



Company has the impetus on its own to seek out and share information on this potential alternative.

OCC went on to specify a sample information request and requested that the Council direct the Company to query the manufacturers and provide the information. OCC responds to the Company objections below.

The Company objects vehemently to providing the information. The objections include that the information is “not helpful or necessary” and is “unduly burdensome.” The Company does not specify why the information is “not helpful or necessary.” One of the key issues underlying the proposed project that the Company itself identifies is the alleged inability to fit larger capacity transformers in the Cos Cob substation. The requested information would provide expert, transparent analyses by knowledgeable third parties (i.e., the manufacturers) on this key issue. OCC believes the information would be both helpful and necessary, and does not view the Company’s objection as valid.

The Company also objects that OCC’s request is “unduly burdensome.” The Company has the detailed substation floor plans, knows the transformer it is inquiring about, and only needs to send a single letter or e-mail request to the manufacturers. OCC believes the request letter or e-mail to the manufacturers , with the floor plan attached, would take a minimal amount of time to prepare, and does not view this as a valid objection.

The Company states that it has evaluated adding larger transformers and concluded that there is insufficient space. The Motion would have the manufacturers -- who actually design, build and sell the transformers, and who likely have expert knowledge about transformer size and space requirements -- analyze the situation. The Objection does not state why the Company

would not want to have the manufacturers' analysis, and, in any case, does not cite any harm from having the manufacturers' analysis. The OCC does not view this as a valid objection.

Objection 1. b. states that providing more capacity would not resolve all the issues the Company identified. The OCC has not stated that it would, is not advocating that other issues be ignored, and believes that all issues should be considered.

Objection 2. states that the Motion is a “[t]hinly-veiled attempt to engineer and design Eversource’s electric system and to micro-manage Eversource’s due diligence . . .” OCC is not veiling anything, and is, in fact, seeking transparency and expertise on this issue that the Company has not fully explored on the record in this proceeding.<sup>1</sup> Clearly, what OCC is doing is asking questions and attempting to ensure that a major issue is fully vetted in the proposed \$140 million project that would be paid for mostly by CL&P ratepayers, and that would have a major impact on the citizens and Town of Greenwich. OCC is not attempting to engineer and design the electric system. OCC is certainly willing to discuss with the Company the specifications in the sample letter to the manufacturers. OCC’s Motion seeks expert information on a key issue that OCC believes should have been provided by the Company, but was not.

The Company complains that granting the Motion would cause needless delay. The Motion is in the nature of a late-file requesting more information, and OCC does not anticipate that there would be any significant delay in receiving the information from the manufacturers. Given the aforementioned financial burden contemplated by the project proposal, a short delay to consider a key issue is warranted.

---

<sup>1</sup> Regarding Mr. Bowes’s additional testimony of 01/05/2016 concerning the necessity of tap changers under load, the substation floor plan provided by the Company did not seem to OCC to indicate that there were tap changers in the current substation. However, as OCC mentions above, it is certainly open to discussion of the specifications in the letter to the manufacturers.

The Company's fourth area of complaint is that the Motion is based on an unsupported, unsworn belief of OCC. The Motion states that OCC believes that it may be possible. The Company does not state that it consulted with any transformer manufacturers. The major point on getting more information concerning the transformers is that this is a key issue in this docketed matter, and the Company has not provided expert information from the manufacturers.

Thus, the OCC views the Company's various objections as invalid and insubstantial. The record would clearly benefit from some additional technical sources of information.

The OCC respectfully requests that the Council grant OCC's Motion on the key issue of the manufacturers' analysis of larger capacity transformers at the Cos Cob substation.

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 11<sup>th</sup> day of January 2016.

---

Joseph A. Rosenthal  
Commissioner of the Superior Court