STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN 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 circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements.	: Docket # 461 : : : : : : : : May 6, 2016
Applicant	

INTERVENOR, PET PANTRY SUPER DISCOUNT STORES LLC'S

COMMENTS ON AND TO EXCEPTIONS CONNECTICUT SITING COUNCIL

DRAFT FINDINGS OF FACTS

The Intervenor, Pet Pantry Super Discount Stores LLC, submits the following comments on errors or inconsistencies that are contained in ad exceptions to the Siting Council's Draft Findings of Fact and referring to citations of the records which contradict such findings:

55 A contingency event, an event causing the loss of one or more system components, would require the remaining system components to carry higher loads, leading to potential system damage due to component overloads. The Greenwich electric system needs additional capacity to avoid overloads during contingency events. (Eversource 1, pp. E-1, E-7)

No showing that the Greenwich system needs additional capacity.

Error and Exception to finding see:

Cascading distribution failures are the underground that Eversource could not control (Tr. 7, p.77)

2015 was one of the warmest summers (Tr. 7, p. 45)

Lightning strikes which were the cause of the cascading failures (Eversource 1, E-10) could not have prevented and would have little impact (Tr. 7, p.74)

Converting the North Greenwich Substation to be fed by Cedar Heights would increase service to the Town of Greenwich by 75 megavolts (Tr. 5.p. 141)

Additional charts or tables showing usage and the like did not show any great increase in the use of its electrical services but a reduction over the last several years or at times a minimal increase. (See responses by Eversource to interrogatories OCC-30, Occ-46 and LF 020 submitted March 7, 2016)

There will be no effect if the Greenwich substation is out of service. (see Eversource's Response to interrogatory OCC-80 dated February 16, 2016)

The current facility at Prospect is still well under the load capacities. (see Eversource's response to interrogatory OCC-83 dated February 16, 2016)

There is a continuing decrease of use and loads over years. (see Eversource's Response to interrogatory OCC-46 through submission LF 20 and its response dated February5, 2016 vas to OCC-65)

Reliability is not necessarily improved as outages are not related to distribution but transmissions. (see Eversource's submission LF-024)

#56 Although the population of Greenwich has grown by 2700 person from 1990 (58,441 population) to 201 (61,171 population), electric demand increased by 45 percent. In the last few years, usage growth has been modest overall, fluctuating up and down. (Tr. 7, pp.140-141)

Usage was shown to have decreased

Error and Exception to finding see:

Tables showing usage and the like did not show any great increase in the use of its electrical services but a reduction over the last several years or at times a minimal increase. (See responses by Eversource to interrogatories OCC-30, Occ-46 and LF 020 submitted March 7, 2016)

#57 Greenwich customer usage, based on electric meter data, increased 1.5 percent from 2014 to 2015 (Tr. 3, pp.77; Tr. 4, pp. 47-49. Tr. 7 p.52)140-141)

Percentages are lower.

Error and Exception to finding see:

Tables showing usage and the like did not show any great increase in the use of its electrical services but a reduction over the last several years or at times a minimal increase. (See responses by Eversource to interrogatories OCC-30, Occ-46 and LF 020 submitted March 7, 2016)

#58 As of March 2016, Eversource was processing 115 applications for new or upgraded service in Greenwich. A majority of the service requests are related to reconstruction of existing residential homes where the new electric service is on par with what would be considered a medium sized commercial building in other areas of the state, (Tr. 3, p. 77; Tr. 4, pp.47-49; Tr. 7 p.52)

The area serviced is not that within the area proposed by Eversource to service the needs which would make the submission on any testimony unreliable and unsupported.

Error and Exception to finding see:

No empirical data submitted supporting such proposition.

Tables showing usage and the like did not show any great increase in the use of its electrical services but a reduction over the last several years or at times a minimal increase. (See responses by Eversource to interrogatories OCC-30, Occ-46 and LF 020 submitted March 7, 2016)

The applications for reconstructions are mainly in the Northwest Greenwich area (Tr. 6, p. 82)

#67 There are no additional cost-effective measures that could be undertaken to address both the reliability of the Greenwich distribution system and capacity issues at Cos Cob Substation (Tr. 4, pp.70-71)

No studies were undertaken, the finding is without support as to fact.

