

**CONNECTICUT SITING COUNCIL**

<b>DOCKET NO. 426 – Third Taxing</b>	<b>:</b>	<b>DOCKET 426</b>
<b>District Electric Department</b>	<b>:</b>	
<b>application for a Certificate of</b>	<b>:</b>	
<b>Environmental Compatibility and</b>	<b>:</b>	
<b>Public Need for the construction,</b>	<b>:</b>	
<b>maintenance, and operation of a</b>	<b>:</b>	
<b>proposed 115-kV transmission</b>	<b>:</b>	
<b>connection and expansion of the East</b>	<b>:</b>	
<b>Avenue Substation located at 6 Fitch</b>	<b>:</b>	
<b>Street, Norwalk, Connecticut</b>	<b>:</b>	<b>August 3, 2012</b>

**THE CONNECTICUT LIGHT AND POWER COMPANY’S  
COMMENTS ON DRAFT FINDINGS OF FACT**

On July 27, 2012, the Connecticut Siting Council ("Council") issued its draft Findings of Fact ("Draft Findings") in this Docket regarding the Norwalk Third Taxing District Electric Department's ("TTD's") application for a Certificate of Environmental Compatibility and Public Need for its proposed expanded substation at 6 Fitch Street in Norwalk, Connecticut. The Connecticut Light and Power Company ("CL&P") is participating as a party in this Docket because CL&P would construct, own, operate and maintain the interconnection facilities to connect its existing 115-kV transmission circuit (the 1416 Line) to the TTD's proposed expanded substation. CL&P's proposed interconnection facilities are needed for the operation of TTD's proposed substation; they are part of the overall project that is proposed in this Docket. See TTD 1 at 2, 6; June 14, 2012 Hearing Transcript (afternoon session) ("Tr. ") at 34.

CL&P has the following comments on the Draft Findings:

1. Finding No. 21 has a minor typographical error in the parenthetical reference to CL&P's two underground distribution circuits that currently supply power to TDD and its

customers. This parenthetical refers to "9S-45 and S-46 circuits". This reference should be corrected to "9S-45 and 9S-46 circuits". See TTD 1 at 7; TDD 3, R.4.

2. Finding No. 22 explains that "[Ongoing] maintenance and service issues associated with other CL&P customers frequently cause outages on one of the [two CL&P] circuits, leaving only one to supply power to TDD." The following finding (Finding No. 23) then states: "The frequent out-of-service condition does not allow TTD to operate a reliable system." CL&P observes that, in the years 2007 to 2012, there were zero (0) hours when both of these circuits were out-of-service simultaneously. See TTD 3, R.4.

Consequently, CL&P submits that the Draft Findings should be revised to clarify that outages on either of the two circuits supplying power to TDD (as experienced over the past several years) may threaten the reliability of service to TDD's customers, particularly if TDD experiences the load growth that it expects from a couple new large customers. The interconnection to CL&P's 115-kV system is simply a more reliable source of service than the 27.6-kV system, some portions of which are more than sixty years old. See TDD 1 at 1-2.

3. Finding No. 36 – There is a minor typographical error in this finding. It refers to "CL&P's 115-kV no. 1415 transmission line." That reference should be corrected to "CL&P's 115-kV 1416 Line." See TDD 1 at 2.

4. Finding No. 42 – Minor revisions to the wording of this finding would serve to clarify the description of CL&P's transmission line interconnection facilities. The transmission structures described in the second sentence of this finding are the same two 90 degree

dead end structures described in the first sentence and the CL&P line is the 1416 Line rather than the 1415 Line. See TDD 1 at 6; CL&P 2 at 1. Consequently, the second sentence should be revised to state: "These two new 115-foot tall structures would loop CL&P's 1416 Line through the substation." In addition, the following two sentences should be revised as shown below to clarify that the referenced existing steel pole transmission structure southeast of the substation may be removed depending on whether it is needed to support the interconnection. See CL&P 2 at 1.

An existing 115-foot monopole transmission structure located southeast of the substation may be removed to provide adequate clearance for the new angle structure. However, CL&P is analyzing whether it is necessary to retain this existing structure as part of the interconnection.

CL&P appreciates the opportunity to participate in this Docket and to submit these comments.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY

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cc: Service List