

STATE OF CONNECTICUT

SITING COUNCIL

<p>The Connecticut Light and Power Company application for a Certificate of Environmental Compatibility and Public Need for (1) The Greater Springfield Reliability Project consisting of a new 345-kV electric transmission line and associated facilities from the North Bloomfield Substation in Bloomfield to the Connecticut/Massachusetts border, together with associated improvements to the North Bloomfield Substation, and potentially including portions of a new 345-kV electric transmission line between Ludlow and Agawam, Massachusetts that would be located in the Towns of Suffield and Enfield, Connecticut; and (2) the Manchester Substation to Meekville Junction Circuit Separation Project in Manchester, Connecticut.</p>	<p>DOCKET NO. 370A</p>
<p>APPLICATION OF NRG ENERGY, INC. PURSUANT TO CONNECTICUT GENERAL STATUTES § 16-50(a)(3)</p>	<p>DOCKET NO. 370B  JUNE 5, 2009</p>

**FIRST SET  
INTERROGATORIES AND DATA REQUESTS  
ADDRESSED TO THE OFFICE OF CONSUMER COUNSEL  
BY THE CONNECTICUT LIGHT AND POWER COMPANY**

Please provide answers to the following interrogatories and data requests by

June 19, 2009.

**A. DEFINITIONS:**

**Evaluation Report** – The Connecticut Energy Advisory Board Evaluation Report to The Connecticut Siting Council,” d. February 17, 2009.

**Meriden Plant** – The Generating Plant proposal of NRG Energy, Inc., evaluated in the “Evaluation Report,” which is the subject of docket 370B.

**B. REQUESTS**


1. Do you expect that Richard Chernick will provide testimony in the Docket as an expert witness, with respect to:
  - a. The need for the proposed Greater Springfield Reliability Project (GSRP).
  - b. The need for the Manchester to Meekville Jct. Line Separation Project (MMP).
  - c. Whether, or to what extent, the Meriden Plant provides a practical alternative solution to the need addressed by GSRP and/or MMP.
  - d. Application of reliability standards and criteria of NERC, NPCC, and/or ISO-NE to: (i) the existing transmission facilities in the Greater Springfield area and in north-central Connecticut; (ii) the proposed GSRP and MMP; and/or (iii) the Meriden Plant.
  
2. If the answer to any part of the previous question is in the affirmative, please:
  - a. List all proceedings (by Agency, Docket Number and Title) in which Mr. Chernick, has provided a report, written statement, or written or oral testimony since January 1, 2002 with respect to the need for an electric transmission line or alternatives to an electric transmission line, and as to each such proceeding:
    - i. Identify the voltage and location of the proposed line.
    - ii. Identify the party or intervenor who offered the statement, report, or testimony of Mr. Chernick.
    - iii. Identify the nature [e.g., written statement, written report, pre-filed testimony, oral testimony] and date of each such statement.

- iv. With respect to any oral testimony, state whether a transcript was prepared.
  - v. State the position he adopted with respect to the need for, or the alternative(s) to, the proposed line in each such statement.
  - vi. State the ultimate ruling, if any, of the agency to which the testimony was provided.
  - vii. State whether Mr. Chernick is in possession of a transcript of his testimony and, if so, produce a copy thereof for inspection.
3. Will Mr. Chernick's testimony in this Docket be based in part on any written analyses, computer modeling or simulation, or power-flow studies prepared or commissioned or to be prepared or commissioned by him?
- a. If so, please identify and produce copies of all work papers, electronic spreadsheets, computer output and other documents comprising or supporting those analyses.
4. Has Mr. Chernick evaluated or analyzed the "Economic Analysis" of the GSRP and the bid projects in the CEAB Evaluation Report?
- a. If so, please provide copies of any writings that contain or reflect is analysis.
5. Exhibit F to the Evaluation Report sets forth a "Forecast of the Net Costs" of each RFP bid. Please comment on the degree of accuracy to which the net benefits forecast for the bid projects in that table are likely to be predicted.
6. Is there a risk that the net benefits projected by CEAB for the later years of a Meriden contract would not be realized, after net costs equally or greater than those projected for the early years had been realized?