Error and Exception to finding: See

Cascading distribution failures are the underground that Eversource could not control (Tr. 7, p.77)

2015 was one of the warmest summers (Tr. 7, p. 45)

Lightning strikes which were the cause of the cascading failures (Eversource 1, E-10) could not have prevented and would have little impact (Tr. 7, p.74)

Converting the North Greenwich Substation to be fed by Cedar Heights would increase service to the Town of Greenwich by 75 megavolts (Tr. 5.p. 141)

Reserve capacities of the electrical systems are at least 15 percent (Tr. 7, p 45-46) in 2015

The proposed Greenwich Substation is strictly a distribution substation (Tr. 5, p138)

If there is any meaningful need increase in need at Cos Cob, the new substation is necessary (Tr. 5, pp. 69)

Eversource had no studies as to what is occurring with the energy alternatives except those in which it had participation. (Eversource's Response to interrogatory Pantry 02-21)

See also Town of Greenwich effort to implement effective alternatives

#71 The 2011 storm event demonstrated inadequate supply of power during contingency events, an unacceptable interruption of service (over 5,000 customer lost power) and cascading effects from the interruption in service, and the inability to recover from the interruption in a timely manner (75 minutes to 18 hours). (Eversource 44, R-24, Tr. 7, pp.132-133)

The storm event which gave rise to the Eversource Plan was a series of lightning strikes would could not have prevented the outages.

Error and Exception to finding see:

Lightning strikes which were the cause of the cascading failures (Eversource 1, E-10) could not have prevented and would have little impact (Tr 7., p.74)

#78 The 2013 peak occurred over a sustained period of high temperatures combined with high humidity. Summer peak demand declined from 130.5 MVA to 107.7 MVA in 2014 but increased to 114.8 MVA in 2015 MVA. In 2014 and 2015, although some periods were hot, the same type of prolonged heat wave did not occur, this lessening the summer peak demand for those years. (Eversource 25, p. 4; Tr. 3, p.153; Tr. 4, p. 40; Tr. 6, p.95)

There is no data submitted to determine the consistency of days above normal temperatures submitted. Testimony indicated that usage was actually decreased.

Error and Exception to finding see:

2015 was one of the warmest summers (Tr. 7, p. 45)

No data provided, no conclusion may be made.

Tables supplied shows usage and the like did not show any great increase in the use of its electrical services but a reduction over the last several years or at times a minimal increase. (See responses by Eversource to interrogatories OCC-30, Occ-46 and LF 020 submitted March 7, 2016)

#79 Summer peak demand is contingent on the weather, leading to year to year demand variations. In addition to the 17.5 percent decrease in demand from 2013 to 2014 at the Cos Cob Substation, the peak loads all across Connecticut dropped by approximately 14 percent, further indicating the lack of successive high heat index days that summer. Summer peak demads tends to occur during the third or fourth day of consecutive hot days, usually in the late afternoon. (Eversource 25, Tr. 3, pp. 62-65; Tr. 4, pp.40-41)

There is no data submitted to determine the consistency of days above normal temperatures submitted. Testimony indicated that usage was actually decreased. Assumptions are being made without empirical data.

Error and Exception to finding see:

2015 was one of the warmest summers (Tr. 7, p. 45)

Lightning strikes could not have prevented and would have little impact (Tr. 7, p.74)

No data provided, no conclusion may be made.

Tables supplied shows usage and the like did not show any great increase in the use of its electrical services but a reduction over the last several years or at times a minimal increase. (See

responses by Eversource to interrogatories OCC-30, Occ-46 and LF 020 submitted March 7, 2016)

#85 Overloads on the current systems could lead to loss of service to Greenwich customers through equipment failures or through targeted electric curtailments to protect system components. (Eversource 1, p. E-1)

Testimony was contradicted by Eversource not related to demonstrate the actual overload at the substation.

