

BEFORE THE CONNECTICUT SITING COUNCIL

In re: NTE Connecticut, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 550-megawatt dual-fuel combined cycle electric generating facility and associated electrical interconnection switchyard located at 180 and 189 Lake Road, Killingly, Connecticut

Docket No. 470B

Filed: April 11, 2019

PRE-HEARING SUBMISSION OF CONNECTICUT FUND FOR THE ENVIRONMENT,
NOT ANOTHER POWER PLANT, SIERRA CLUB, AND WYNDHAM LAND TRUST

Connecticut Fund for the Environment, Not Another Power Plant, Sierra Club, and Wyndham Land Trust respectfully provide the following pre-hearing information available at this time in the above-captioned proceeding.

A. Administrative Notice

1. ISO NE, Final Draft 2019 CELT ISO-NE and States Annual Energy and Seasonal Peak Forecasts, March 29, 2019. Available at https://www.iso-ne.com/static-assets/documents/2019/03/lfc_29mar2019_final.pdf.
2. ISO NE, Draft 2019 Solar Photovoltaic (PV) Forecast, February 15, 2019. Available at https://www.iso-ne.com/static-assets/documents/2019/02/draft_2019_forecast_final.021519.pdf.
3. ISO NE, Draft 2019 Energy Efficiency Forecast, February 8, 2019. Available at https://www.iso-ne.com/static-assets/documents/2019/02/eef2019_draftforecast_final.pdf.
4. ISO NE, Forward Capacity Auction Obligations, FCA 13. Available at <https://www.iso-ne.com/isoexpress/web/reports/auctions/-/tree/fca-results>.

5. ISO New England, Draft 2017 ISO New England Electric Generator Air Emissions Report, January 2019. Available at https://www.iso-ne.com/static-assets/documents/2019/01/DRAFT_2017_emissions_report_20190122.docx.
6. ISO New England Operational and Market Update, December 2017 - January 2018 Cold Weather Conditions, Compiled by ISO New England, External Affairs, January 12, 2018. Available at https://www.iso-ne.com/static-assets/documents/2018/01/december_2017_january_2018_cold_weather_operating_conditions_summary_january_12_2018_final.pdf.
7. Massachusetts Dept. of Energy Resources, Ltr. re Petitions for Approval of Proposed Long-Term Contracts for Offshore Wind Energy Pursuant to Section 83C of Chapter 188 of the Acts of 2016, DPU 18-76, 18-77, 18-78, August 1, 2018. Available at <https://macleanenergy.files.wordpress.com/2018/08/doer-83c-filing-letter-dpu-18-76-18-77-18-78august-1-2018.pdf>.
8. Lawrence Berkeley National Laboratory, Utility Scale Solar: Empirical Trends in Project Technology, Cost, Performance, and PPA Pricing in the United States – 2018 Edition. September 2018. Available at https://emp.lbl.gov/sites/default/files/lbnl_utility_scale_solar_2018_edition_report.pdf.
9. Lazard Levelized Cost of Storage Analysis, Version 4.0, December 2018.
10. Massachusetts Dept. of Energy Resources. Ltr. re Petitions for Approval of Proposed Long-Term Contracts for Renewable Resources Pursuant to Section 83D of Chapter 188 of the Acts of 2016, DPU 18-64, 18-65, 18-66, July 23, 2018. Available at

<https://macleanenergy.files.wordpress.com/2018/07/doer-83d-filing-letter-dpu-18-64-18-65-18-66july-23-2018.pdf>.

11. Petition of NSTAR Electric Company d/b/a Eversource Energy for Approval of Proposed D.P.U. 18-64 Long Term Contracts for Clean Energy Projects Pursuant to Section 83D of An Act Relative to Green Communities, St. 2008, c. 169, as amended by St. 2016, c. 188, § 12, DPU 18-64, et al., Application Joint Testimony of Waltman/Brennan/Furino D.P.U. 18-64/D.P.U. 18-65/ D.P.U. 18-66, July 23, 2018.
Available at
<https://eeaonline.eea.state.ma.us/EEA/FileService/FileService.Api/file/FileRoom/9636755>.
12. ISO New England, 2015 Economic Study—Evaluation of Offshore Wind Deployment, September 2, 2016, available at https://www.iso-ne.com/static-assets/documents/2016/09/2015_economic_study_offshore_wind_development_final.docx.
13. Rhode Island Office of the Governor, Press Release, May 23, 2018, available at <https://www.ri.gov/press/view/33287>.
14. Connecticut Governor’s office and CT DEEP press release, June 13, 2018, available at <https://www.ct.gov/deep/cwp/view.asp?A=4965&Q=603300>.
15. Massachusetts Dept. of Energy Resources, Energy Storage Target, available at <https://www.mass.gov/service-details/energy-storage-target>.
16. Federal Energy Regulatory Commission, Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System

