

# WOODLANDS COALITION



Connecticut Energy Advisory Board  
c/o Gretchen Deans, CERC  
805 Brook St.  
Bldg. 4  
Rocky Hill, CT 06067

Dear CEAB,

Thank you for this opportunity to comment on a CEAB RFP process re NEEWS. The Woodlands Coalition would like to recommend a double-pronged alternative to NEEWS: one enhancing opportunities for DG, and another managing load (aka demand resource management). Neither one is a direct transmission solution, but both address the problem from "upstream" rather than "downstream." Briefly, we first make points about two other possible approaches, and then focus on the alternative we recommend.

1. *Merchant transmission.* Since NEEWS is a major transmission project, one's initial reaction might be to solicit a proposal re merchant transmission. That is unlikely to work, however. Unlike merchant power plants, merchant transmission doesn't seem to be feasible in CT, given the density of the population, the cost of ROWs, and significant permitting issues. Moreover, NEEWS covers portions of three states, and must integrate with major transmission infrastructure already in place. The physical constraints of integration, not to mention the business constraints, plus the administrative constraints of working under ISO-NE—all make the merchant transmission solution impractical.

2. *New transmission technology.* Piloting or installing new transmission technology (new materials for conductors, storage devices, data acquisition and control software and hardware, etc., etc.) probably would work as an alternative, but the utilities are unlikely to offer this sort of solution without competition (i.e. merchant transmission), which has been judged impractical (see above). Or, rather, the utilities might offer this sort of solution in an effort to cut costs for transmission throughout the system, long-term, but they would not offer it as an alternative to a particular transmission expansion project such as NEEWS.

3. *DG and load management/demand resource management.* Neither of these approaches is sufficient in itself, but both together, we believe, can accomplish major reliability improvements. Both, too, support investment in renewable energy resources and fulfill state and regional Renewable Portfolio Standards. Both are in synch with the legislature's state energy policy because they represent large-scale forms of energy efficiency. Per the assessment of many energy economists, dollars spent on energy efficiency go four times as far as dollars spent on accommodating status quo energy use via transmission and generation. Finally, DG and load management/demand resource management is already the trend. Just as states have been out ahead of the federal government on adopting new energy policies, so businesses, out ahead of the state, have settled on DG and load management/demand resource management as their solutions of choice. Lagging behind businesses, but still following the same route, are individual ratepayers. If the CEAB wants to find an alternative to NEEWS, perhaps it should credit the trend. The Woodlands Coalition respectfully suggests that the best leaders are not the ones who run far ahead of the pack, crying "Follow me", but the ones who stay in the midst of the pack, managing most effectively the energy and know-how of their peers.

Sincerely,

A handwritten signature in black ink, appearing to read "Ruth Ann Wiesenthal-Gold". The signature is fluid and cursive, with a large initial "R" and "W".

Ruth Ann Wiesenthal-Gold  
The Woodlands Coalition