

- c. Provide the estimated kWh rates for transmission and distribution for CL&P ratepayers by rate class. The revenue requirements should include all taxes, including grossed up requirements for all federal and state income taxes. Provide estimated total usage by rate class, and demonstrate how the rates cover the revenue requirement.

OCC-67 Reference Response to OCC-31, including attachment.

Based on the response, it appears that the Company's peak demand forecast for Cos Cob was calculated beginning with the actual peak demand for 2013, the highest peak demand of the six years (2011– 2015) listed. The actual 2013 peak was then increased by a compounded 1% per year for the years 2014, 2015 and 2016 to derive a forecast of 134.4 MVA for 2016. The actual peaks for 2014 and 2015 were ignored. For the years 2017 through 2022, the Company continued to increase the peak demand forecast by a compounded 1% each year.

The response does not indicate that the forecast is based on normal weather or any analysis of cooling degree days, or any weather normalization calculations, or any specific look at energy efficiency measures in Greenwich, past, present or future.

Rather, the response states that the forecast is based on "the hot temperatures and high heat indices that occurred during the 2013 summer." The response also does not indicate that the compounded 1% increase per year forecast is based specifically on Cos Cob usage.

In light of the response to OCC-31:

- a. Explain the following Company testimony from the October 6, 2015 hearing transcript ("Tr.") at 52 and 157:

MR. ASHTON: Okay. We talked a bit about the peak load at Cos Cob. I assume that's all weather normalized. Is that fair to say?

THE WITNESS (Bowes): Yes, it is.

MR. ASHTON: And what are the conditions on when you, quote, weather normalize?

THE WITNESS (Bowes): I don't know specifically. I know we use multiyear average, in this case a three-year average. (Tr. at 52)

And

MR. ASHTON: I want to make sure we haven't got Russians numbers here. I asked you earlier about the 135.5 peak on Cos Cob in 2017.

You answered that was weather, a weather normalized peak. Remember?

THE WITNESS (Bowes): Because it's forecasted, yes. (Tr. at 157)

- b. Explain how the Company's forecast basis relates to normal weather and to the Cos Cob peak demand. Provide the Company's definition of weather normalization.
- c. Explain the low usage numbers for the 2010 Annual Usage MWh.

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- OCC-68 Reference the response to OCC-32. Is there a standard for how far away from Greenwich the responder is who is dispatched to respond to substation incidents? Does the Company always have a responder within 15 minutes, 20 minutes, or some other arrival time to the Greenwich substation?
- OCC-69 Explain the Company's view on the pros and cons of high pressure gas-filled cable. Has the Company ever used this type of cable?
- OCC-70 What is the narrowest Metro North Railroad ("MNRR") right of way in which the Company has: distribution poles; other distribution infrastructure; transmission poles; other transmission infrastructure; and 115 kV transmission poles or infrastructure? What is the smallest radius of clearance in which the Company has the same categories of infrastructure within the MNRR? For each category, describe the infrastructure and the location.
- OCC-71 Reference response to OCC-53. Explain why the overhead route through the Greenwich Avenue historic district was deemed not viable.
- OCC-72 Reference response to OCC-61. The response is missing an answer to this piece of the interrogatory: "Explain in detail all assumptions on geologic conditions used in the estimates, and the basis for each such assumption." Provide the missing answer.

Respectfully submitted,
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I hereby certify that a copy
of the foregoing has been mailed,
electronically filed, and/or
hand-delivered to all known
parties and intervenors of record, this
22nd day of December 2015.

Lauren H. Bidra
Lauren H. Bidra
Commissioner of the Superior Court