- Operators, 162 FERC ¶ 61,127, Dkt. Nos. RM16-23-000, AD16-20-000, Order No. 841, available at <https://www.ferc.gov/whats-new/comm-meet/2018/021518/E-1.pdf>.
17. ISO New England, Revisions to ISO New England Inc. Transmission Markets and Services Tariff in Compliance with FERC Order 841, Dkt. No. ER19-470-000, December 3, 2018, available at https://www.iso-ne.com/static-assets/documents/2018/12/rev_in_compliance_with_order_841.pdf.
 18. ISO New England, FERC Order No. 841 Compliance: Electric Storage Participation in Markets, August 14-15, 2018, available at https://www.iso-ne.com/static-assets/documents/2018/08/a7_presentation_order_841_compliance.pptx.
 19. ISO New England, Generator Interconnection Queue (Public), available at <https://irtt.iso-ne.com/reports/external>.
 20. Utility Dive, New York Gov Cuomo moves to double solar, triple offshore wind capacity targets, January 16, 2019, available at <https://www.utilitydive.com/news/new-york-gov-cuomo-moves-to-double-solar-triple-offshore-wind-capacity-tar/546179/>.
 21. ISO New England, Net Energy and Peak Load by Source for 2018, at https://www.iso-ne.com/static-assets/documents/2018/02/2018_energy_peak_by_source.xlsx.
 22. Andrew M. Cuomo, 2019 State of the State Book: Justice Agenda, The Time Is Now, January 2019, available at <https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/2019StateoftheStateBook.pdf>.

23. ISO New England, Energy Security Improvements: ISO Discussion Paper April 2019 – Version 1, April 1, 2019, available at https://www.iso-ne.com/static-assets/documents/2019/04/a00_iso_discussion_paper_energy_security_improvements.pdf.
24. ISO New England, Operational Fuel-Security Analysis, January 17, 2018, available at https://www.iso-ne.com/static-assets/documents/2018/01/20180117_operational_fuel-security_analysis.pdf.
25. Paul J. Hibbard & Craig P. Aubuchon, Power System Reliability in New England :Meeting Electric Resource Needs in an Era of Growing Dependence on Natural Gas, November 2015, available at <https://www.mass.gov/files/documents/2016/11/pe/reros-study-final.pdf>.
26. ISO New England, Compliance Filing to Establish a Fuel Security Reliability Standard, Short-Term Cost-of-Service Mechanism, and Related Cost Allocation for Out-of-Market Compensation in Docket No. EL18-182-000, and Docket No. ER18-____-000. August 31, 2018. https://www.iso-ne.com/static-assets/documents/2018/08/fuel_security_compliance_filing.pdf.
27. ISO New England, Memo: Responses to Questions relative to Energy Security Proposal, Revised March 21, 2019, available at https://www.iso-ne.com/static-assets/documents/2019/01/a7_iso_memo_containing_responses_to_joint_requestors_questions_on_energy_security_proposal.pdf.

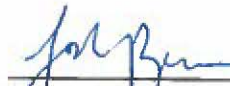
B. Exhibits to be Offered

1. Direct Joint Testimony of Robert Fagan and Devi Glick, Synapse Energy Economics, on behalf of Not Another Power Plant and Sierra Club.

C. List of Witnesses

1. Robert M. Fagan, Vice President, Synapse Energy Economics, 485 Massachusetts Ave., Suite 2, Cambridge MA 02139.
2. Devi Glick, Senior Associate, Synapse Energy Economics, 485 Massachusetts Ave., Suite 2, Cambridge MA 02139.

RESPECTFULLY SUBMITTED this 11th day of April, 2019.



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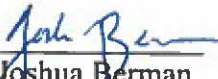
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I HEREBY CERTIFY that a copy of the foregoing document was electronically mailed to the following service list on April 11, 2019:

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This 11th day of April, 2019.


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