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July 31, 2001
77 Walter Ave.
Norwalk, Ct. 06851

Mr. Joel Rinebold, Executive Director
Institute for Sustainable Energy
83 Windham Street
Willimantic, CT 06226

Dear Joel:

Per your request enclosed is a copy of my position papers on the Bethel to Norwalk
Power Transmission Line. Public Act 02-95 Executive Order 26.

If you have any questions, don't hesitate to call me.

Sincerely,



Larry Rossi

**Position Paper on Northeast Utilities' Proposed 345 kV Transmission Line
in Southwest Connecticut**

The towns of Norwalk, Wilton, Weston, Bethel and Redding, do not contest the need for more access to power in Southwest Connecticut (SWCT). SWCT is a congested region because of its location, inadequate transmission lines flowing into the region, insufficient local generation, and limited conservation and load management programs. These problems do pose a threat to consumers throughout New England, as they are forced to bear the costs of transmission congestion uplift payments and loss of load probabilities that are much higher than industry standards. The probability of loss of load is mitigated by exercise of Operating Procedure 4, and there is always the possibility that load shedding may be required. However, there is certainly the economic impetus to "market" the congestion of the region, which results in higher prices to customers. Something must be done in an efficient and economic manner to put an end to the congestion and bottlenecking of power that causes higher prices to consumers. The towns encourage the State to examine all possible solutions to the problems in the region, and to choose the most effective, economic, and reliable resolution.

Independent studies conducted by the ISO-NE affirm the need for more transmission to SWCT and also show that nominal amounts of generation in critical areas can substantially help to alleviate congestion. Therefore, as Connecticut Attorney General Richard Blumenthal testified, only a multi-pronged approach will effectively and successfully address the problems. He argues that in addition to improved and increased transmission infrastructure, SWCT must implement distributed generation as well as aggressive conservation and load management programs.

Northeast Utilities (NU) has put forth a proposal for the construction of a 345 kV line that would run from Bethel to Norwalk. They contend that the incentive for

building the line is the transmission congestion in SWCT, and that after completing a number of studies, the 345 kV line is the best option. Limited research on NU's proposed line done by independent experts indicates that it would be greatly underutilized for a very high percentage of the time. Also of note is the fact that this line alone does not relieve the SWCT problems, a full solution relies on completion of the 345 "loop" that, as proposed, would further tie the Norwalk-Stamford area to New Haven and back to Middletown. The Towns and the Attorney General contend that while this plan would certainly resolve the congestion issue, it would do so at an economic and environmental cost that is excessive when compared to possible alternatives.

Testimony of an expert witness given before the Siting Council on behalf of the CT Attorney General not only affirms that the first line of this plan, the Bethel to Norwalk line, would be underused, but addresses the methodological flaws and manipulations in NU's research, the underlying motivations behind the construction of such a large line, and the alternative solutions that would adequately address the problems in SWCT. The witness also pointed out that NU's proposed placement of the line on the same structures that currently support the 115 kV line that feeds the area poses a real threat to reliability as they would overload remaining lines if an outage were to occur.

Despite assuming a very high demand, NU presumes that no new sources of generation will be produced, and that there will be no in-service generation in Norwalk. In other words, NU conducted its studies using excessively high numbers for load forecasts and irrationally low numbers for available generation, making the situation appear more dire and in need of a larger transmission line. The expert witness argued that even if the load forecast used by NU is applied, the 345 kV loop will be underutilized, with usage varying from 2% - 14% of its total capacity.

The witness asserted that the motivation behind constructing the line does not lie in a simple desire to alleviate transmission congestion in SWCT, but in a complex scheme to build a submarine line to Long Island which will be used to sell power in the lucrative Long Island and New York City markets. The line from Bethel to Norwalk is only the first part of a loop that NU wants to build which will allow for the construction of the underwater line. Ironically, most of the costs for this loop will be borne by New England consumers, while the profits from the sales to New York will be seen only by Generators, New Yorkers and NU stockholders. (not sure about this, since Transmission is regulated wouldn't revenues go to offset costs to consumers or is that not model???)

Finally, the expert put forth an alternative that would address the transmission congestion in SWCT in a more environmentally friendly, economic, and effective way. He recommends the reinforcement of existing 115 kV circuits from Devon to Norwalk and from Pequonnock to Norwalk as well as the addition of a 115 kV underground cable from Plumtree to Norwalk.

The towns agree that there must be something done to address the transmission and generation problems in SWCT. The towns believe that the study of alternative resolutions should be broadened significantly and have in fact, proposed adding even more transmission capability than that proposed by the Attorney General's Office. Using the data supplied by CL&P, the expert retained by the four towns has documented that the addition of two 115kV lines underground (in the public roadway) would provide enough capacity to meet electrical demand until 2017. The towns recommend the following:

- The Siting Council hire an independent entity with expertise in transmission modeling, in particular, short circuit, thermal loading, and stability analysis. Companies such as The Shaw Group, EPRO, GE, and Westinghouse, as well as other companies under engagement to ISO

New England for such studies, are qualified companies to undertake such an effort.

- The Siting Council should assess NU the cost of this independent analysis.
- The analysts should consider the scenarios of additional generation in strategic locations that have a reasonable chance of development coupled with lower voltage transmission as an alternative solution. Suggested generation options should include up to 100 MW in Norwalk and Stamford areas.

The Task Force should also investigate the following:

- If the 345 kV line were to be built and connected to Long Island, what is the feasibility of establishing a special assessment on the power sold in the lucrative New York markets to provide reimbursement/compensation to affected communities in particular and to Connecticut rate payers in general ?
- Assuming a design basis of 25 years, what is the most economic and/or most environmentally benign solution to the SWCT power supply problem? The investigation should consider transmission, generation, and load management/conservation in fashioning a preferred solution.

Task Force Member

Larry Rossi

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August 8, 2002 update