

STATE OF CONNECTICUT, OFFICE OF CONSUMER COUNSEL
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STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

RE: THE CONNECTICUT LIGHT AND POWER : DOCKET NO. 370A
COMPANY APPLICATION FOR CERTIFICATES (Consolidated Docket)
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 ALTERNATE :
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. : APRIL 2, 2009

RE: NRG ENERGY, INC. APPLICATION DOCKET NO. 370B
PURSUANT TO CGS § 16-50I(a)(3) FOR (Consolidated Docket)
CONSIDERATION OF A 530 MW COMBINED
CYCLE GENERATING PLANT IN MERIDEN,
CONNECTICUT. APRIL 2, 2009

OFFICE OF CONSUMER COUNSEL'S
FIRST SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC"), a party to this Connecticut Siting Council ("CSC") proceeding, requests responses to the attached questions by **April 16, 2009**. If there are objections to any questions, or if providing responses to certain

questions would be unduly burdensome, please contact the undersigned as soon as possible.

Questions OCC-1 through OCC-14 below, inclusive, are directed to The Connecticut Light and Power Company ("CL&P").

Questions OCC-15 through OCC-18 below, inclusive, are directed to ISO New England, Inc. ("ISO-NE").

Questions OCC-19 through OCC-20 below, inclusive, are directed to the Connecticut Energy Advisory Board ("CEAB").

Questions OCC-21 through OCC-26 below, inclusive, are directed to NRG Energy, Inc. ("NRG").

- OCC-1 Since filing its Application, has CL&P become aware of any statements in that Application that require correction or clarification?
- (a) If so, please provide such corrections/clarifications.
 - (b) Please treat this interrogatory as a continuing request, which CL&P should update periodically as appropriate.
- OCC-2 The Application (p. ES-18) states that, if the Southern Route Alternative (to GSRP), an alternative which CL&P apparently does not favor, is certificated by the Massachusetts Energy Facilities Siting Board, some 5.4 miles thereof would be located in Connecticut.
- (a) Does CL&P believe that this 5.4 mile section must be reviewed by the CSC in this docket, regardless of actions by the Mass EFSB, or that such Connecticut review would be needed only if the Mass EFSB rejects GSRP in favor of the Southern Route Alternative?
 - (b) Please treat this interrogatory as a continuing request, which CL&P should update periodically as appropriate.
- OCC-3 Reference the Application, p. ES-31, which estimates the initial capital cost for GSRP and MMP as \$728 Million (714 + 14), and that for the Connecticut portion as \$147 Million (133 + 14).
- (a) Does CL&P still believe these dollar totals are accurate? If not, please provide updated figures as appropriate.
 - (b) Please provide an estimate of the counterpart life cycle costs (both nominal and present-valued) for GSRP and MMP, and the

Connecticut portion thereof, computed using CSC's guidelines for such calculations.

- OCC-4 According to a summary posted on the Edison Electric Institute website, the American Recovery and Reinvestment Act of 2009 ("ARRA") provides substantial funds to modernize the electric grid, including through matching grants, as well as funds for state energy programs.
- (a) Might the CSR/MPP project qualify for funding under one or more ARRA programs?
 - (b) Could CL&P apply for ARRA funds directly, or would any such application require the cooperation or intervention of others (e.g., a State of Connecticut agency)?
 - (c) Has CL&P taken any steps to secure ARRA funds for CSR/MPP, in order to mitigate the cost to ratepayers of this project? If yes, please specifically describe those steps. If no, why not?
- OCC-5. Reference Section H.5.1.1 of the Application (p. H-49). The title of this Section states that it provides comparative cost estimates [initial capital costs, apparently] for four potential underground line route variations versus the comparable overhead line sections that CL&P recommends. However, the discussion following this title does not appear to provide the indicated comparisons.
- (a) Please provide those cost comparisons, in specific detail for the four route variations there discussed.
 - (b) Does CL&P believe that any incremental costs associated with such undergrounding would be treated by ISO-New England as eligible for regional (i.e., New England-wide) cost support, or would be treated as localized costs (i.e., to be borne by Connecticut ratepayers only)?
 - (c) Assume that any extra costs for such underground construction would be treated as a localized cost. On that basis, please provide a comparative estimate of the cost to Connecticut ratepayers for each potential underground route variation versus the comparable overhead line sections that CL&P recommends.
- OCC-6. Reference the two all-underground route variations evaluated for the Connecticut portion of GSRP (discussed on p. H-20 and otherwise).
- (a) CL&P states (p. H-12 & H-26) that it has assumed that both such line variations are technically feasible. What is the basis for this assumption?

