



# CONSERVATION LAW FOUNDATION

**ELECTRONICALLY FILED ON SEPTEMBER 17, 2008**

Karen Geraghty  
Administrative Director  
Public Utilities Commission  
18 State House Station  
Augusta, Maine 04333-0018

**RE: CENTRAL MAINE POWER CO. & PUBLIC SERVICE OF NEW HAMPSHIRE  
Request for Certificate of Public Convenience & Necessity for the Maine Power  
Reliability Program Consisting of the Construction of Approximately 350 Miles of 345  
kV Transmission Lines, Docket No. 2008-255**

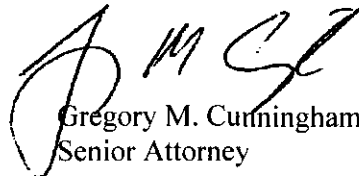
**THIS IS A VIRTUAL DUPLICATE OF THE ORIGINAL HARDCOPY  
SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH  
ITS ELECTRONIC FILING INSTRUCTIONS**

Dear Ms. Geraghty,

Enclosed please find an original and one copy of the First Set of Data Requests of Intervenor Conservation Law Foundation regarding the above-referenced proceeding.

Copies have been sent to all parties on the service list.

Very truly yours,



Gregory M. Cunningham  
Senior Attorney

cc: Service List

14 Maine Street, Brunswick, Maine 04011-2026 • 207-729-7733 • Fax: 207-729-7373 • [www.clf.org](http://www.clf.org)

MASSACHUSETTS: 62 Summer Street, Boston, Massachusetts 02110-1016 • Phone: 617-350-0990 • Fax: 617-350-4030

NEW HAMPSHIRE: 27 North Main Street, Concord, New Hampshire 03301-4230 • 603-225-3060 • Fax: 603-225-3059

RHODE ISLAND: 55 Donance Street, Providence, Rhode Island 02903 • 401-351-1102 • Fax: 401-351-1130

VERMONT: 15 East State Street, Suite 4, Montpelier, Vermont 05602-3010 • 802-223-5932 • Fax: 802-223-0060



# CONSERVATION LAW FOUNDATION

STATE OF MAINE  
PUBLIC UTILITIES COMMISSION

Docket No. 2008-255

September 17, 2008

MAINE PUBLIC UTILITIES COMMISSION  
CMP and PSNH Request for Certification  
of Public Convenience and Necessity for  
the Maine Power Reliability Program  
Consisting of the Construction of  
Approximately 350 Miles of 345 kV and  
115 kV Transmission Lines ("MPRP")

FIRST SET OF DATA  
REQUESTS OF INTERVENOR  
CONSERVATION LAW FOUNDATION

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## **I. INSTRUCTIONS**

1. Please provide the response to each numbered request on a separate sheet of paper, or papers. Each sheet of paper should be three-hole punched.
2. For each response, please state (1) the name(s) and title(s) of the person(s) responsible for preparing the response, (2) the name(s) and title(s) of the person(s) who are competent to give testimony concerning the response, and concerning all documents produced as part of the responses.
3. Where information requested is not available in the precise form described in the question, or is not available for all years indicated, please provide all information with respect to the subject matter of the question that can be identified in the Company's work papers and files, or that is otherwise available.

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4. As used in this data request, and in these instructions, "available" means within the party's knowledge, possession, or control, or within the party's power, capacity or ability to retrieve or obtain from an affiliate, a contractor, or any other source.
5. If any of the requests are unclear, or if the Company has any objections to the requests, please contact the Conservation Law Foundation (Sean Mahoney or Greg Cunningham) at 729-7733 to discuss the matter. Please communicate any objections within 7 days of receipt so that the Conservation Law Foundation can rephrase or redirect the particular data request(s).

### II. DATA REQUESTS

#### NTA Assessment and EE/DR Potential Study, Vol. IX

- CLF-01-01 Reference: Non-Transmission Alternatives Assessment and Economic Evaluation of the Maine Power Reliability Program, page 25:

Please identify all power sales into the New England market from Canada-based or offshore generators (if any) that were assumed in Petitioners' load forecasts both for Maine and for New England and specify the name of the generator, the quantity of power generation assumed for each such generator and the basis for including it in the forecast.

- CLF-01-02 Reference: Non-Transmission Alternatives Assessment and Economic Evaluation of the Maine Power Reliability Program, page 27:

- a. Petitioners' estimated renewable supply mix for New England assumes that, by 2017 Maine will have a total of 500 MW of wind capacity. Please explain the basis for this assumption, particularly in light of Maine legislative mandates for 2000 MW of wind generation in Maine by 2015.
- b. Where possible, please identify the specific wind projects included in this assumed 500 MW of wind capacity, the owner(s) of each project, its location and its generation capacity.
- c. Describe, in terms of percentage, how much of the proposed MPRP project directly facilitates the development of new, significant load wind or other renewable energy generation.
- d. Please explain why non-wind power renewable energy sources were not included in Petitioners' analysis.

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- e. In performing your estimate of the future renewable energy supply mix, what assumptions did Petitioners' make regarding the anticipated renewable portfolio standard requirements in Maine and other New England states for the period 2008-2017?
- f. Identify the specific components of the MPRP project (if any) that could be rendered unnecessary if the Maximum Achievable Cost-Effective Energy Efficiency Potential and demand response potential identified in the GDS study are realized.

CLF-01-03 Reference: Non-Transmission Alternatives Assessment and Economic Evaluation of the Maine Power Reliability Program, page 39:

Alternative energy resources such as fuel cell, PV solar, micro-turbines, tidal and others were not considered in Petitioners' NTA analysis. Please explain why these resources, as part of a distributed generation system, are not viable NTAs?

CLF-01-04 Reference: GDS MPRP Electric Energy Efficiency and Demand Response Potential Study

- a. The energy efficiency analysis relies heavily upon savings associated with the Efficiency Maine Program. Please detail the non-Efficiency Maine energy efficiency measures that were accounted for in this analysis.
- b. The GDS Study assumes a need for growth in the annual budget of the Efficiency Maine Program. Please provide any and all available documentation of Petitioners' support for increased funding of the Efficiency Maine Program.
- c. Please describe with specificity, and provide available documentation of, Petitioners' efforts to promote energy efficiency in Maine during the period 1998-2008.

CLF-01-05 Reference: GDS MPRP Electric Energy Efficiency and Demand Response Potential Study

Please describe the extent to which a future regulatory change, by which utility sales and distribution revenues are "decoupled," was considered as an NTA, or otherwise, as a means of creating incentives for the utilities to invest in energy efficiency measures?

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CLF-01-06 Reference: GDS MPRP Electric Energy Efficiency and Demand Response Potential Study

- a. Please describe in detail the energy efficiency programs and measures from other states that were considered in performing this study, describe such programs and methods, explain how they influenced this Study and provide available documentation associated with the programs and methods.
- b. Has GDS performed an NTA analysis in transmission cases in other jurisdictions? If so, please provide copies of those analyses/studies.

Respectfully submitted,



Gregory M. Cunningham  
Conservation Law Foundation