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ORIGINAL

January 14, 2010

VIA FEDERAL EXPRESS

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

RE: ***Connecticut Siting Council Docket No. 370***

Dear Mr. Phelps:

Enclosed is an original and twenty (20) copies of the Massachusetts Municipal Wholesale Electric Company's ("MMWEC") written comments in Connecticut Siting Council Docket No. 370, regarding the Connecticut Light and Power Company's application for Certificates of Environmental Compatibility and Public Need, and NRG Energy Inc.'s competing application pursuant to Connecticut General Statutes §16-50l(a)(3) for consideration of a 530 MW combined cycle generating plant in Meriden, Connecticut. MMWEC submits these written comments pursuant to Connecticut General Statutes §§ 16-50n and 4-177a, and Regulations of Connecticut State Agencies § 16-50j-31.

Please contact me should you have any questions with respect to MMWEC's Comments.

Sincerely,

Nicholas J. Scobbo, Jr.

NJS/BFA/tk
Enc.
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ORIGINAL

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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 Connection 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; AND NRG Energy, Inc., application for consideration of a 530 MW combined cycle plant in Meriden, Connecticut	)	**Docket No. 370 Consolidated**
	)	**January 14, 2010**

COMMENTS OF THE MASSACHUSETTS MUNICIPAL WHOLESALE ELECTRIC COMPANY

On October 20, 2008, pursuant to Connecticut General Statutes § 16-50k, Northeast Utilities Service Company, on behalf of the Connecticut Light & Power Company ("CL&P") submitted an Application for Certficiates of Environmental Compatibility and Public Need for the Connecticut Portion of the Greater Springfield Reliability Project ("GSRP") and For the Manchester to Meekville Junction Circuit Separation Project ("Application"). *CL&P Ex. 1.* CL&P proposes to construct a new 345-kilovolt (kV) electric transmission line from the North Bloomfield Substation in Bloomfield, Connecticut to the Massachusetts/Connecticut state line between Agawam, Massachusetts and Suffield, Connecticut, associated improvements of the North Bloomfield Substation (collectively, the GSRP), and improvements to existing 115-kV and 345-kV transmission circuits in Manchester, Connecticut, known as the Manchester to

Meekville Project ("MMP"). *Ibid.*

On June 18, 2009, the Massachusetts Municipal Wholesale Electric Company ("MMWEC") filed a Request for Intervenor Status ("Request") in this proceeding. On July 16, 2009, the CSC granted MMWEC's Request. Pursuant to Connecticut General Statutes Section 16-50n and Section 4-177a, and Regulations of Connecticut State Agencies Section 16-50j-15a, MMWEC offers the following comments with respect to CL&P's Application.

I. THE GSRP AND MMP ARE NEEDED TO PROVIDE RELIABLE TRANSMISSION SERVICE TO CONNECTICUT

The GSRP and MMP will eliminate the reliability criteria violations which have and will occur absent such transmission upgrades, in both Connecticut and Massachusetts. Tr. 10/28/09, at 28. Reliable transmission service in Connecticut is dependent, in part, on the maintenance of transfer capability levels from Massachusetts into Connecticut. Tr. 10/27/09, at 172. The GSRP is needed, in part, because it will allow Connecticut to maintain its current 2500 MW interface reliably with Massachusetts. *CL&P Ex. 15*, at 37.

When generation on the western side of the Springfield area is unavailable, the 115 kV transmission lines in and around the Springfield area become overloaded. Tr. 10/27/09, at 124-130. Such overloads prohibit generation on the eastern side of the Springfield area from contributing to power-flows into Connecticut. *Ibid.* As a result, if the generation to the west of Springfield were unavailable, the only option would be to reduce significantly Connecticut's ability to import energy from Massachusetts, from 2500 MW, to as low as 300 MW. *Id.* at 130. Such a reduction in import capability into Connecticut would have a significant adverse affect on reliable transmission in Connecticut. *Id.* at 131. The GSRP will alleviate Connecticut's over-dependence on western Springfield generation, allowing generation on the eastern side of Springfield to provide interface reliability to Connecticut.

In addition to maintaining Connecticut's import capability, the GSRP, in conjunction with the MMP, will resolve several other reliability issues in the Springfield area and in Northern Connecticut. For example, at present, the transmission system in the Springfield area is too weak to accommodate significant generation additions. Tr. 10/28/09, at 9-12. The transmission upgrades proposed by CL&P will allow new generation constructed in the Springfield area to participate in the ISO-NE markets, and serve Connecticut load from the eastern side of Springfield, therefore contributing to Connecticut transmission reliability. *Ibid.*

II. THE GSRP WILL PROVIDE CONNECTICUT WITH ACCESS TO LOWER COST, LOWER EMISSION GENERATION LOCATED IN MASSACHUSETTS

Power generating plants, among other facilities, have had a significant impact on the Connecticut environment. Continued operation of such generation could adversely affect the quality of the environment, if not properly planned and controlled. Conn. Gen. St. § 16-50g. On December 12, 2008, the Massachusetts Energy Facilities Siting Board ("EFSB") issued its Final Decision in EFSB Docket No. EFSB 07-6, approving MMWEC's petition to site and construct a third generating facility at its Stony Brook Energy Center, located in Ludlow, Massachusetts. MMWEC's proposed new facility, Stony Brook Unit 3, will be capable of generating 280 net megawatts (winter). New generation, such as Stony Brook Unit 3, will provide a lower-cost, lower-emission alternative to Reliability Must Run ("RMR") generation units, which RMR units will continue to need to be available for system reliability until the GRSP is completed. *CL&P Ex. 1,* at ES-2; *CL&P Ex. 15* at 22.

