

March 9, 2016

**VIA E-MAIL AND FEDERAL EXPRESS**

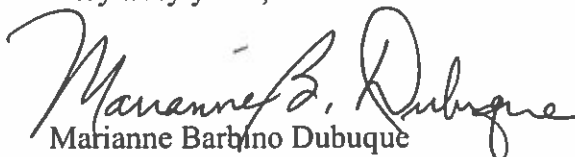
Attorney Melanie Bachman  
Acting Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

Re: **DOCKET NO. 461** - Eversource Energy Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115-kilovolt (kV) bulk substation located at 290 Railroad Avenue, Greenwich, Connecticut, and two 115-kV underground transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements.

Dear Attorney Bachman:

In connection with the above-referenced Docket No. 461, enclosed please find an original plus fifteen (15) copies of Response to the Town of Greenwich's Motion to Require Applicant to Conduct Further Analysis and to Schedule Additional Hearing Dates.

Very truly yours,

  
Marianne Barbino Dubuque

MBD/mkw  
Enclosures

cc: Service List dated February 1, 2016 attached (with enclosures)

LIST OF PARTIES AND INTERVENORS  
SERVICE LIST

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	<input checked="" type="checkbox"/> E-Mail	Eversource Energy	<p>Jacqueline Gardell Project Manager Eversource Energy 56 Prospect Street Hartford, CT 06103 <a href="mailto:jacqueline.gardell@eversource.com">jacqueline.gardell@eversource.com</a></p> <p>John Morissette Project Manager-Transmission Siting-CT Eversource Energy 56 Prospect Street Hartford, CT 06103 <a href="mailto:john.morissette@eversource.com">john.morissette@eversource.com</a></p> <p>Jeffery Cochran, Esq. Senior Counsel, Legal Department Eversource Energy 107 Selden Street Berlin, CT 06037 <a href="mailto:jeffery.cochran@eversource.com">jeffery.cochran@eversource.com</a></p> <p>Marianne Barbino Dubuque Carmody Torrance Sandak &amp; Hennessey LLP 50 Leavenworth Street Waterbury, CT 06702 <a href="mailto:mdubuque@carmodylaw.com">mdubuque@carmodylaw.com</a></p>
Party Approved on July 23, 2015	<input checked="" type="checkbox"/> E-Mail	Office of Consumer Counsel	<p>Lauren Henault Bidra, Esq. Staff Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 <a href="mailto:Lauren.bidra@ct.gov">Lauren.bidra@ct.gov</a></p> <p>Joseph A. Rosenthal, Esq. Principal Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 <a href="mailto:Joseph.rosenthal@ct.gov">Joseph.rosenthal@ct.gov</a></p>

			Margaret Bain Associate Rate Specialist Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 <a href="mailto:Margaret.bain@ct.gov">Margaret.bain@ct.gov</a>
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Parker Stacy 1 Kinsman Lane Greenwich, CT 06830 <a href="mailto:pstacy@optonline.net">pstacy@optonline.net</a>	
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Pet Pantry Super Discount Stores LLC	Mark L. Bergamo, Esq. Edward L. Marcus, Esq. The Marcus Law Firm 275 Branford Road North Branford, CT 06471 <a href="mailto:mbergamo@marcuslawfirm.com">mbergamo@marcuslawfirm.com</a> <a href="mailto:emarcus@marcuslawfirm.com">emarcus@marcuslawfirm.com</a>
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Field Point Estate Townhouses, Inc.	Carissa Depetris Dwight Ueda Field Point Estate Townhouses 172 Field Point Road, #10 Greenwich, CT 06830 <a href="mailto:carissa.depetris@gmail.com">carissa.depetris@gmail.com</a> <a href="mailto:d_ueda@yahoo.com">d_ueda@yahoo.com</a>
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Christine Edwards 111 Bible Street Cos Cob, CT 06807 <a href="mailto:SeeEdwards@aol.com">SeeEdwards@aol.com</a>	
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Richard Granoff, AIA, LEED AP Granoff Architects 30 West Putnam Avenue Greenwich, CT 06830 <a href="mailto:rg@granoffarchitects.com">rg@granoffarchitects.com</a>	

Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Anthony Crudele Bella Nonna Restaurant & Pizzeria 280 Railroad Avenue Greenwich, CT 06830 <a href="mailto:bellanonnagreenwich@gmail.com">bellanonnagreenwich@gmail.com</a>	
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Cecilia H. Morgan 3 Kinsman Lane Greenwich, CT 06830 <a href="mailto:cecimorgan@aol.com">cecimorgan@aol.com</a>	
Intervenor Approved on September 1, 2015	<input checked="" type="checkbox"/> E-Mail	Dr. Danielle Luzzo Greenwich Chiropractic & Nutrition 282 Railroad Avenue Greenwich, CT 06830 <a href="mailto:drdanielleluzzo@gmail.com">drdanielleluzzo@gmail.com</a>	
Intervenor Approved on September 17, 2015	<input checked="" type="checkbox"/> E-Mail	Joel Paul Berger 4208 Bell Boulevard Flushing, NY 11361 <a href="mailto:communityrealty@msn.com">communityrealty@msn.com</a>	
Intervenor Approved on October 1, 2015	<input checked="" type="checkbox"/> E-Mail	Meg Glass 9 Bolling Place Greenwich, CT 06830 <a href="mailto:glass50@hotmail.com">glass50@hotmail.com</a>	
Party Approved on January 12, 2016	<input checked="" type="checkbox"/> E-Mail	The Honorable Peter J. Tesei First Selectman Town of Greenwich 101 Field Point Road Greenwich, CT 06830 <a href="mailto:ptesei@greenwichct.org">ptesei@greenwichct.org</a>	Julie D. Kohler, Esq. David A. Ball, Esq. Cohen and Wolf, P.C. P.O. Box 1821 Bridgeport, CT 06601 <a href="mailto:jkohler@cohenandwolf.com">jkohler@cohenandwolf.com</a> <a href="mailto:dball@cohenandwolf.com">dball@cohenandwolf.com</a>

STATE OF CONNECTICUT

SITING COUNCIL

**DOCKET NO. 461 – EVERSOURCE ENERGY : DOCKET NO. 461**  
**APPLICATION FOR A CERTIFICATE OF : :**  
**ENVIRONMENTAL COMPATIBILITY AND : :**  
**PUBLIC NEED FOR THE CONSTRUCTION, : :**  
**MAINTENANCE, AND OPERATION OF A 115- : :**  
**KILOVOLT (KV) BULK SUBSTATION LOCATED : :**  
**AT 290 RAILROAD AVENUE, GREENWICH, : :**  
**CONNECTICUT, AND TWO 115-KV : :**  
**UNDERGROUND TRANSMISSION CIRCUITS : :**  
**EXTENDING APPROXIMATELY 2.3 MILES : :**  
**BETWEEN THE PROPOSED SUBSTATION AND : :**  
**THE EXISTING COS COB SUBSTATION, : :**  
**GREENWICH, CONNECTICUT, AND RELATED : :**  
**SUBSTATION IMPROVEMENTS : MARCH 9, 2016**

**RESPONSE TO THE TOWN OF GREENWICH’S**  
**MOTION TO REQUIRE APPLICANT TO CONDUCT**  
**FURTHER ANALYSIS AND TO SCHEDULE ADDITIONAL**  
**HEARING DATES**

For the reasons set forth below, The Connecticut Light and Power Company, doing business as Eversource Energy (“Eversource”), hereby requests the Connecticut Siting Council (“Council”) deny the Town of Greenwich’s (the “Town”) motion to require Eversource to conduct further analysis and to schedule additional hearing dates.

Eversource requests the Council’s denial of the Town’s motion for the following reasons:

1. The Town’s filing of its motion on the eve of the sixth evidentiary hearing for this Project is untimely, unduly burdensome and in disregard of the Council’s orderly proceedings;
2. The Town’s reference to Dockets 272 and 217 as a justification for further hearings is an inappropriate comparison to the Docket at issue;

3. Eversource has fully complied with the Council's applicable Application Guides, and the governing statutes (PUESA); and
4. The Town's request will jeopardize Eversource's ability to timely respond to its obligations to reliably provide electric service to its Greenwich customers.