Error and Exception to finding see:

The proposed Greenwich Substation is strictly a distribution substation (Tr. 5, p138)

Reserve capacities of the electrical systems are at least 15 percent (Tr. 7, p 45-46) in 2015

Cascading distribution failures are the underground that Eversource could not control (Tr. 7, p.77)

Tables supplied shows usage and the like did not show any great increase in the use of its electrical services but a reduction over the last several years or at times a minimal increase. (See responses by Eversource to interrogatories OCC-30, Occ-46 and LF 020 submitted March 7, 2016)

The current facility at Prospect is still well under the load capacities. (see Eversource's Response to interrogatory OCC-83 dated February 16, 2016)

There is a continuing decrease of use and loads over years. (see Eversource's Response to interrogatory OCC-46 through submission LF 20 and its response dated February5, 2016 vas to OCC-65)

Reliability is not necessarily improved as outages are not related to distribution but transmissions. (see Eversource's submission LF-024)

#86 Under existing circumstances, with no increase in capacity, there is a possibility that there would be an overload at Cos Cob Substation. (Tr. 7, p.47)

Testimony contradicts such finding.

Error and Exception to finding see:

If there is any meaningful need increase in need at Cos Cob, the new substation is necessary (Tr. 5, pp. 69)

Converting the North Greenwich Substation to be fed by Cedar Heights would increase service to the Town of Greenwich by 75 megavolts (Tr. 5.p. 141)

Reserve capacities of the electrical systems are at least 15 percent (Tr. 7, p 45-46) in 2015

#91 A portion of one percent growth projection assumes a certain amount of distributed generation and a certain amount of energy efficiency. (Tr. 3, p.70)

The growth projections should be adjusted for use and need based upon trends of both the stagnant growth of the Town in population and buildings in the area sought to be serviced.

Error and Exception to finding see:

If there is any meaningful need increase in need at Cos Cob, the new substation is necessary (Tr. 5, pp. 69)

The proposed Greenwich Substation is strictly a distribution substation (Tr. 5, p138)

Converting the North Greenwich Substation to be fed by Cedar Heights would increase service to the Town of Greenwich by 75 megavolts (Tr. 5.p. 141)

No improvement to overhead distribution system through Greenwich (Tr. 7., p. 42)

Reserve capacities of the electrical systems are at least 15 percent (Tr. 7, p 45-46) in 2015

Cascading distribution failures are the underground that Eversource could not control (Tr. 7, p.77)

Additional charts or tables showing usage and the like did not show any great increase in the use of its electrical services but a reduction over the last several years or at times a minimal increase. (See responses by Eversource to interrogatories OCC-30, Occ-46 and LF 020 submitted March 7, 2016)

There will be no effect if the Greenwich substation is out of service. (see Eversource's Response to interrogatory OCC-80 dated February 16, 2016)

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Reliability is not necessarily improved as outages are not related to distribution but transmissions. (see Eversource's submission LF-024)

#99 Based on current and projected loads, the transformation capacity and distribution feeders are at or near maximum operational ratings under peak or near peak conditions. (Eversource 1, p. E-6)

No showing made.

Error and Exception to finding see:

If there is any meaningful need increase in need at Cos Cob, the new substation is necessary (Tr. 5, pp. 69)

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Reliability is not necessarily improved as outages are not related to distribution but transmissions. (see Eversource's submission LF-024)

#103 Reliability can be looked at in three parts- assuring adequate supply, frequency of interruptions; and duration of outages. The existing electric systems in the Town of Greenwich is unacceptable in all three aspects (Tr. 7, pp. 132-133)

Showing not made.

Error and Exception to finding see:

If there is any meaningful need increase in need at Cos Cob, the new substation is necessary (Tr. 5, pp. 69)

The proposed Greenwich Substation is strictly a distribution substation (Tr 5, p138)

Converting the North Greenwich Substation to be fed by Cedar Heights would increase service to the Town of Greenwich by 75 megavolts (Tr. 5.p. 141)

No improvement to overhead distribution system through Greenwich (Tr. 7., p. 42)

Reserve capacities of the electrical systems are at least 15 percent (Tr 7, p 45-46) in 2015

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#107 The new substation would extend transmission supply near the area of highest customer load allowing for a transfer of part of the load currently served by the Cos Cob Substation via 27.6kV distribution feeders (eversource9, pp.32-33)

Customer load higher near North Greenwich.

Error and Exception to finding see:

If there is any meaningful need increase in need at Cos Cob, the new substation is necessary. (Tr. 5, pp. 69)

The proposed Greenwich Substation is strictly a distribution substation (Tr 5, p138)

Converting the North Greenwich Substation to be fed by Cedar Heights would increase service to the Town of Greenwich by 75 megavolts (Tr. 5.p. 141)

No improvement to overhead distribution system through Greenwich (Tr. 7., p. 42)

Reserve capacities of the electrical systems are at least 15 percent (Tr 7, p 45-46) in 2015

Cascading distribution failures are the underground that Eversource could not control (Tr. 7, p.77)

#115. The proposed Substation is the only solution for backing up customers served by Cos Cob or the North Greenwich Substation. (Tr. 7, p.74-78)

Not only solution for an additional substation as the existing one still will be in service and the need has not been shown nor reliability improved. Improvements shown at the various substations would reduce or eliminate need.

