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Joaquina Borges King Senior Counsel Legal Department

April 28, 2011

Mr. Robert Stein Chairman CT Siting Council Ten Franklin Square New Britain, CT 06051

RE: Petition No. 980 - BNE Energy, Inc. Petition for a Declaratory Ruling That No Certificate of Environmental Compatibility and Public Need is Required for the Construction, Maintenance, and Operation of a 3.2 MW Wind Renewable Generating facility located at 178 New Haven Road, Prospect, Connecticut

Dear Chairman Stein:

The Connecticut Light and Power Company ("CL&P") hereby respectfully submits these edits to the Proposed Findings of Fact issued by the Connecticut Siting Council ("Siting Council") on April 19, 2011. Since the Siting Council's Proposed Findings of Fact make no mention of CL&P's position or comments regarding its telecommunications equipment, the Company recommends the following additions to the Proposed Findings of Fact.

- 1. CL&P owns property, adjacent to the location of the proposed project, located at 18 Kluge Road, Prospect, CT. CL&P has telecommunications equipment sited on its property, which is adjacent to the proposed project site.
- 2. Pursuant to the Siting Council's ruling on March 31, 2011, CL&P filed a supplement with the Siting Council relative to its interests in the Petition on April 7, 2011.
- 3. CL&P's telecommunications infrastructure supports CL&P's, and its other operating company affiliates, field operations, emergency restoration, and equipment operation and control. CL&P's existing telecommunications facilities include:

a. Field Operation Communication Equipment:

- Radio transceiver in the 37 megahertz ("MHz") range for mobile communications including meter, service and line operations;
- Radio transceiver in the 48 MHz range for mobile communications including meter, service and line operations; and
- Radio transceiver in the 154 MHz range for internal paging of employees;

b. Equipment Operation, Supervisor Control and Data Acquisition (SCADA):

- Radio transceiver in the 450 MHz range used for remote control/restoration of the electrical system;
- Radio transceiver in the 935 MHz range used for remote control/restoration of the electrical system;

c. Systems Operation Control:

• Two microwave paths in the upper 6 gigahertz ("GHz") band (around 6.7 GHz) which carry administrative and electrical system operational information, as well as information provided to the Independent System Operator of New England ("ISO-NE") for regional system operations.

d. Municipal Public Safety:

- The Town of Prospect Fire Department radio equipment is also installed on CL&P's telecommunications infrastructure.
- 4. CL&P is concerned the wind turbines will diminish or impact CL&P's ability to expand the utilization of the telecommunication tower or to maximize use of its facilities in the future, including both microwave paths and proposed 220MHz SCADA
- 5. CL&P's telecommunications engineers' group have been unable to conclusively determine whether the project will present reflective/multipath interference problems for frequencies from 37 MHz through 935 MHz.
- 6. CL&P has hired an independent telecom/technology firm to perform a study of the Petitioner's project relative to possible interference to all of CL&P's communications at this proposed site.
- 7. But for the Petitioner's project, CL&P would not have to perform an interference study of the proposed project's impact on CL&P's communications, or bear the cost of the same.
- 8. The Petitioner has not performed any analysis or cited to any studies that are conclusive that there will be no interference or impact on CL&P's communications.

9. With regards to Proposed Finding of Fact #61, delete the phrase, "an agreement with CL&P to provide power on to the electrical distribution system," and add following italicized language:

"The electrical interconnection of the wind turbines would be subject to CL&P and UI Guidelines for Generator Interconnection approved by the Department of Public Utility Control."

Respectfully submitted,	
Joaquina Borges King	
Senior Counsel	
Counsel for CL&P	

CERTIFICATION

A copy of the foregoing was sent by first class mail to the following parties of record on this __ day of April, 2011:

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