#### STATE OF CONNECTICUT

#### CONNECTICUT SITING COUNCIL

The Connecticut Light & Power Company Application for a Certificate of Environmental Compatibility and Public Need for the Connecticut Portion of the Interstate Reliability Project that traverses the municipalities of Lebanon, Columbia, Coventry, Mansfield, Chaplin, Hampton, Brooklyn, Pomfret, Killingly, Putnam, Thompson, and Windham, which consists of (a) new overhead 345-kV electric transmission lines and associated facilities extending between CL&P's Card Street Substation in the Town of Lebanon, Lake Road Switching Station in the Town of Killingly, and the Connecticut/Rhode Island border in the Town of Thompson; and (b) related additions at CL&P's existing Card Street Substation, Lake Road Switching Station, and Killingly Substation.

Docket No. 424

MARCH 23, 2012

### **REQUEST FOR CONTINUANCE**

Applicant, The Connecticut Light and Power Company (CL&P) respectfully requests that the dates for filing testimony and for evidentiary hearings in the schedule set forth in the Connecticut Siting Council's Notice of Public Hearing (the "Notice") issued February 27, 2012 and in the schedule distributed at the Council's Prehearing Conference ("PHC") on March 21, 2012 be rescheduled as follows:

(a) CL&P requests that the currently established date of April 17, 2012, for filing responses to pre-hearing interrogatories and pre-field testimony, exhibits, witness lists, and items to be noticed administratively (the Pre-Filing Date), and that the evidentiary hearings currently scheduled for February 27, 2012 for May 1, 3, 22, and 23, 2012 be cancelled.

(b) CL&P further requests that it be given the opportunity to file with the Council, on or before April 20, 2012, a suggestion for a new Pre-Filing Date, which CL&P expects would be between June 15, 2012 and September 3, 2012.

The basis for this request is as follows:

At the March 21, 2012 PHC, Anthony Macleod, attorney for the Independent System Operator-New England (ISO-NE), advised attendees that ISO-NE had not yet intervened in the Docket and would be unable to intervene or present pre-filed testimony within the times contemplated by the present schedule because, as part of its normal regional transmission planning process, it was engaged in updating its needs assessments for New England reliability projects, including the Interstate Reliability Project, in light of relevant new planning information, such as the outcome of the upcoming Forward Capacity Auction, the changes in the load forecast, and changes to the New England transmission topology; this effort would not be completed before the scheduled date for submitting pre-filed testimony; and ISO-NE did not have a firm timeline for completing the update.

As CL&P reported at the PHC, it cannot present a need case without precise knowledge of ISO-NE's latest need analyses and intended testimony. Further, CL&P believes that it is in the best interests of all Docket participants and of the Council to defer evidentiary hearings until ISO-NE is ready to proceed.

CL&P expected to proceed in accordance with the Council's current schedule until it learned, a few days before the PHC, of the development reported by Mr. Macleod. However, as a result of that development it is not now in a position to comply with the current schedule.

After the PHC, CL&P was able to obtain from ISO-NE some further information concerning the time it will require to complete the update. CL&P's conclusion is that ISO-NE could be in a position to provide pre-filed testimony as early as June 15, 2012 or as late as Sept, 3, 2012, depending on what the scope of the effort turns out to be. Further, CL&P believes that ISO-NE should be in a position to identify this date with more precision by April 20, 2012, approximately a month from now. Accordingly, CL&P has suggested the procedure whereby CL&P (and, it hopes, ISO-NE) will suggest by April 20 a date certain for the rescheduled Pre-Filing Date, so that the Council could set new hearing dates accordingly.

CL&P will consent to any extension of the time for decision pursuant to Conn. Gen. Stats. § 16-50q (a) (2) that the Council may determine it will requires in order to grant the request made herein.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY,

By:

Anthony M. Pitzgerald (Carmody & Torrance LLF

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P.O. Box 1950

New Haven, CT 06509-1950

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### **CERTIFICATION**

I hereby certify that a copy of the foregoing has been electronically mailed / sent by U.S. Mail on this 23<sup>rd</sup> day of March, 2012 upon all parties and intervenors as referenced in the Connecticut Siting Council's Service List dated March 20, 2012.