- a. Would it be reasonable for the Council to take such a risk into account should they make an economic comparison between GSRP and the proposed Meriden Plant?
7. In the late 1980s/early 1990s, CL&P was required to enter into a number of long-term electricity purchase agreements with independent generators pursuant to the Public Utility Regulatory Policies Act of 1978 (or PURPA). In order to support the development of co-generation plants by private enterprises, these contracts provided for “front-loaded” pricing (i.e. purchases at prices above the estimated “avoided costs” of self generation) in the early years of the contract and purchases at prices below projected avoided costs in the later years of the contract. These contracts ultimately resulted in net costs to Connecticut ratepayers of more than \$1 billion. What contract structure and terms would CEAB recommend for the purpose of avoiding the risk of similar losses from a bi-lateral contract designed to support the construction of the Meriden Plant?

Respectfully submitted,

**THE CONNECTICUT LIGHT AND  
POWER COMPANY**

By:   
Anthony M. Fitzgerald  
of Carmody & Torrance LLP  
Its Attorneys  
195 Church Street  
New Haven, CT 06509-1950  
(203) 777-5501

**CERTIFICATION**

This is to certify that a copy of the foregoing has been served on this 5th day of June, 2009 upon all parties and intervenors as listed on the attached Service List, via the document service manner set forth therein.

  
\_\_\_\_\_  
Anthony M. Fitzgerald

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Applicant</b>	<input checked="" type="checkbox"/> U.S. Mail	The Connecticut Light & Power Co. P.O. Box 270 Hartford, CT 06141-0270	Robert E. Carberry, Manager NEEWS Projects Siting and Permitting Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-6774 <a href="mailto:carbere@nu.com">carbere@nu.com</a>
	<input checked="" type="checkbox"/> E-mail		Duncan MacKay, Esq. Legal Department Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3495 <a href="mailto:mackadr@nu.com">mackadr@nu.com</a>
	<input checked="" type="checkbox"/> U.S. Mail		Jeffrey Towle, Project Manager Transmission, NEEWS Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3962 <a href="mailto:towlejm@nu.com">towlejm@nu.com</a>
	<input checked="" type="checkbox"/> U.S. Mail		Anthony M. Fitzgerald, Esq. Brian T. Henebry, Esq. Carmody & Torrance LLP P.O. Box 1950 New Haven, CT 06509 (203) 777-5501 <a href="mailto:afitzgerald@carmodylaw.com">afitzgerald@carmodylaw.com</a> <a href="mailto:bhenebry@carmodylaw.com">bhenebry@carmodylaw.com</a>
<b>Intervenor (granted on February 19, 2009)</b>  <b>Competing Applicant as of 03/19/2009</b>	<input checked="" type="checkbox"/> U.S. Mail	NRG Energy, Inc.	NRG Energy, Inc. c/o Julie L. Friedberg, Senior Counsel – NE 211 Carnegie Center Princeton, NJ 08540
	<input checked="" type="checkbox"/> U.S. Mail		Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-5723 – fax <a href="mailto:alord@murthalaw.com">alord@murthalaw.com</a>

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	<input checked="" type="checkbox"/> U.S. Mail   <input checked="" type="checkbox"/> E-Mail	NRG Energy, Inc. continued...	Jonathan Milley Vice President, NE Region NRG Energy, Inc. 211 Princeton, NJ 08540 (609) 524-4680 (609) 524-5160 fax <a href="mailto:Jonathan.milley@nrgenergy.com">Jonathan.milley@nrgenergy.com</a>  Diana M. Kleefeld, Esq. Murtha Cullina LL CityPlace I, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6035 (860) 240-5974 <a href="mailto:dkleefeld@murthalaw.com">dkleefeld@murthalaw.com</a>
<b>Party (granted November 20, 2008)</b>	<input checked="" type="checkbox"/> E-mail	Richard Blumenthal Attorney General	Michael C. Wertheimer Assistant Attorney General Attorney General's Office 10 Franklin Square New Britain, CT 06051 (860) 827-2620 (860) 827-2893 <a href="mailto:Michael.wertheimer@po.state.ct.us">Michael.wertheimer@po.state.ct.us</a>
<b>Party (granted November 20, 2008)</b>	<input checked="" type="checkbox"/> E-mail   <input checked="" type="checkbox"/> U.S. Mail	Town of East Granby	Donald R. Holtman, Esq. Katz & Seligman, LLC 130 Washington Street Hartford, CT 06106 (860) 547-1857 (860) 241-9127 <a href="mailto:dholtman@katzandseligman.com">dholtman@katzandseligman.com</a>  The Honorable James Hayden First Selectman Town of East Granby P.O. Box 1858 East Granby, CT 06026

