

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

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.

DOCKET NO. 461

DATE: MARCH 9, 2016

**MOTION TO REQUIRE APPLICANT TO CONDUCT FURTHER ANALYSIS AND TO  
SCHEDULE ADDITIONAL HEARING DATES**

The Town of Greenwich ("Town") files this motion and requests that the Connecticut Siting Council ("Council") require Eversource Energy ("Applicant") to study the feasibility of distribution alternatives, such as those identified to date in this docket. Further, the Town requests that the Council provide additional hearing dates to allow for this analysis to be completed and fully evaluated by the Council and participants in this proceeding.

Attorney General George Jepsen recently filed correspondence with the Council citing this exact proposition. "In the past the Council has directed the applicant to study the feasibility of alternative proposals and has scheduled additional proceedings to consider these findings. See Docket No. 272. I respectfully suggest that the Council may wish to consider such an approach in this case to ensure that any solution in Greenwich is carefully designed to meet demonstrated needs."<sup>1</sup> The Town fully supports Attorney Jepsen's recommendation for the Council to require the Applicant to consider other technical alternatives before approving a project that will have significant

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<sup>1</sup> Correspondence from Attorney General George Jepsen to Attorney Melanie Bachman dated February 29, 2016, p. 2.

impacts to the environment and will impose substantial costs to the ratepayers of Connecticut.

The Applicant filed the above referenced Application for a Certificate of Environmental Compatibility and Public Need on June 26, 2015 (“Application”). In that Application, the Applicant made certain representations as to the need for the installation of a new 115 kV transmission line and substation in the Town of Greenwich, and also claimed bases for the rejection of alternatives.<sup>2</sup> However, Applicant has failed to demonstrate that less intrusive, less costly and more environmentally sensitive distribution alternatives are available, despite the well documented questions from the Town and OCC throughout this Docket. It is clear that further analysis is required before a project of this magnitude is approved.

The Town respectfully requests the Council require the Applicant to fully develop a plan that provides for a distribution solution to address the need the Applicant represents exists in the Greenwich area. Surely, a solution to these issues can be found without the extraordinary cost to Connecticut ratepayers and significant environmental impact that would result from approval of a new transmission line and substation.

It is entirely appropriate for the Applicant to bear the burden of additional studies, and not the Town or any other party or intervenor. No Connecticut municipality can possibly be expected to develop the technical expertise required to refute the Applicant’s position, or to incur hundreds of thousands of dollars in costs to retain experts every time the Applicant files a new application with the Council. Indeed, by statute it is the Applicant who must prove the need for its project; the burden should not be imposed on the Town to disprove it. The only protection for the Town and its precious resources, and for Connecticut ratepayers, is the Council. The Council has the power to insist that the Applicant demonstrate that no other alternative is viable. It is respectfully submitted that the Applicant can do more.

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<sup>2</sup> Application, pp. F1-F18.

Assuming the Council requires the Applicant to perform this analysis, additional hearing dates will be necessary for the Council and parties to evaluate the supplemental information. In the past the Council has scheduled many more hearing dates than the five envisioned for this docket. In Docket 217, the application was filed on October 15, 2001 seeking approval for construction of a \$127 million dollar transmission line project. The Council held 21 hearings, and did not issue its final decision until September 9, 2003.<sup>3</sup> The final project looked quite different from the one submitted in the initial application, after taking into account the environmental impact on the municipalities affected.

In Docket 272, the application was filed on October 9, 2003 seeking approval for construction of a \$604 million dollar transmission line project. The Council held no less than 35 hearings and procedural meetings, and did not issue its final decision until April 7, 2005.<sup>4</sup> Further, the Council re-opened the proceedings and held two supplemental hearings on November 30, 2005 and July 20, 2006 to address specific variations in the siting of the line.

The Town understands the Council's desire for resolution. However, if this record is indeed closed following the March 10<sup>th</sup> hearing, after just five hearing days, this will mark a departure in process from two prior applications for approval of transmission lines and leave many unanswered questions. Because of the magnitude of this project, and the impact on the Town as well as all ratepayers, the Town respectfully requests that the Council make provision for as many hearing dates as necessary such that this project can be implemented in a cost-effective, environmentally compatible, and technically feasible manner. The citizens of Connecticut deserve nothing less.

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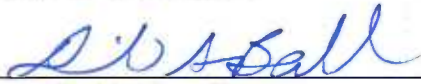
<sup>3</sup> Docket 217 Revised Opinion, dated September 9, 2003.

<sup>4</sup> Docket 272 Opinion, dated April 7, 2005.

The Town respectfully requests the Council grant this Motion.

**Respectfully submitted,**

Town of Greenwich

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day a copy of the foregoing was delivered by electronic mail to all parties and intervenors of record, as follows:

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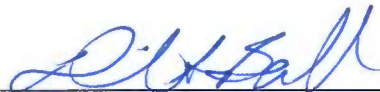
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