Error and Exception to finding see:

If there is any meaningful need increase in need at Cos Cob, the new substation is necessary (Tr. 5, pp. 69)

The proposed Greenwich Substation is strictly a distribution substation (Tr 5, p138)

Converting the North Greenwich Substation to be fed by Cedar Heights would increase service to the Town of Greenwich by 75 megavolts (Tr. 5.p. 141)

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Reserve capacities of the electrical systems are at least 15 percent (Tr 7, p 45-46) in 2015

Cascading distribution failures are the underground that Eversource could not control (Tr. 7, p.77)

#122 The proposed project would enable the distribution system to back itself up between the North Greenwich Substation and Cos Cob Substation allowing Eversource to resupply those customers from the proposed Greenwich Substation. Additional reclosers and more effective sectionalization are part of Eversource Storm Hardening Program and would not be used as part of the substation upgrade to interconnect the substation, which is not technically " storm hardening" but would use the same methodology that would result in the same benefits. (Tr. 7, pp. 75-77)

No need for an additional substation as the existing one still will be in service and the need has not been shown nor reliability improved. Storm hardening would not have prevent outages due to lightning strikes, primary cause for the application.

Error and Exception to finding see (Tr 7 pp.36-38)

If there is any meaningful need increase in need at Cos Cob, the new substation is necessary (Tr. 5, pp. 69)

The proposed Greenwich Substation is strictly a distribution substation (Tr 5, p138)

Converting the North Greenwich Substation to be fed by Cedar Heights would increase service to the Town of Greenwich by 75 megavolts (Tr. 5.p. 141)

No improvement to overhead distribution system through Greenwich (Tr. 7., p. 42)

Reserve capacities of the electrical systems are at least 15 percent (Tr 7, p 45-46) in 2015

Cascading distribution failures are the underground that Eversource could not control (Tr. 7, p.77)

#168 Use of larger transformers at Cos Cob Substation would address only the issue of transformer overloads at Cos Cob Substation and not address the risk of potential distribution feeder overloads or potential transformer overloads at Prospect Substation. (Eversource 39, p. 4; Tr. 7 pp.93-94)

No need for an additional substation as the existing one still will be in service and the need has not been shown nor reliability improved. Storm hardening would not have prevent outages due to lightning strikes, primary cause for the application.

Error and Exception to finding see:

If there is any meaningful need increase in need at Cos Cob, the new substation is necessary (Tr. 5, pp. 69)

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No improvement to overhead distribution system through Greenwich (Tr. 7., p. 42)

Reserve capacities of the electrical systems are at least 15 percent (Tr 7, p 45-46) in 2015

Cascading distribution failures are the underground that Eversource could not control (Tr. 7, p.77)

Respectfully Submitted,

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PET PANTRY SUPER DISCOUNT STORES LLC Intervenor

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CERTIFICATION

I hereby certify that on May 6, 2016, a copy of the foregoing POST HEARING BRIEF was filed by Pet Pantry Super Discount Stores LLC to Eversource Energy electronically and the original and 15 copies was served to all known parties, applicant and intervenors to: by U.S. Mail first class postage prepaid and by electronic mailing to:

The Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
Sitingcouncil@po.state.ct.us

See Attached Service List

Pet Pantry Super Discount Stores LLC Intervenor

By *s/Mark L. Bergamo*
Mark L. Bergamo
Comissioner of the Superior Court

LIST OF PARTIES AND INTERVENORS
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Party Approved on January 12, 2016	☒ E-Mail	The Honorable Peter J. Tesei First Selectman Town of Greenwich 101 Field Point Road Greenwich, CT 06830 ptesei@greenwichct.org	Julie D. Kohler, Esq. David A. Ball, Esq. Cohen and Wolf, P.C. P.O. Box 1821 Bridgeport, CT 06601 jkohler@cohenandwolf.com dball@cohenandwolf.com