However, if Stony Brook Unit 3 is brought on-line under current transmission conditions, it may exacerbate the Greater Springfield and north-central Connecticut transmission reliability issues, rather than provide the benefits of lower-cost, lower-emission generation. Tr. 10/28/09, at 12. The GSRP will assist in the development and siting of generation in Massachusetts and

Connecticut, because it will allow environmentally and economically desirable generation, such as Stony Brook Unit 3, to come on-line without adverse impacts to the transmission system. *Ibid.* As a result, the GSRP will increase the security of the electric supply to Connecticut, and provide Connecticut with better access to power sources outside of Connecticut, which will provide Connecticut with lower cost, more efficient, and lower-emission generation, than that currently provided by the RMR generation units. *CL&P Ex. 1*, at ES-2.

III. THE NEED TO BE ADDRESSED BY THE GSRP IS IMMEDIATE

The reliability issues giving rise to the need for the GSRP and MMP are immediate, and, therefore, the GSRP and MMP are needed as soon as they can be put in service. *ISO-NE Ex. 3*; Tr. 10/27/09 at 161-162. Currently, the Springfield and northern Connecticut transmission system is incapable of successfully mitigating the contingencies that ISO-NE is required to address under the NERC, NPCC, and ISO PP3 standards. Tr. 10/28/09, at 26. The ISO-NE Regional System Plans have identified the unreliability of the transmission system in the Springfield area and northern Connecticut since at least 2005. Tr. 10/28/09, at 13. As a result, for example, in July 2005, the unavailability of certain Springfield area generation caused ISO-NE to take emergency actions in order to avoid transmission system failures. Tr. 10/27/09, at 179. Such emergency actions put the transmission system at risk of dropping load, in the event of a subsequent contingency. *Id.* at 180. Similarly, as recently as 2009, the area transmission system was vulnerable to dropping load due to transmission system contingencies. Tr. 10/27/09, at 181.

Relying on operating procedures, rather than constructing transmission system improvements, carries significant risk of system failures and loss of load. *Id.* at 190. As such, solutions posed by other parties to this proceeding, *e.g.*, the Meriden project, are not a substitute

for the GSRP and MMP solutions. However, bringing a transmission system upgrade from conception to completion is a lengthy process. *Id.* at 191. With respect to the needs giving rise to GSRP and MMP, the NEPOOL Planning Advisory Committee meetings first addressed the need for transmission system improvements in 2005. *Ibid.* GSRP construction is expected to begin in the 3rd quarter of 2010, and to be completed and in-service by fourth quarter 2013. *CL&P Ex. 15*, at 16. As a result, should the GSRP and MMP be completed on schedule, the Connecticut and Springfield area transmission system will have assumed the risks posed by the condition of the transmission system for at least eight years. Any delay beyond the projected fourth quarter 2013 in-service date brings with it more risk, particularly as area load continues to grow. Therefore, the Council should approve the GSRP and MMP, and condition such approval in such a way as to not delay the in-service date beyond fourth quarter 2013.

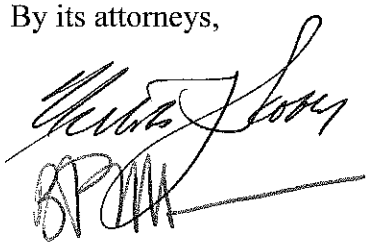
Several types of conditions could delay the in-service date of the GSRP. For example, the undergrounding of the 12-mile 345-kV transmission line within CL&P's existing right of way would require approximately two years to complete. *CL&P Ex. 1*, at H-25. Undergrounding also would have significant adverse environmental and cost impacts. *CL&P Ex. 15*, at 27-29. If the GSRP and MMP were to be divided into two projects, one in Massachusetts and one in Connecticut, whereby the existing weak ties between western Massachusetts and Connecticut would be cut, it would result in delay in the in-service of the transmission system solutions, at a greater cost, relative to the GSRP and MMP. Tr. 10/28/09, at 19. Also further delay could occur were the Council to require ISO-NE or others to study the feasibility of remedying the transmission issues by constructing additional generation in Connecticut. *Id.* at 26.

IV. CONCLUSION

For the above reasons, MMWEC respectfully requests that the Council approve CL&P's Application with conditions, if any, which will not delay the in-service date of the GSRP and MMP.

MASSACHUSETTS MUNICIPAL WHOLESALE ELECTRIC COMPANY

By its attorneys,



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Date: January 14, 2010

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STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Re: The Connecticut Light and Power Company	)	**Docket No. 370**
application for Certificates of Environmental	)	**Consolidated**
Compatibility and Public Need for the Connecticut	)	
Valley Electric Transmission Reliability Projects	)	
which consist of (1) The Connection portion of the	)	
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the municipalities of Bloomfield, East Granby, and	)	
Suffield, or potentially including an alternate portion	)	
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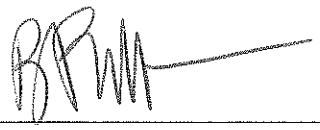
terminating at the North Bloomfield Substation; and (2)	)	
the Manchester Substation to Meekville Junction Circuit	)	
Separation Project in Manchester, Connecticut; AND	)	
NRG Energy, Inc., application for consideration of a	)	
530 MW combined cycle plant in Meriden, Connecticut	)	**January 14, 2010**

CERTIFICATE OF SERVICE

I, Bruce F. Anderson, hereby certify that I have this 14th day of January, 2010, served a true copy of the foregoing documents *via* first class mail, postage prepaid, or *via* e-mail, upon all known Parties and Intervenors of record in the above captioned proceeding.



Bruce F. Anderson

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