



Filed Electronically and via First Class Mail

May 29, 2009

Mr. Daniel Caruso
Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, Connecticut 06051

RE: Docket No. 370: Consolidated Proceeding Pursuant to C.G.S. § 16-50I(a)(3)

Dear Mr. Caruso:

The Connecticut Energy Advisory Board ("CEAB") submits herewith an original and 20 copies of **responses to Interrogatories OCC-19, 20, 68, 69, 70, 71 and 72** issued by the Office of the Consumer Counsel in the above captioned proceeding.

Thank you for your assistance. Please contact me at 860-418-6374 with any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Cassella", written in a cursive style.

Michael E. Cassella
CEAB Chairman

CC: Office of Consumer Counsel
Michele Riverso, Office of the Attorney General
Service List

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?

CEAB Response:

- a) The referenced combination of resources do constitute a portfolio of resources. The CEAB does not have information sufficient to determine the effect that portfolio would have on the needs identified by CL&P or if that portfolio would provide an effective solution.
- b) Yes. Please refer to page 43, first full paragraph, of the CEAB 2/17/09 Report.
- c) No. The CEAB does not have the resources to conduct independent load flow studies.
- d) At the time that the CEAB report was prepared, ISO-NE had announced plans to review the needs assessment for the project, including addressing at least some of the referenced resources. The CEAB recommends that the CSC consider additional information from ISO-NE, CL&P or NRG that would indicate how these resources would affect the need for the GSRP. The CEAB does not have a recommendation for the CSC on how best to obtain that information within its proceeding.
- e) See response to d) above.

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.

CEAB Response:

- a) Please refer to the first full paragraph on p. 43 of the 2/17/09 Evaluation Report.
- b) The reference to “all three proposals” on p. 43 should be modified to refer only to the NRG Meriden Project to address the assumption posed in the question.

OCC-68. Reference CL&P's answer to OCC-008, filed in the docket on 4/17/09.

- (a) Please provide any comments *and/or* response that CEAB considers appropriate.
- (b) Does CEAB believe that the revised need analysis referenced in OCC-008(b), which CL&P has not carried out, would be a valuable addition to the record in this docket? Please explain any answer.

CEAB Response:

- a) The CEAB comments on each part of OCC-008 is as follows:
 - a. CL&P confirms in this response that its NTA study and its Updated GSRP Power-flow Analysis did not include the COS peaking units, which is consistent with CEAB's observations.
 - b. The CEAB supports CL&P's commitment to conduct an update of its need analysis to reflect the changes cited in the CL&P response for submission to the CSC in this proceeding. The CEAB recommends that CL&P also conduct an update of the ICF non-transmission alternatives study including the updated information in the base case. When the updates of the CL&P reliability assessments and the ICF non-transmission alternatives study are performed, the CEAB suggests that CL&P perform some additional analyses. The original ICF study examined the GSRP as a whole. It did not consider or evaluate whether non-transmission alternatives could replace some of the components of the GSRP. For example, adding additional amounts of generation in Connecticut appeared to effectively mitigate the criteria violations in Connecticut, but may not have eliminated the reliability criteria violations on the lines between Breckwood and the East and West Springfield buses. It is certainly possible that upgrading only those two older, low capacity lines, combined with additional generation in Connecticut, might effectively eliminate the other components of the GSRP. Because this scenario has not been studied, it is not possible to make an informed decision about the CL&P application. The CEAB believes that having such analyses would create a complete record upon which to base a decision.

- b) Yes, the CEAB believes the revised need analysis would be a valuable addition to the record. The CSC and the parties to the proceeding should have the benefit of current information in the record to examine when there are material changes, particularly with respect to market responses as called for in Section 4.2 of Attachment K of the ISO-NE Tariff. This analysis will allow CL&P to demonstrate directly and transparently that these changes do not have a material impact on the results, if that is in fact the case as CL&P contends. In addition, CEAB believes that the record would benefit from a direct assessment of the implications on the need for transmission upgrades if the NRG Meriden were to be installed as proposed.

OCC-69. Reference CL&P's answer to OCC-009, filed in the docket on 4/17/09.

(a) Please provide any comments and/or response that CEAB considers appropriate.