- (b) Has CL&P performed any studies of whether either or both of these all-underground route variations would have an adverse effect on electric system reliability? If so, please provide copies of any such studies.

- OCC-7. Reference the two all-underground route variations evaluated for the Connecticut portion of GSRP (discussed on p. H-20 and otherwise).
- (a) Please provide comparative estimates for the initial capital costs, for both such line variations, versus the comparable overhead line configuration that CL&P recommends.
 - (b) Please provide an estimate of the counterpart life cycle costs (both nominal and present-valued) for these three items, computed using CSC's guidelines for such calculations.
 - (c) Does CL&P believe that any incremental costs associated with such undergrounding would be treated by ISO-New England as eligible for regional (i.e., New England-wide) cost support, or would be treated as localized costs (i.e., to be borne by Connecticut ratepayers only)?
 - (d) Assume that any extra costs for such underground construction would be treated as a localized cost. On that basis, please provide a comparative estimate of the cost to Connecticut ratepayers for both all-underground route variations versus the comparable overhead line that CL&P recommends.
- OCC-8. Reference the CEAB Evaluation Report to CSC, 2/17/09, p. 2, Item 2, stating that the CL&P Application does not include certain Connecticut power supply commitments in the needs assessment.
- (a) Why did the power flow assessments in the Application omit the indicated items?
 - (b) Please supply a revised need analysis which reflects inclusion of the indicated items.
 - (c) With that analysis, please provide all electronic spreadsheets, including all linked spreadsheets, relied upon. In those spreadsheets, please leave all cell formulas intact.
- OCC-9. Reference the CEAB Evaluation Report to CSC, 2/17/09, pp. 21 & 23, stating that the ISO-NE needs assessment for NEEWS is now dated.
- (a) Does CL&P agree with this CEAB statement? Why or why not? Please answer in specific detail.

- (b) If ISO-NE updates its needs assessment for NEEWS, does CL&P intend to update all relevant portions of its Application? Why or why not? Please answer in specific detail.

OCC-10. Reference the CEAB Evaluation Report to CSC, 2/17/09, pp. 24-25, stating that two transmission solution studies included with the Application rely on a now-dated ISO-NE needs analysis.

- (a) Does CL&P agree with this CEAB statement? Why or why not? Please answer in specific detail.
- (b) If ISO-NE updates its needs assessment for NEEWS, does CL&P intend to update all relevant portions of its Application? Why or why not? Please answer in specific detail.

OCC-11. Reference the CEAB Evaluation Report to CSC, 2/17/09, pp. 26-28, summarizing an ICF study of non-transmission alternatives included in the Application.

- (a) Does CEAB accurately summarize that ICF study?
- (b) Why did that ICF study fail to include the peaking generation projects approved by DPUC in June 2008?
- (c) Why did that ICF study assume that 350 MW of exports to New York would be maintained on the Cross Sound Cable?
- (d) Please supply a revised analysis of non-transmission alternatives, one which assumes inclusion of the DPUC-approved peaking projects, and of the NRG Meriden project, and which assumes curtailment of Cross Sound Cable flows.
- (e) In connection with Part (d) just above, please also include an analysis of variant cases that CL&P considers reasonable.
- (f) With the analyses responsive to Parts (d) and (e) just above, please provide all electronic spreadsheets, including all linked spreadsheets, relied upon. In those spreadsheets, please leave all cell formulas intact.

OCC-12. Reference the CEAB Evaluation Report to CSC, 2/17/09, pp. 28-31, summarizing an additional power flow case CEAB requested of CL&P.

