

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

RE: EVERSOURCE ENERGY APPLICATION FOR A : **DOCKET NO. 461**
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 LINES EXTENDING :
APPROXIMATELY 2.3 MILES BETWEEN THE PROPOSED :
SUBSTATION AND THE EXISTING COS COB :
SUBSTATION, GREENWICH, CONNECTICUT, AND :
RELATED SUBSTATION IMPROVEMENTS. : **MARCH 10, 2016**

**THE OFFICE OF CONSUMER COUNSEL'S RESPONSE TO TOWN OF
GREENWICH MOTION FOR FURTHER ANALYSIS**

The Office of Consumer Counsel ("OCC") supports the Town of Greenwich ("Town") in its Motion dated March 9, 2016, regarding further analysis and hearing in Docket No. 461 ("Motion").

The OCC shares the Town's serious concerns about the project proposed by The Connecticut Light and Power Company d/b/a Eversource Energy ("Company") in this Docket No. 461 proceeding regarding the lack of substantiation, and the lack of detailed exploration of alternatives in the Company's filings. The OCC's areas of focus in the instant proceeding are the reliability, cost, safety, and the need for the magnitude of the proposed project. Both the Town and OCC seek to explore better alternatives that address the level of need in Greenwich.

The Town Motion mentions precedent Siting Council ("Council") cases, such as Docket Nos. 217 and 272. Both these cases are cited because the Council took care to take additional time to explore the impact and alternatives to the projects proposed by the

STATE OF CONNECTICUT, OFFICE OF CONSUMER COUNSEL
TEN FRANKLIN SQUARE, NEW BRITAIN, CT 06051-2644
PHONE: (860) 827-2900 --- FAX: (860) 827-2929 --- INTERNET: <http://www.ct.gov/occ>

Applicant in these proceedings. Had the Company provided well-substantiated alternatives that address the level of need, then the Town's Motion would have been unnecessary. As it stands, the Company has not even responded fully to information requests made in the proceeding. For example, the Company was asked about an alternative involving serving North Greenwich from the Cedar Heights substation in Stamford. In its response in LF-21, the Company stated that distribution feeders would cost \$135 million – no breakdown, no details of this large dollar amount; in its estimate, it also appears that the Company may have planned for undergrounded, rather than overhead, distribution, but again, there is no explanation.

The OCC does not believe that the Company has demonstrated that its proposal is the best alternative to respond to the level of need it has identified in the proceeding. OCC supports the Town Motion for further analysis and hearings.

Respectfully submitted,
OFFICE OF CONSUMER COUNSEL
ELIN SWANSON KATZ,
CONSUMER COUNSEL

By: Margaret Bain
Margaret Bain
Associate Rate Specialist

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 10th day of March 2016.

Joseph A. Rosenthal
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Commissioner of the Superior Court