CEAB Response:

a) The CEAB's comments on CL&P's response to OCC-009 are as follows:

- 1) CL&P's responses to OCC-008 and OCC-009 and ISO-NE's response to OCC-016 confirm the CEAB's conclusion, as stated in February 17, 2009 Evaluation Report, that the ISO-NE's Needs Assessment is now dated. Attachment 1 to this response is a letter from the CEAB to the electric distribution utilities in September 2007 documenting the fact that the CEAB and the utilities understood then that the NEEWS needs assessment was dated at that time.
- 2) CL&P's disagreement with CEAB is based on CL&P's belief that the new information would not have a material impact on the assessment. CL&P does not dispute the fact that new capacity became committed after the assessments were conducted.
- 3) Contrary to CL&P's assertion, CEAB has neither the resources nor the responsibility to conduct its own power flow analysis. CL&P must provide the a complete and current assessments of the needs, the proposed transmission solutions, and alternatives in an application to the CSC which forms the basis of the CEAB's RFP process and, subsequently, the CSC's review of the application.
- 4) CEAB declined to consider additional analysis provided informally by CL&P on February 2, 2009, two weeks before CEAB's final report was required to be provided to the CSC. At the time the analysis was received, Board review to the draft Evaluation Report was underway. The CEAB posted that information and made it available to the CSC. However, the information was untimely for consideration by the CEAB under the statutory 45 day evaluation process. CEAB's letter to CL&P in included as Attachment 2.
- 5) CEAB supports CL&P's decision to conduct an updated needs assessment for the record in this proceeding.



Memorandum to: Lisa Thibdaue, CL&P
John Prete, UI
Maurice Scully, CMEEC

Subject: Supplemental Follow Up to Comments on Request for Proposal Process, NEEWS

From: John Mencacci, CEAB Chairman

Date: September 11, 2007

The Connecticut Energy Advisory Board (“CEAB”) appreciates the time and effort of all interested parties that responded to the CEAB’s Request for Comment in connection with potential Request for Proposal scenarios related to the New England East-West Solution (“NEEWS”). Input from interested parties is invaluable to the CEAB as it considers the optimal path forward.

The comments submitted by Northeast Utilities, United Illuminating and the Connecticut Municipal Electric Energy Cooperative (together, “the utilities”) on August 3, 2007 noted developments in the electric markets since the NEEWS need determination. They include, for example, the State’s approval of long-term contracts for approximately 800MW of new capacity; Public Act 07-242’s (Section 50) provision for peaking facility development; and, commencement of the Forward Capacity Market.

To assist the CEAB’s understanding of the prior NEEWS needs determination in light of current electric market developments and other changes, the CEAB requests that the utilities review the market and other developments identified in the comments and identify those, if any, that were assumed in the course of establishing the need for NEEWS. Those issues should include, but not be limited to, the following:

- Capacity additions resulting from the implementation of Public Act 05-01.
- Capacity additions and demand side measures resulting from the implementation of Public Act 07-242.
- The implementation of the Locational Forward Reserve Market in Connecticut.
- The Independent System Operator-New England’s Forward Capacity Market.
- Current load forecasts.
- The implementation of the Energy Policy Act of 2005, including changes in reliability standards, energy efficiency appliance standards, and demand response.

Additionally, to the extent there are other factors, market developments or changes in law that are relevant to the need for NEEWS that were not assumed or previously considered in the NEEWS need determination, please specifically identify and include such information. A joint response to this request is appreciated, however, to the extent there are different views, the utilities may provide separate statements to distinguish their differences or other areas considered important.

The CEAB requests a response by close of business on September 21, 2007. An electronic copy may be e-mailed to gdeans@cerc.com and one paper copy may be mailed via regular mail to:

CEAB
c/o Gretchen Deans
CERC
805 Brook Street, Building 4
Rocky Hill, Connecticut 06067

Again, the CEAB appreciates your time and assistance.



Filed Electronically and via First Class Mail

February 4, 2009

Ms. Kathy Shea
Director- NEEWS Projects
Northeast Utilities Service Company
107 Selden Street
Berlin, Connecticut 06037

Dear Ms. Shea:

This is to acknowledge receipt of the analysis you sent via electronic mail to Dan Peaco and Richard Hahn at La Capra Associates in connection with proposals the Connecticut Energy Advisory Board (CEAB) received in reply to its request for alternatives to the Greater Springfield Reliability project.

