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September 18, 2009

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

Re: Dockets No. 370A and 370B, Application of The Connecticut Light & Power Company for the Greater Springfield Reliability Project and for the Manchester to Meekville Junction Circuit Separation Project ("GSRP/MMP") and NRG, Inc. Application for 530 MW Generating Plant in Meriden

Dear Mr. Phelps:

On behalf of ISO New England Inc. (the "ISO"), I write regarding two issues which involve scheduling: the availability of the Office of Consumer Counsel ("OCC") witness and, to the extent that it may require cross-examination by the ISO regarding reliability issues, the pre-filed testimony of Citizens Against Overhead Power Line Construction ("CAOPLC").

As noted in the undersigned's August 20, 2009 letter in response to the Connecticut Siting Council's August 17, 2009 notice revising the hearing schedule in the above-referenced dockets, scheduling conflicts will prevent the undersigned from attending the October 21, 2009 hearing in the above-referenced docket. Furthermore, it is likely that ISO personnel, including ISO witnesses, will be unavailable on that date due to a PAC meeting, and we requested that ISO be scheduled for cross-examination on October 27 or 28, 2009.

Having noted the OCC request for its witness, Mr. Paul Chernick, to testify on October 21, 2009, the undersigned asked the OCC to make Mr. Chernick available on October 22 or on subsequent hearing dates. Not having received an affirmative response from the OCC in this regard, the ISO requests that the Siting Council schedule Mr. Chernick for cross-examination, at least by the ISO, on October 22, 2009.

With respect to the pre-filed testimony of CAOPLC, the ISO generally prefers that routing issues and environmental factors be addressed by other participants, including local groups. However, the ISO is concerned that CAOPLC's pre-filed testimony, at least with respect to matters such as

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the use of HVDC or HVDC-Light Technology, exceeds the announced scope of the Joint Hearings before the Siting Council and the Massachusetts Energy Facilities Siting Board ("EFSB") because the advocacy of a different technology inevitably raises questions regarding reliability and the extent to which such technology can meet the identified need addressed by the proposed GSRP. This is clear from the reference in CAOPLC's pre-filed testimony itself to such factors, examined in Docket 272, as the risk of harmonics and operational factors associated with HVDC (See, e.g., CAOPLC PFT, p. 17) and cross-examination by the ISO in Docket 272 regarding the reliability and feasibility of HVDC technology in that case. (Id. at p. 24).

The ISO does not believe the Joint Hearings were intended to investigate the use of a new technology or to delve into the many issues that would surround such an examination, nor had the ISO intended to prepare on short notice for such an extensive exploration of this new technological issue. Accordingly, the ISO requests that the Joint Hearings not address that portion of CAOPLC's pre-filed testimony which covers HVDC and HVDC Light technology.

Please let me know if you have any questions regarding our request or would like further information.

Sincerely,

Anthony M. Macleod

Kevin Flynn, Esq. cc: Service List

<sup>&</sup>lt;sup>1</sup> The September 1, 2009 CSC/EFSB Joint Memo stated that the subject matter of the joint hearings would be "limited to the environmental impacts, and relative costs and reliability concerns, of the Northern and Southern Routes, exclusive of need." (Id. at p. 2). The Joint Memo did not allow for introduction of a new technology.