Anthony M. Fitzger

Date: March 20, 2012

## LIST OF PARTIES AND INTERVENORS <u>SERVICE LIST</u>

Document	Status Holder	Representative
Service	(name, address, & phone number)	(name, address, & phone number)
⊠ U.S. Mail	The Connecticut Light and Power Co. P.O. Box 270 Hartford, CT 06141-0270	Robert E. Carberry, Project Manager NEEWS Siting and Permitting Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-6774 (860) 665-6717 fax carbere@nu.com
☑ U.S. Mail		Jane P. Seidl, Senior Counsel Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5051 (860) 665-5504 fax seidljp@nu.com
□ U.S. Mail		Anthony M. Fitzgerald, Esq. Carmody & Torrance LLP 195 Church Street P.O. Box 1950 New Haven, CT 06509-1950 (203) 777-5501 (203) 784-3199 fax afitzgerald@carmodylaw.com
⊠ E-Mail	NRG Energy, Inc., NRG Power Marketing, Inc., Connecticut Jet Power LLC, Devon Power LLC, Middletown Power LLC, Montville Power LLC, Norwalk Power LLC, and Meriden Gas Turbines, LLC (collective, NRG)	Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29th Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6000 alord@murthalaw.com  Elizabeth Quirk-Hendry General Counsel, Northeast Region NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540-6213 Elizabeth.Quirk-Hendry@nrgenergy.com
	Service  U.S. Mail  U.S. Mail	Service (name, address, & phone number)  □ U.S. Mail The Connecticut Light and Power Co. P.O. Box 270 Hartford, CT 06141-0270  □ U.S. Mail U.S. Mail  □ U.S. Mail NRG Energy, Inc., NRG Power Marketing, Inc., Connecticut Jet Power LLC, Devon Power LLC, Middletown Power LLC, Montville Power LLC, Norwalk Power LLC, and Meriden Gas Turbines, LLC

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Status Granted	Document Service	Status Holder (name, address, & phone number)	Representative (name, address, & phone number)
	⊠ E-Mail	NRG continued	Judith E. Lagano NRG Energy, Inc. Manresa Island Avenue South Norwalk, CT 06854 Judith.Lagano@nrgenergy.com  Raymond G. Long NRG Energy, Inc. P.O. Box 1001 1866 River Road Middletown, CT 06457 Ray.Long@nrgenergy.com  Jonathan Gordon NRG Energy, Inc. P.O. Box 1001 1866 River Road Middletown, CT 06457 Jonathan.Gordon@nrgenergy.com  Peter Fuller NRG Energy, Inc. 270 Cherry Street Bridgewater, MA 02324 Peter.Fuller@nrgenergy.com
Party (granted 02/16/12)	⊠ U.S. Mail	Victor Civie 160 Beech Mt. Road Mansfield, CT 06250 (860) 456-2022	

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# LIST OF PARTIES AND INTERVENORS $\underline{\textbf{SERVICE LIST}}$

	Document	Status Holder	Representative
Status Granted	Service	(name, address, & phone number)	(name, address, & phone number)
Party (granted 03/01/12)	⊠ U.S. Mail	EquiPower Resources Corp., Lake Road Generating Company LP, and Milford Power Company LLP (collectively, EquiPower)	Robert McKay Senior Vice President & General Counsel EquiPower Resources Corp. 100 Constitution Plaza, 10th Floor Hartford, CT 06103 (860) 656-0814 rmckay@eqpwr.com
	☑ U.S. Mail		Jim Ginnetti EquiPower Resources Corp. 100 Constitution Plaza, 10th Floor Hartford, CT 06103 jginnetti@eqpwr.com
	⊠ E- Mail		David W. Bogan, Esq. Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103 (860) 275-8200 (860)275-8299 — fax dbogan@rc.com kbaldwin@rc.com
Party (granted 03/15/12)	⊠ E-Mail	The United Illuminating Company (UI)	Bruce L. McDermott, Esq. UIL Holdings Corporation 157 Church Street P.O. Box 1564 New Haven, CT 06506-0901 (203) 499-2422 (203) 499-3664 Bruce.mcdermott@uinet.com
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