- (a) Does CEAB accurately summarize that further ICF case?
- (b) Please supply a copy of that further ICF study.
- (c) Does CL&P agree with CEAB that further reliability assessments of this type would "have significant merit"?

- OCC-13 Please supply, for the record in this docket, a copy of each reliability assessment that CL&P provided to CEAB in connection with the CEAB RFP process.
- (a) If any such assessments already are on the record in this docket [e.g., per OCC-12(b)], specify where they are to be found rather than supplying a duplicate copy.
 - (b) In this connection, please also supply copies of any related letters or memoranda that CL&P provided to CEAB.
- OCC-14 Please supply, for the record in this docket, a copy of any economic comparisons that CL&P has prepared concerning the relative costs to Connecticut ratepayers of GSRP/MMP or NEEWS (on the one hand) versus a generation project such as the NRG Meriden Project (on the other).
- OCC-15. Reference the CEAB Evaluation Report to CSC, 2/17/09, pp. 21 & 23, stating that the ISO-NE needs assessment for NEEWS, on which the GSRP/MMP Application is based, is now dated.
- (a) Does ISO-NE agree with this CEAB statement? Please explain in specific detail.
- OCC-16. Reference the CEAB Evaluation Report to CSC, 2/17/09, p. 2, Item 3, stating that ISO-NE plans to revisit its needs assessment for NEEWS and similar projects.
- (a) When will any revised needs assessment prepared by ISO-NE be available?
 - (b) Is it possible that ISO-NE's revised needs assessment would conclude that GSRP/MMP, and/or NEEWS, is not needed?
- OCC-17. Reference the CEAB Evaluation Report to CSC, 2/17/09, p. 33, stating the current economic recession could have an impact on the regional load forecast.
- (a) Does ISO-NE agree with this observation?
 - (b) Has ISO-NE revised its regional load forecast, taking account of the current economic recession, or does it intend to do so?
 - (c) Please supply a copy of any load forecast, revised on the indicated basis, or state when any such revised forecast will be available.
- OCC-18. Reference the CEAB Evaluation Report to CSC, 2/17/09, p. 35, stating that none of the ISO-NE or NU power flow studies assessing GSRP or NEEWS have included the proposed NRG Meriden project.

- (a) Does ISO-NE agree with this observation?
- (b) Does ISO-NE believe that power flow studies which include the proposed NRG Meriden project would assist the evaluation of the need for GSRP/MMP and/or NEEWS?

OCC-19. Reference the CEAB Evaluation Report to CSC, 2/17/09, pp. 21, stating that combinations of two or more projects, considered as a portfolio, could provide an effective solution to the need that GSRP/MMP undertakes to address.

- (a) Does a combination consisting of the NRG Meriden proposal, together with what CEAB here refers to as "other resources to which Connecticut or ISO-NE have made contractual commitments" constitute a portfolio which might provide the indicated effective solution?
- (b) Does CEAB believe it would be helpful for such a portfolio to be analyzed in this context?
- (c) If yes to Part (b), is CEAB in a position to carry out such a study?
- (d) If no to Part (c), would CEAB recommend that CSC order CL&P to carry out such a study?
- (e) If no to Part (c), would CEAB recommend that CSC order NRG to carry out such a study?

OCC-20. Reference the CEAB Evaluation Report to CSC, 2/17/09, p. 42, stating that CEAB does not have sufficient information to make a definitive assessment of how the several projects responding to its RFP might meet the need that gave rise to the GSRP/MMP proposal.

- (a) Please describe the information that, if available, would enable CEAB to make a definitive assessment of this type.
- (b) In answering, assume that the NRG Meriden Project (CEAB Report, pp. 38-39) is the only alternative to GSRP/MPP pending in this CSC proceeding.

OCC-21. Reference the NRG Application, 3/19/09, pp. 12-17 (describing the Meriden Project), and its Appendix A (containing the 1999 CSC certificate authorizing construction of the Meriden Project).

- (a) Has anything about the technology, fuel supply, etc. of the Meriden Project, other than as already referenced in the NRG Application of 3/19/09, changed since the Project's 1999 CSC certification was granted? If yes, please describe all such changes in specific detail.

