



STATE OF CONNECTICUT

OFFICE OF CONSUMER COUNSEL

Ten Franklin Square
New Britain, Connecticut 06051

TELEPHONE
(860) 827-2900
Voice & TDD

FAX
(860) 827-2929

Bruce C. Johnson
Direct Dial (860) 827-2904
Email : bruce.johnson@ct.gov

February 20, 2009

S. Derek Phelps
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: The Connecticut Light and Power Company Application for Certificates of Environmental Compatibility and Public Need for the Connecticut Valley Electric Transmission Reliability Projects Which Consist of (1) The Connecticut Portion of the Greater Springfield Reliability Project that Traverses the Municipalities of Bloomfield, East Granby, and Suffield, or Potentially Including an Alternative Portion that Traverses the Municipalities of Suffield and Enfield, Terminating at the North Bloomfield Substation; and (2) the Manchester Substation to Meekville Junction Circuit Separation Project in Manchester, Connecticut
DOCKET No. 370

Dear Mr. Phelps:

The Office of Consumer Counsel ("OCC") is a party to the above-captioned docket. OCC is in receipt of a copy of a Notice issued by the Connecticut Siting Council (the "Siting Council" or "Council") on February 2, 2009, seeking comments on a letter which GE Energy Financial Services ("GE EFS") filed in this docket. OCC herewith responds to this Siting Council request.

OCC has the following comments on the GE EFS Letter.

The CEAB RFP process is designed to encourage competing solutions for given energy project proposals. CEAB's 2/17/09 report to the Siting Council states that Towantic merits consideration as such. GE EFS offers to provide, in this docket, such information about Towantic as the Council requests.

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This offer is helpful, and the Council should accept it. However, the Council also should require GE EFS to respond to information requests from any docket participant (subject to normal evidentiary considerations, such as relevancy). If GE EFS is involved in the present docket, application of the UAPA due process standards requires no less.

GE EFS, noting that Towantic already has a Siting Council certificate in hand, observes that "no efficiency" would be gained by beginning a second application process for Towantic at this time. This probably is correct. However, GE EFS goes on to ask the Council not to re-open Docket No. 192. Seemingly, the company wants that earlier docket left alone no matter what develops in this present docket.

This request should be denied without prejudice, as premature. At present, it is not clear whether Towantic should be considered a viable alternative to [part or all of] the CL&P project --- that is, the main proposal before the Council in this docket. Until the present docket proceeds further, and more information and evidence is placed on the record, it will not become clear whether or not Docket No. 192 might need to be re-opened. The Council can assure GE EFS that any future request concerning the status of Docket No. 192 will be given full consideration.

Very truly yours,

MARY J. HEALEY
CONSUMER COUNSEL

By 
Bruce C. Johnson
Principal Attorney

cc: Service List