At this stage in the CEAB's bid evaluation process, it is not possible for the Board to consider unsolicited information or analysis on proposed projects. In the interest of full disclosure, the CEAB will post the non-confidential portion of the analysis you provided to La Capra Associates as it has posted other non-confidential bid information, but will not consider the analysis in its evaluation.

As you know, the CEAB will forward the results of the evaluation process to the Connecticut Siting Council for its consideration. This process provides ample opportunity for further consideration of the proposals and your company's assessment of them.

Prospectively, during the CEAB's evaluation of projects it receives in response to a request for proposal, information or questions should be submitted to the CEAB through Gretchen Deans at the Connecticut Economic Resource Center. Additionally, the CEAB requests that persons who submit materials to the CEAB that are confidential or that contain Critical Energy Infrastructure Information clearly mark them as such.

Sincerely,

Michael Cassella
Chairman
Connecticut Energy Advisory Board

OCC-70: Reference CL&P's answer to OCC-010, filed in the docket on 4/17/09.

(a) Please provide any comments and/or response that CEAB considers appropriate.

CEAB Response:

a) The CEAB's comments on CL&P's response to OCC-010 are as follows:

- 1) The CEAB supports CL&P's decision to conduct an updated analysis of the transmission solutions. If CL&P's assertions that recent changes do not affect the need or the solution, those studies should provide the record evidence needed to support that assertion.

OCC-71: Reference CL&P's answer to OCC-11, filed in the docket on 4/17/09.

- (a) Please provide any comments and/or response that CEAB considers appropriate.
- (b) Reference the revised analysis described in OCC-11 (d), which CL&P states will be provided as a supplement to CSC-018. Does the supplemental response to CSC-018, which CL&P filed on 4/20/09, make all of the assumptions [e.g., curtailment of the Cross Sound Cable 1 requested in OCC-11 (d)?

CEAB Response:

- a) The CEAB's comments on CL&P's response to OCC-011 are as follows:
 - 1) The CEAB supports CL&P's decision to provide the additional cases requested in OCC-11.
 - 2) With respect to the firm contract for power across the Cross Sound Cable, the CEAB was informed that ISO-NE rules and operating practice provide for interruption of those deliveries when system contingencies occur, as noted in the 2/17/09 Evaluation Report, p. 29. CL&P should provide precise descriptions within the ISO-NE market rules, OATT, or Operating Procedures of the requirements to continue deliveries to Long Island as part of its response.

- b) CEAB recommends that the OCC direct this question to CL&P.

OCC-72: Reference CL&P's answer to OCC-12, filed in the docket on 4/17/09.

(a) Please provide any comments *and/or* response that CEAB considers appropriate.

CEAB Response:

a) The CEAB's comments on CL&P's response to OCC-012 are as follows:

- 1) The CEAB request this single case after review of the ICF Study and concluding that the range of cases examined by ICF did not encompass the amount of generation that was coming from the DPUC's contracting activity (particularly the Cost of Service Peaking Capacity RFP) and the potential for additional generation that could be proposed in the CEAB RFP process.
- 2) The CEAB and CL&P agreed on a scope for an additional power flow analysis that ICF would conduct for the CEAB which was limited to a single additional case to test the effect of a large generation response in Connecticut.
- 3) The CEAB had a limited amount of time to review the results of the additional power flow analysis prior to the start of the RFP process, the timing of which being established by statute.
- 4) That single additional power flow analysis produced a result that indicated that additional generation in Connecticut would effectively mitigate many, but not likely all, of the reliability criteria violations. In particular, additional amounts of generation in Connecticut appeared to effectively mitigate the criteria violations in Connecticut, but did not eliminate the reliability criteria violations on the underground lines between Breckwood and the East and West Springfield buses.
- 5) From this analysis, CEAB conclude that (a) further analyses of additional, more strategically located generation would help determine if non-transmission solutions could mitigate all of the reliability violations or (b) combinations of non-transmission alternatives and select portions of the GSRP would mitigate all of the reliability violations and represent a more cost-effective alternative. For example, is it possible to develop an effective solution by upgrading only those two older, low capacity lines, combined with additional generation in Connecticut?
- 6) The CEAB believes the additional analysis would be beneficial to inform the CSC on the question of whether added Connecticut generation could be part of an effective alternative to the proposed GSRP or not.