- (b) Does NRG intend to build the Meriden Project essentially as that project was described to CSC during the earlier proceeding? If not, please describe any material changes that are planned in that regard.
- (c) Does NRG believe it would need to obtain from CSC any changes to this Project's present certificate before commencing construction?

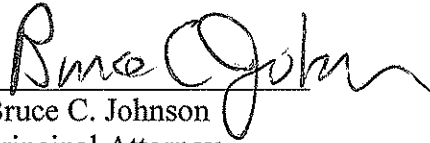
- OCC-22. Reference the CEAB Evaluation Report to CSC, 2/17/09, p. 38, stating that no D&M Plan, and no Operations Plan, was provided with NRG's RFP response.
- (a) Has CSC approved a D&M Plan for the Meriden Project?
 - (b) Has CSC approved an Operations Plan for the Meriden Project?
 - (c) If yes to either Part (a) or (b), please provide a copy of the pertinent CSC approval. If no to either Part (a) or (b), please explain why CSC approval of such Plans for this project remains pending.
- OCC-23. Is the Meriden Project, once on-line, intended to be dispatched as a peaking unit, an intermediate unit, or a baseload unit?
- OCC-24. Reference the NRG Application, 3/19/09, pp. 5, 11, and 21, referring to a long-term contract for the Meriden Project, one providing ratepayers with a hedge against volatile energy prices.
- (a) Please explain more fully the substantive terms expected in the "contract for differences" mentioned there. Would such a contract be substantially identical to the contracts that the DPUC approved for the peaking generation projects in June 2008 (in its Docket No. 08-01-01)?
 - (b) With whom does NRG anticipate any such contract would be entered? One or both of Connecticut's electric distribution companies?
 - (c) Does NRG regard ratepayer support (i.e., cost responsibility) as an essential component of any such contract?
 - (d) Please describe briefly what NRG believes would be the expected sequence of events for the company to obtain an appropriate contract for the Meriden Project. For instance, could the CSC approve such a contract? Could the DPUC do so? Could CSC recommend such a contract to the DPUC?
 - (e) Would a CSC determination in this proceeding, that the Meriden Project is "the most appropriate alternative", per CGS § 16-50p(a)(3)(F), assist any NRG effort to obtain the indicated long-term contract for the project? Would the absence of any such CSC determination interfere with any such NRG effort?

- OCC-25. Reference the “Comments of NRG Energy, Inc.”, a document apparently filed with CEAB on December 2, 2008.
- (a) Please file a copy of those comments in this proceeding.
 - (b) Does NRG wish to supplement or modify those comments at present? If so, please do so.
 - (c) Does NRG contend that a long-term contract for the Meriden Project could be structured to make the Project cost-effective for Connecticut ratepayers, relative to the FERC-approved rates that would support GSRP/MMP, even if the latter rates would be charged (at least in part) to ratepayers in the other New England states? Please explain in specific detail.
- OCC-26. Reference the CEAB Evaluation Report to CSC, 2/17/09, pp. 26-31, summarizing an ICF study of non-transmission alternatives to GSRP/MMP, as included in the CL&P Application.
- (a) Please supply a comparable analysis of non-transmission alternatives to GSRP/MMP, one which assumes inclusion of the DPUC-approved peaking projects, and of the NRG Meriden project, and which assumes curtailment of Cross Sound Cable flows.
 - (b) In connection with Part (a) just above, please also include an analysis of variant cases that NRG considers reasonable.
 - (c) With the analyses responsive to Parts (a) and (b) just above, please provide all electronic spreadsheets, including all linked spreadsheets, relied upon. In those spreadsheets, please leave all cell formulas intact.

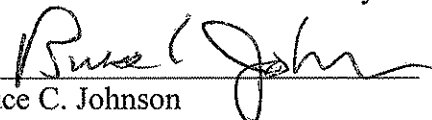
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Respectfully submitted,

MARY J. HEALEY
CONSUMER COUNSEL

By: 
Bruce C. Johnson
Principal Attorney

I hereby certify that a copy
of the foregoing has been mailed and/or
hand-delivered to all known parties and
intervenor of record this 2nd day of April 2009.


Bruce C. Johnson
Commissioner of Superior Court