siting Council ("Council") reject the Company's Revised LF-20.

LF-20, dated February 16, 2016 ("Original LF-20"), includes the Company's response to a request to provide 2015 kWh <u>actuals</u> for the Cos Cob substation. Original LF-20 listed the <u>actual</u> annual kWh for the Cos Cob 27.6 kV transformers as 457,879,975. Revised LF-20 contains an <u>estimate</u>, not an actual, and lists the kWh usage for the same transformers for 2015 as 484,235,481, an increase of 26,355,506 kWh from Original LF-20.

In footnote c of Revised LF-20, the Company states that in preparing for the March 10, 2016 hearing, it realized that the usage for one of the three 27.6 kV transformers -- identified as the 11R-1X transformer -- was not recorded for the period of September 13 through November 1, 2015. The Company states that it estimated the 11R-1X usage for that period by using the average of 2013 and 2014 total usage for the three transformers, and

applying to that 2-year average, the average percentage of the total used by the 11R-1X transformer in 2013 and 2014. Then, the Company added the calculated estimate for usage for the 11R-1X to the actual usage for the other two transformers.

First, OCC objects to the Company's attempt to use 2013 and 2014 data -- i.e., the two-year usage average, and the 11R-1X transformer's average usage percentage of the 2013 and 2014 total usage -- in an estimate for 2015. In asking for the <u>actual</u> usage information requested in Original LF-20, OCC is seeking just that -- <u>actual</u> 2015 information. A 2015 estimate, especially one based on prior years' data, is not an appropriate or useful substitute for actual Cos Cob usage.

OCC notes that, in addition to an estimate being inappropriate and not useful, the Company did not disclose the numbers it used in estimating the 11R-1X transformer usage in Revised LF-20. The Company also did not disclose the actual 2015 usage for the other two Cos Cob substation 27.6 kV transformers.

Second, OCC objects to the Company's estimate on reasonableness grounds. OCC performed the following reasonableness check on the Company's estimate:

Revised LF-20 total 2015 kWh 484,235,481

Original LF-20 total 2015 kWh 457,879,975

Difference 26,355,506 additional kWh in Revised LF-20

Based on the Company's revised filing, it is OCC's understanding that the additional 26.36 million kWh (rounded) would be the Company's estimate of the allegedly missing 1.5 months of usage for the 11R-1X transformer. Since the period in question (September 13 – November 1) is not in the summer or winter peak periods, then it would be very conservative to use it as an average usage period to calculate the annual usage for the 11R-1X, but even so, it would yield the following:

Dividing the 26,355,506 additional kWh by 1.5 months yields:

17,570,337 average monthly usage.

Multiplying 17,570,337 times 12 months yields:

210,844,048 estimated annual 2015 usage for 11R-1X.

The above conservatively calculated usage of 210.8 million kWh (rounded) -derived based on the Company's revised total in Revised LF-20 -- would be more than
double the annual usage of 101.6 million (rounded) in 2013 (see Response to OCC-22) for
the 11R-1X and 1.8 times the usage of 116.9 million in 2014 (id.). The Company has
provided no explanation for such an outsized difference from 2013 and 2014 in the 2015
usage of this one transformer.

On the above grounds, the OCC objects to the Company's Revised LF-20, and requests that the Council reject the Revised LF-20.

Respectfully submitted,

OFFICE OF CONSUMER COUNSEL ELIN SWANSON KATZ, CONSUMER COUNSEL

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 9th day of March 2016.

Lauren H. Bidra

Commissioner of the Superior Court