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October 4, 2017

Melanie Bachman  
Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain CT 06051

Attention: Ms. Bachman

**Re: Brief and Proposed Findings of Fact**

Enclosed are an original and 15 copies of my October 4, 2017 submission to the Siting Council.

Sincerely,

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Attention: Ms. Bachman and members of the Siting Council

**Re: Docket 461A Brief and Proposed Findings of Fact**

I have been granted intervenor status in the above-referenced matter. I am urging the CT Siting Council to deny Eversource Energy's application for a Certificate of Environmental Compatibility and Public Need to build a substation at Railroad Avenue in Greenwich, CT together with related transmission circuits between the proposed substation and the existing Cos Cob substation in Greenwich, CT.

My urging for denial is based upon several factors: Public Opposition; Absence of Need: no Load Growth; Adverse Effect on the state from the Related Rate Increase; Failure to Proactively Explore Inexpensive and Clean Alternatives; and, The Real Motive.

**Public Opposition:**

Eversource has proceeded to try to force this project onto the Town of Greenwich, in the face of opposition from the Town, one of its largest customers in Greenwich.

In response to Siting Council member Dr. Klemens' question of all four witnesses representing the Town Departments, "Do you believe this project is needed for the Town of Greenwich as proposed, yes or no?", all four answered in the negative. (461A-20170829 p 278-9) These are dedicated public servants. We in Greenwich are fortunate to have them. At least one was complimented publicly by the Siting Council Chairman.

After all the hearings, meetings, testimony and information, the Town is still not in favor of the project. For Eversource to proceed is tantamount to implying that these same dedicated public servants are willing to risk having its citizens face a future of brownouts and blackouts. Such a conclusion makes absolutely no sense.

Other than Eversource, not one speaker: at the Greenwich July 13 2017 Public Hearing; party or intervenor at all the subsequent New Britain hearings, has spoken in favor of the project. Not one.

### **Absence of Need: No Load Growth:**

One of the primary reasons behind the application – load growth – does not exist. The Town of Greenwich is experiencing static to declining demand. Eversource’s own testimony: “The load growth is no longer a concern.” (461A-20170829 p.23)

### **Adverse Effect on the State from the related Rate Increase:**

This project would allow Eversource to obtain a rate increase. This will adversely affect both the experience of residents, and the perceptions of others, of the State of Connecticut, at a time when the State is already losing population, companies, and jobs.

### **Failure to Proactively Explore Inexpensive and Clean Alternatives:**

Example #1: according to testimony many existing underground cables in Greenwich are old and inefficient. Cables can be replaced by more modern higher rated cables in the same duct. Yet Eversource has no plan to take advantage of this low cost minimally disruptive potential improvement: “MR. BALL: You are not proposing, as you sit here today, to replace cables that simply may not be functioning the way they should, that is not your proposal? THE WITNESS (Bowes): That is correct.” (461A 20170829 p. 61)

Example #2: In their 2016 Annual Report Eversource’s President calls the company “...*THE* catalyst for change and opportunity in New England” (emphasis mine). He opened the door for comparisons I have made with Vermont’s Green Mountain Power (GMP): a New England company “...trying to turn homes, neighborhoods and towns into virtual power plants, driven by economics as well as environmental goals”; “...lead[ing] the transformation of an electric system that depends on power sent along big transmission lines ‘to a community- home- and business-based energy system....’” (Stacy 8/31/17 email attachment: NY Times Article July 29, 2017 excerpts; and 461A 20170905 p. 29)

I made Eversource aware of a distributed energy storage possibility – Tesla Powerwalls – on several occasions. The utility did not investigate and therefore has no idea of the real (vs. hypothetical) costs and benefits of this or other related alternatives.

A distributed battery system could not only further mitigate peak demand in the system. Those who install this system would have 8-12 hours of whole house backup. Eversource agreed such an installed system would have avoided interruption during the majority of recent power failures experienced in the Town. (461A 20170905 p. 21)

When asked about such a system for Greenwich, they responded, “Eversource is not allowed to do that in the State of Connecticut.” (461A 20170905 p. 24) The utility had done no serious investigation into the subject with Green Mountain Power, the Vermont utility which has contracted with Tesla to provide Powerwalls, or with Tesla.

Eversource has not proactively contacted Tesla even just for information, in spite of my several recommendations to do so, where I included both a name and contact information. Their response: “We typically do not reach out to a single employee at a single company for information purposes.” (461A 20170905 p. 17) Where is there proactive solution-seeking by the company which calls itself “the catalyst for change and opportunity in New England?”

Eversource hid behind the statement, “As a public utility in the State of Connecticut, we use a procurement process approved by PURA that doesn't solicit input from a single vendor, but from multiple vendors” (461A 20170905 p. 16), as though such a process would prevent them taking initiative.

When asked whether Eversource is fulfilling this bold statement by its President, Eversource defended that statement and their initiatives, including the following: “Where the rules don't presently exist, we work with the policymakers to write new rules that will, again, enable clean energy.” (461A 20170905 p 32) Where is there evidence of Eversource proactively learning about what is going on in neighboring Vermont (or elsewhere), and then working with policymakers to allow the utility to replicate what they presume is happening with distributed storage in the State of Vermont?

Green Mountain Power is a “B” Corporation. (461A 20170905 p. 27) In advance of my cross examination Eversource’s Witness had access to this same NY Times article in which this fact was disclosed. Yet he did not know what a B corporation is or if Eversource is or is not one. (461A 20170905 p. 28) "B Corps are for-profit companies certified by the nonprofit B Lab to meet rigorous standards of social and environmental performance, accountability, and transparency." (ibid.) Who is the catalyst for change and opportunity in New England?

### **The Real Motive:**

At the July 13, 2017 Public Hearing Peter Malkin made a Public Statement which included the following remarks: “...even though Eversource cannot establish the need for the massive transmission solution, it is motivated to build a new transmission line and substation so that it will profit, because it will have the opportunity to recover the capital cost plus a fixed return. It will be able to borrow money at perhaps 3 or 4 percent and is permitted a return of 10 or 12 percent. So there's an arbitrage even if this serves no purpose whatsoever. Eversource will make a lot of money on this transaction.” (461A 21070713 evening public session p. 27)

In their 2016 Annual Report Eversource reported a decline in revenues of over \$3 million. There is no alternative explanation for Eversource’s fixation on this project in the face of public opposition, lack of load growth, adverse effect on the State, and the failure to proactively explore inexpensive and clean alternatives. One can only conclude that Mr. Malkin is right.

I sincerely hope that in 5 years’ time we will all look back and thank the Siting Council for helping us avoid what we otherwise would have seen as a worse than useless project, and at the same time for helping redirect Eversource’s efforts toward “...lead[ing] the transformation of an electric system that depends on power sent along big transmission lines ‘to a community- home- and business-based energy system...’” as already envisioned by Green Mountain Power. (Stacy 8/31/17 email attachment: NY Times Article July 29, 2017 excerpts; and 461A 20170905 p. 29)

Deny Eversource’s application 461A.

Sincerely,

Parker Stacy  
Intervenor