Discussion:

**1. The Town's filing of its motion on the eve of the sixth evidentiary hearing for this Project is untimely, unduly burdensome and in disregard of the Council's orderly proceedings.**

The plan for the Greenwich Substation initially was announced by Eversource in 2011. Since that time, the Town has had ample opportunities to review data and offer its feedback on the proposed project. See Section N, Table N-1 of Eversource Exhibit 1. In fact, in its 2013/2014 Annual Report, the Town contemplated and encouraged a new substation in Greenwich, and reported its focus on working with Eversource "to reinforce the importance of reliable energy to Greenwich residents and businesses..." (Eversource Exhibit 32, p. 8)

Eversource filed its Application with the Council on June 26, 2015. Four days later, on June 30, 2015, the Council sent notice to the Town of its ability to apply for reimbursement up to \$25,000.00 from the Municipal Participation Account Fund if it wished to participate in these proceedings. The Town did not become a party in this matter until January 12, 2016.

Despite having been granted party status, the Town elected not to participate in the Council's evidentiary hearing on January 12, 2016. (Transcript, Jan. 12, 2016). To grant the Town's motion, on the eve of the sixth hearing in this matter, would unduly burden the other interested parties by unnecessarily prolonging the evidentiary process. Further, the Town's motion is in total disregard of the Council's orderly proceedings.

**2. The Town's reference to Docket 272 as a justification for further hearings is not an appropriate comparison to the Docket at issue.**

Docket 272 was an extremely complex docket wherein Eversource (along with United Illuminating) proposed a 345-kV high voltage electric transmission line and associated facilities, plus 3 new substations and modifications to 2 substations. (Docket 272, FOF 1) Docket 272 involved 24 towns. (FOF 8) Moreover, 7 state agencies participated in the proceeding (FOF 9).

Docket 217 was similarly complex. Eversource had proposed a 345-kV high voltage electric transmission line and reconstruction of a 115-kV electric transmission line. (Docket 217, FOF 1) The project involved 8 towns. (Docket 217, FOF 8)

In contrast, this Docket involves 1 substation in 1 town and approximately 2.3 miles of transmission lines. It is fundamentally simple. Any attempt to compare this project to Dockets 272 and 217 is disingenuous.

**3. Eversource has fully complied with the Council's applicable Application Guides, the governing statutes (PUESA).**

Eversource has provided a comprehensive application, along with 44 additional exhibits. Those exhibits include responses to over 280 interrogatories.

Not one party or intervenor has offered expert analysis or testimony during these proceedings. Eversource should not be subject to further requirements where there is absolutely no foundation to support such requests.

**4. The Town's request will jeopardize Eversource's ability to timely respond to its obligations to reliably provide electric service to its Greenwich customers.**

Beginning in 2010, Eversource implemented interim distribution measures as described in Table E-4. These measures served only as a temporary deferral of the current need for this


Project. Currently, there are no additional feasible interim measures at the distribution level that could be undertaken to continue to provide reliable service, other than to build a new substation in Greenwich. Unlike other communities, Greenwich is electrically isolated because the area transmission lines end at Cos Cob Substation and distribution substations that serve a substantial level of Greenwich customer load are fed by distribution feeders that originate at Cos Cob Substation. See Section E-4.3.5, including Table E-4.

The Town's motion prejudices Eversource, but more importantly, places the reliability of electric service to Greenwich customers served by Cos Cob Substation at risk. As set forth in Eversource's application, all distribution fixes have been exhausted, and the time for this project is now.

For the reasons set forth above, Eversource objects to the Town's motion to require Eversource to conduct further analysis and to schedule additional hearing dates for this matter.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY  
DOING BUSINESS AS EVERSOURCE ENERGY

By:   
Marianne Barbino Dubuque  
Carmody Torrance Sandak & Hennessey LLP  
Its Attorneys  
50 Leavenworth Street  
Waterbury, CT 06702  
(203) 573-1200