

Docket F-2008  
Pre-Hearing Interrogatories

**For CL&P, CMEEC, and UI:**

- CEAB 1. Please provide a detailed description of the methodology by which the energy and peak load forecasts contained in your initial filing in this proceeding were prepared.
- CEAB 2. Please provide your Normal weather and economic activity (“50/50”) 2008-2017 forecast without Conservation and Load Management impacts from continued funding or implementation of programs in the period 2008-2017 and no reductions from anticipated distributed generation from the Department of Public Utility Control’s DG Grant Program for (a) total systems energy requirements and (b) summer peaks.
- CEAB 3. Please provide the number of MW and customers in your service territory that are currently enrolled in ISO-NE Demand Response Programs.
- CEAB 4. Please provide the number of MW and customers in your service territory that (a) cleared in FCA1 as a real-time demand response or profiled response customer, or (b) cleared in FCA1 as an other demand resource (ODR) customer.
- CEAB 5. Please describe and show the calculations underlying the load factor forecasts found in CL&P’s Table 2-1, UI’s Exhibit 1, and CMEEC’s Table I.
- CEAB 6. Please indicate whether the load factor forecasts found in CL&P’s Table 2-1, UI’s Exhibit 1, and CMEEC’s Table I are an input (along with energy requirements) to the peak forecasts or our an output of the summer peak forecasts.
- CEAB 7. Please indicate which of the transmission improvements described in your initial filings in this proceeding are to serve planned or anticipated generating facilities.
- CEAB 8. Please provide a copy of your ten-year plan for infrastructure improvements in Connecticut.

**For CL&P:**

- CEAB 9. Please provide the forecast of conservation and load management (CL&M) impacts from “a ramp-up in spending consistent with the Act,” as referenced on page 15 of your March 3, 2008 filing, or implementation of programs in the period 2008-2017 on (a) total system energy requirements and (b) summer peaks. Provide data in the following form: total CL&M, conservation impacts only, and load management impacts only.

CEAB 10. Please provide the values for “associated losses” referenced on page 3 of your March 3, 2008 filing.

CEAB 11. Please provide any calculations that were used to determine that “the primary difference between the ISO-NE and CL&P forecasts is the treatment of C&LM and DG” as noted on page 5 of your March 3, 2008 filing.

CEAB 12. Please provide any supporting calculations or analyses for the statement, “Meeting RPS and the RGGI will require looking beyond New England for low-emissions, renewable resources,” as noted on page 22 of your March 3, 2008 filing.

CEAB 13. Please indicate whether the 265 MW of “New Owned Peaking Generation” noted on page 6 of your March 3, 2008 filing was included in the “279 MW of new combustion turbines to meet the fast-start requirement” described in the Integrated Resource Plan submitted to the CEAB on January of 2008.

**For UI and CL&P:**

CEAB 14. Please compare your assumptions for CL&M impacts in both your 50/50 and 90/10 cases, in terms of GWh and peak MW savings, to the reference and DSM-focus levels described in the electric distribution companies’ Integrated Resource Plan submitted to the CEAB on January 2, 2008.

CEAB 15. Please provide the forecast of impacts resulting from distributed generation projects for which the Department of Public Utility Control has approved grants pursuant to the DG Grant Program in the period 2008-2017 on (a) total system energy requirements and (b) summer peaks . Please provide a list of the DG units and their anticipated in-service dates.

**For UI and CMEEC:**

CEAB 16. Please provide the forecast of conservation and load management (C&LM) impacts from continued funding or implementation of programs in the period 2008-2017 on (a) total system energy requirements and (b) summer peaks. Provide data in the following form: total C&LM, conservation impacts only, and load management impacts only.

**For UI:**

CEAB 17. Please provide the “loss factor” referenced on page 5 of your April 10, 2008 filing that was applied to the Company’s sales forecasts in order to develop the system requirements forecast.

CEAB 18. Please submit a copy of the Integrated Resource Plan completed by the electric distribution companies and submitted to the CEAB in January 2008 as referenced on page 9 of your April 10, 2008 filing.

CEAB 19. Please provide the forecast of conservation and load management (CL&M) impacts from funding or implementation of programs in the period 2008-2017 that would support “aggressive levels of DSM savings,” as stated on page 10 of your April 10, 2008 filing on (a) total system energy requirements and (b) summer peaks. Provide data in the following form: total CL&M, conservation impacts only, and load management impacts only.

CEAB 20. In relation to the statement on page 12 of your April 10, 2008 filing concerning the development of in-state renewable resources, please indicate the renewable projects that have been selected to date for long-term contracts under Project 150, including their planned capacity and in-service dates.

CEAB 21. Please indicate whether the 500 MWs of fast-start peaking units submitted by UI and NRG in March 2008, pursuant to Docket No. 08-01-01, was included in the “279 MW of new combustion turbines to meet the fast-start requirement” described in the Integrated Resource Plan filed with the CEAB in January of 2008, noted on page 9 of your April 10, 2008 filing.

**For CMEEC:**

CEAB 22. Please indicate whether the forecasts in Table I correspond to normal (“50/50”) weather and economic activity conditions or extreme (“90/10”) weather and economic activity conditions.

CEAB 23. Please indicate whether the forecasts in Table I assume power production from the facilities in Table VII.

**For GENERATORS (including: AES Thames; Dominion; Bridgeport Energy; FirstLight Power; Lake Road; Milford Power; PPL Wallingford; PSEG Power; NRG Energy; and CRRA):**

CEAB 24. Please indicate which of your Company’s existing facilities cleared in the first FCM auction.

CEAB 25. Please provide your Company’s estimate for planning processes of the on-going annual revenue level required for continued operation of each facility. Please indicate whether your Company believes the ISO-NE’s Forward Capacity Market auctions will provide sufficient capacity revenues.

CEAB 26. Please indicate for each of your existing facilities assuming that there will be no RMR agreements after 2009 :

- a. The anticipated retirement date, if applicable, in the 2008-2017 time period;
- b. The impact(s) of increased emission control, specifically reducing by 20% and then a total of 50% of the allowable NOx emissions on a BTU basis, on equipment investment and economic retirement decisions.

CEAB 27. Please indicate which of your planned generating units or expansions of existing units cleared in the first FCM auction? Provide the amount (in MW) that cleared for each facility.

CEAB 28. Please indicate which of your Company's existing or planned generating units or expansions of existing units (and the MW of each facility) submitted show of interest (SOIs) forms for participation in the second FCM auction?

**For ISO-NE:**

CEAB 29. Please explain why the CT value for 2007 actual energy from CELT 2008 of 33,947 GWH is 2.5% higher than the sum of the 2007 actual net electrical energy output requirements as reported by CL&P, UI, and CMEEC.

CEAB 30. Please submit the following documents for the record in this proceeding:

- a. 2008 ISO Load Forecast Reports
- b. 2008 CELT Report,
- c. System Studies regarding NEEWS and other CT transmission projects
- d. FCA1 results.