



("Project" or "Proposed Project"), filed by The Connecticut Light and Power Company d/b/a Eversource Energy ("Company") on June 26, 2015 ("Application" or "App.").<sup>1</sup>

1. At the Public Comment Session held in Greenwich on September 1, 2015, two speakers commented on a recent fire at Cos Cob ("Cos Cob fire"). (Transcript of the Proceeding ("Tr.") 9/01/15, Public Comment Session, Fred Canillo at 24, and Thila Agthe at 49)
2. The Company trains firefighters that, in case of a substation fire, they are to wait for access to the substation to be provided by the responding Company employee. (Tr. 10/06/15 at 22-23)
3. The Company employee who responded to the Cos Cob fire was dispatched to Greenwich from Milford. (Tr. 10/06/15 at 25)
4. The Cos Cob fire burned for three hours. (Response to Pantry-02, Q-002)
5. An adjacent neighbor of the proposed Greenwich is Airgas, Inc. ("Airgas"). (Tr. 3/10/16 at 33-34)
6. Photographs taken outside of the premises of Airgas, Inc., 255 Field Point Road, Greenwich, show canisters labeled as oxygen, and a posted sign that reads: "DANGER, No smoking or open flame in this area." (Field Point Estate Townhouses, 3/01/16 Motion for Administrative Notice, Photographs 1 & 2; Motion Granted 3/10/16)
7. Cos Cob's 13.2kV transformer service provides reliable service now and for the foreseeable future, and therefore "no improvements at Cos Cob Substation at the 13.2-kV level are recommended or included in the Project." (App. at E-3, note 6)
8. The Company proposes to remove the existing 27.6- to 13.2-kV transformers at Byram and Prospect Substations (Response to OCC-81) and transfer their load to "new 115- to 13.2-kV transformers at Greenwich Substation." (App. at E-5)
9. The Company calculates substation load ratings based on one transformer being out of service. (App. at E-17)

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<sup>1</sup> Please note that the permissible and short-term transformer load ratings mentioned herein account for having one transformer -- out of two in Byram, three in Cos Cob, or four transformers in Prospect -- that is out of service.

10. Based on one transformer being out of service, the Byram load that would be transferred to Greenwich Substation would be 12.5 MVA permissible load rating (16 short-term rating), and the Prospect load would be 40 MVA permissible load rating (51 short-term rating). (App. at E-14, Table E-3)
11. The Company plans to keep the current Prospect Substation in service during and after the Project construction. (App. at H-8)
12. The Company plans to transfer about half, described as 70.5 MVA (App. at E-1) or “about 70 MVA,” of Cos Cob’s existing 115-to 27.6-kV transformer load to the Greenwich Substation. (Responses to OCC-78 & OCC-80)
13. The Proposed Substation would be able to accommodate a permissible load of 134 MVA, and a short-term load of 144 MVA. (Response to OCC-83, Attachment, p. 1)
14. The Company has no plans currently for a third transmission line into Greenwich. (Tr. 12/1/15 at 146)
15. The Company proposed an interconnection for a third transmission line with one end at the Greenwich Substation. There have been no discussions and there is no plan concerning where the substation would be for the other end of the line. (Tr. 12/1/15 at 146)
16. The Company’s plan for a six-breaker ring and GIS technology at the Greenwich Substation are provisions for a third transmission line that might ultimately be constructed. (Tr. 10/06/15 at 143)
17. Cos Cob is the bulk substation that feeds the majority of the load in Greenwich. (App. at E-2)
18. The Proposed Project requires expansion of Cos Cob. “The Cos Cob Substation fence will be partially extended approximately 140 feet to the south to accommodate the new equipment.” (App. at ES-3)
19. The Company did not provide any detail on what it may have done as far as exploring the option of expanding Cos Cob into a portion of adjacent Cos Cob Park land.
20. North Greenwich Substation is fed from Cos Cob. (App. at E-3)
21. Cedar Heights Substation currently has 15 MW of capacity that it could share with North Greenwich. (Late-Filed Exhibit (“LF”)-011)
22. The Company peak loads forecasts for Cos Cob and other Greenwich substations are derived by using the 2013 actual peak demand load for each substation as the

starting point and applying 1% compounded annual load growth for the subsequent years after 2013. (Response to CSC-12)

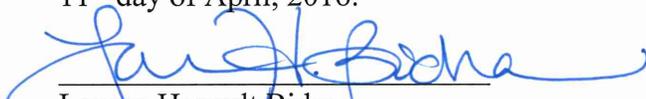
Respectfully submitted,

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I hereby certify that a copy of the foregoing has been mailed, electronically sent and/or hand-delivered to all known parties and intervenors of record this 11<sup>th</sup> day of April, 2016.

  
Lauren Henault Bidra  
Commissioner of the Superior Court