

**CENTRAL MAINE POWER COMPANY  
OBJECTION TO COMPETITIVE ENERGY SERVICES' DATA REQUEST NO. 8  
DOCKET No. 2008-255**

January 14, 2010

**CES-08-01**

- Q.** Please provide the following information in electronic format with respect to all the substations in the CMP system:
- a. The substation name
  - b. The substation ID in the CMP database
  - c. The circuits interconnected to these substations by CMP circuit number
  - d. For each circuit please provide the following information
    - i. The circuit rating per ISO-NE Operating Procedure 16A.
    - ii. The from and to pole numbers of these circuits in the CMP database
    - iii. The GPS locations of these poles
  - e. The GPS location of each substation
  - f. Substation ownership (i.e. CMP or name of third party owner)
  - g. A description of the current status of metering and ct/pt configuration at each substation or circuit
  - h. A description of the remote monitoring, radio, microwave, SCADA, or other data communications available at each substation
  - i. An indication as to whether single phase power is currently available or readily attainable at each substation
- A.** CMP objects to this request on the grounds that it is unduly burdensome and requests information that is confidential and proprietary. The information requested is voluminous and producing the requested information would be onerous. CMP is not in a position to know what information would be necessary or useful as those terms are used in this request. Finally, the requested information involves data which is confidential (including CEII) and proprietary.

CMP also objects to this request on the grounds that it seeks information not relevant to the subject matter involved in the pending action. While detailed substation information of the type requested in CES-08-01 may be of interest to a public utility that has been granted the right to operate in CMP's service territory, it is not relevant to establishing the need for MPRP or an alternative to MPRP, which is the subject matter of Docket No. 2008-255.

**Objection Prepared and Submitted By:**  
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Counsel