



Carmody & Torrance LLP ■ Attorneys at Law  
Waterbury ■ New Haven ■ Southbury

Anthony M. Fitzgerald  
Partner  
Direct: 203-784-3122  
afitzgerald@carmodylaw.com

*By E-Mail and By First Class Mail*

June 20, 2012

Melanie Bachman, Esq.  
Staff Counsel  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

***Re: Docket No. 424  
The Connecticut Light & Power Company's Application for a  
Certificate of Environmental Compatibility and Public Need for  
the Connecticut portion of the Interstate Reliability Project***

Dear Ms. Bachman,

I write on behalf of the Applicant (CL&P) to provide the Council and parties and intervenors in the above matter with advance notice of a procedural suggestion that CL&P expects to make at the re-convened hearing scheduled for June 26, 2012.

The CL&P witnesses concerning engineering, design, siting, construction, municipal consultations, outreach, EMF, and environmental effects have completed two days of cross-examination, and we expect to resume on June 26<sup>th</sup> with completion of the cross-examination by Richard and Victor Civie. Yesterday, CL&P made several supplemental filings that were promised to the Council in the course of the initial hearings, or requested in the Council's memorandum of June 7, 2012. In addition, CL&P has been advised by the Department of Energy and Environmental Protection (DEEP) that DEEP expects to file comments concerning environmental aspects of the proposed project this week. We expect that Council, parties, and intervenors will have some questions for the panel now testifying with respect to at least some of these filings; and that there will be some re-direct of the CL&P witnesses related to their previous testimony and their testimony on these subjects as well.

Melanie Bachman, Esq.  
Staff Counsel  
Connecticut Siting council  
June 20, 2012  
Page 2

I would expect that the testimony outlined in the previous paragraph will consume all of the June 26 hearing day. However, it is possible that the examinations could conclude on that day, or if not, early on the next scheduled day, which is June 28. That would mean that the only remaining witnesses in CL&P's case would be those concerning Need and System Alternatives. As CL&P has previously advised the Council and the other participants in this docket, the Independent System Operator – New England (ISO-NE) is currently engaged in an updated review of the need for the Interstate Reliability Project, and expects to announce the results of that review by July 9, 2012. Because the methodology and results of this updated analysis have not yet been disclosed, the Need testimony that CL&P has filed is necessarily inconclusive. While any available time on June 28 could be used to cross-examine the Need panel, that effort could be somewhat inefficient and frustrating, since the witnesses would have to defer answers to the most relevant questions. Therefore, should the non-Need evidence conclude or be almost finished at the end of the June 26 hearing, CL&P expects to request that the Council not proceed with Need and System Alternatives witnesses on June 28. The Council might wish to consider cancelling the hearing scheduled for that day; adjourning it early if some portion of the day is required to conclude the testimony of the non-Need witnesses; or using the remaining time for some other purpose.

Assuming that ISO-NE provides the results of the work now underway by July 9, which CL&P fully expects it will, it should be possible to resume with Need testimony in the latter part of July.

I hope that this advance notice of the request CL&P expects to make will be useful to the Council and to the other docket participants.

Very truly yours,

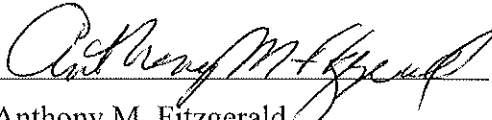
  
Anthony M. Fitzgerald

AMF/kas  
cc: CSC Service List dated June 4, 2012

## NOTICE OF SERVICE

I hereby affirm that a copy of this letter was sent to each Party and Intervenor on the service list dated June 4, 2012, with method of service to each party and intervenor listed via e-mail and U.S. mail on June 20, 2012.

Dated: June 20, 2012

  
Anthony M. Fitzgerald

Robert E. Carberry, Project Manager  
NEEWS Siting and Permitting  
Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270

Andrew W. Lord, Esq.  
Murtha Cullina LLP  
[alord@murthalaw.com](mailto:alord@murthalaw.com)

Raymond G. Long  
NRG Energy, Inc.  
[Ray.Long@nrgenergy.com](mailto:Ray.Long@nrgenergy.com)

Victor Civic  
160 Beech Mt. Road  
Mansfield, CT 06250

Jim Ginnetti  
EquiPower Resources Corp.  
100 Constitution Plaza, 10<sup>th</sup> Floor  
Hartford, CT 06103

John J. Prete  
The United Illuminating Company  
157 Church Street  
New Haven, CT 06506-0901

Victoria Hackett  
Staff Attorney III  
Office of Consumer Counsel  
Ten Franklin Square  
New Britain, CT 06051

Adam N. Rabinowitz, Board Chair  
Mount Hope Montessori School  
[adam@rabinowitzfamily.com](mailto:adam@rabinowitzfamily.com)

Jane P. Seidl, Senior Counsel  
Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270

Elizabeth Quirk-Hendry  
NRG Energy, Inc.  
[Elizabeth.Quirk-Hendry@nrgenergy.com](mailto:Elizabeth.Quirk-Hendry@nrgenergy.com)

Jonathan Gordon  
NRG Energy, Inc.  
[Jonathan.Gordon@nrgenergy.com](mailto:Jonathan.Gordon@nrgenergy.com)

Richard Civic  
43 Main Street  
East Haven, CT 06512

David W. Bogan, Esq.  
Kenneth C. Baldwin, Esq.  
Robinson & Cole LLP  
[dbogan@rc.com](mailto:dbogan@rc.com)  
[kbaldwin@rc.com](mailto:kbaldwin@rc.com)

Edward Hill Bullard  
42 Shuba Lane  
Chaplin, CT 06235

Eric Knapp, Esq.  
Branse, Willis & Knapp, LLC  
148 Eastern Boulevard, Suite 301  
Glastonbury, CT 06033

Anthony M. Fitzgerald, Esq.  
Carmody & Torrance LLP  
195 Church Street  
P.O. Box 1950  
New Haven, CT 06509-1950

Judith E. Lagano  
NRG Energy, Inc.  
[Judith.Lagano@nrgenergy.com](mailto:Judith.Lagano@nrgenergy.com)

Peter Fuller  
NRG Energy, Inc.  
[Peter.Fuller@nrgenergy.com](mailto:Peter.Fuller@nrgenergy.com)

Donna Poresky  
Senior Vice President and  
General Counsel  
EquiPower Resources Corp.  
100 Constitution Plaza, 10<sup>th</sup> Fl.  
Hartford, CT 06103

Bruce L. McDermott, Esq.  
UIL Holdings Corporation  
[Bruce.mcdermott@uinet.com](mailto:Bruce.mcdermott@uinet.com)

Elin Swanson Katz  
Consumer Counsel  
Ten Franklin Square  
New Britain, CT 06051

Keith R. Ainsworth, Esq.  
Evans Feldman & Ainsworth,  
L.L.C.  
[krainsworth@snet.net](mailto:krainsworth@snet.net)