



applying to that 2-year average, the average percentage of the total used by the 11R-1X transformer in 2013 and 2014. Then, the Company added the calculated estimate for usage for the 11R-1X to the actual usage for the other two transformers.

First, OCC objects to the Company's attempt to use 2013 and 2014 data -- i.e., the two-year usage average, and the 11R-1X transformer's average usage percentage of the 2013 and 2014 total usage -- in an estimate for 2015. In asking for the actual usage information requested in Original LF-20, OCC is seeking just that -- actual 2015 information. A 2015 estimate, especially one based on prior years' data, is not an appropriate or useful substitute for actual Cos Cob usage.

OCC notes that, in addition to an estimate being inappropriate and not useful, the Company did not disclose the numbers it used in estimating the 11R-1X transformer usage in Revised LF-20. The Company also did not disclose the actual 2015 usage for the other two Cos Cob substation 27.6 kV transformers.

Second, OCC objects to the Company's estimate on reasonableness grounds. OCC performed the following reasonableness check on the Company's estimate:

Revised LF-20 total 2015 kWh	484,235,481
Original LF-20 total 2015 kWh	<u>457,879,975</u>
Difference	26,355,506 additional kWh in Revised LF-20

Based on the Company's revised filing, it is OCC's understanding that the additional 26.36 million kWh (rounded) would be the Company's estimate of the allegedly missing 1.5 months of usage for the 11R-1X transformer. Since the period in question (September 13 – November 1) is not in the summer or winter peak periods, then it would be very conservative to use it as an average usage period to calculate the annual usage for the 11R-1X, but even so, it would yield the following:

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Dividing the 26,355,506 additional kWh by 1.5 months yields:

17,570,337 average monthly usage.

Multiplying 17,570,337 times 12 months yields:

210,844,048 estimated annual 2015  
usage for 11R-1X.

The above conservatively calculated usage of 210.8 million kWh (rounded) -- derived based on the Company's revised total in Revised LF-20 -- would be more than double the annual usage of 101.6 million (rounded) in 2013 (see Response to OCC-22) for the 11R-1X and 1.8 times the usage of 116.9 million in 2014 (id.). The Company has provided no explanation for such an outsized difference from 2013 and 2014 in the 2015 usage of this one transformer.

On the above grounds, the OCC objects to the Company's Revised LF-20, and requests that the Council reject the Revised LF-20.

Respectfully submitted,  
OFFICE OF CONSUMER COUNSEL  
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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  
9th day of March 2016.

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