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<b>Party (granted November 20, 2008)</b>	<input checked="" type="checkbox"/> U.S. Mail  <input checked="" type="checkbox"/> U.S. Mail	Town of Suffield	Edward G. McAnaney, Esq. McAnaney & McAnaney Suffield Village 68 Bridge Street Suffield, CT 06078 (860) 668-2000 (860) 668-2666 – fax Mcananey-mcananey@att.net  The Honorable Scott R. Lingenfelter First Selectman Suffield Town Hall 83 Mountain Road Suffield, CT 06078
<b>Intervenor (granted December 4, 2008)</b>	<input checked="" type="checkbox"/> E-mail  <input checked="" type="checkbox"/> U.S. Mail	ISO New England Inc.	Anthony M. Macleod Whitman Breed Abbott & Morgan LLC 500 West Putnam Avenue, P.O. Box 2250 Greenwich, CT 06830-2250 (203) 862-2458 <a href="mailto:amacleod@wbamct.com">amacleod@wbamct.com</a>  Kevin Flynn, Esq. Regulatory Counsel ISO New England One Sullivan Road Holyoke, MA 01040 (413) 535-4177 <a href="mailto:kflynn@iso-ne.com">kflynn@iso-ne.com</a>
<b>Party (granted on January 8, 2009)</b>	<input checked="" type="checkbox"/> U.S. Mail  <input checked="" type="checkbox"/> E-Mail	Office of Consumer Counsel	Mary J. Healey Consumer Counsel Ten Franklin Square New Britain, CT 06051 <a href="mailto:Mary.healey@ct.gov">Mary.healey@ct.gov</a>  Bruce C. Johnson Principal Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 <a href="mailto:Bruce.johnson@ct.gov">Bruce.johnson@ct.gov</a>





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Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<p style="text-align: center;"><b>Party</b> <b>(granted on</b> <b>April 7, 2009)</b></p>	<input checked="" type="checkbox"/> U.S. Mail	City of Meriden	Deborah L. Moore, City Attorney Meriden City Hall Department of Law 142 East Main St. Meriden, CT 06450 (203) 630-4045 (203) 630-7907 – fax <a href="mailto:dmoore@ci.meriden.ct.us">dmoore@ci.meriden.ct.us</a>
	<input checked="" type="checkbox"/> U.S. Mail		Lawrence J. Kendzior, City Manager Meriden City Hall 142 East Main St. Meriden, CT 06450 <a href="mailto:lkendzior@ci.meriden.ct.us">lkendzior@ci.meriden.ct.us</a>
<p style="text-align: center;"><b>Party</b> <b>(granted on</b> <b>April 7, 2009)</b></p>	<input checked="" type="checkbox"/> U.S. Mail	The United Illuminating Company (UI)	John J. Prete The United Illuminating Company 157 Church Street New Haven, CT 06506-1904 (203) 499-3701 (203) 499-3728 <a href="mailto:uiregulatory@uinet.com">uiregulatory@uinet.com</a>
	<input checked="" type="checkbox"/> U.S. Mail		Linda L. Randell Senior Vice President, General Counsel and Corporate Secretary UIL Holdings Corporation 157 Church St., P.O. Box 1564 New Haven, CT 06506-0901 (203) 499-2575 (203) 499-3664 <a href="mailto:Linda.randell@uinet.com">Linda.randell@uinet.com</a>
	<input checked="" type="checkbox"/> E-Mail		Bruce L. McDermott Wiggin and Dana LLP One Century Tower New Haven, CT 06508-1832 (203) 498-4340 (203) 782-2889 <a href="mailto:bmcdermott@wiggin.com">bmcdermott@wiggin.com</a>

