

October 30, 2009

CENTRAL MAINE POWER COMPANY and)	
PUBLIC SERVICE COMPANY OF NEW)	CENTRAL MAINE
HAMPSHIRE, Request for Certificate of Public)	POWER COMPANY
Convenience and Necessity for Maine Power)	DATA REQUEST NO. 8
Reliability Program Consisting of Construction of)	(TO THE BENCH)
Approximately 350 miles of 345 kV and 115 kV)	
Transmission Lines)	

I. GENERAL INSTRUCTIONS

1. Please provide service of the responses to these data requests to the following:

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2. As used in these data requests, the term “available” means within the Commission’s knowledge, possession, or control, or within the Commission’s power, capacity, or ability to retrieve or obtain from any other source.
3. Where documents responsive to any item in this request are available to the Commission, copies of these documents should be provided in accordance with the provisions of this paragraph. As used in this data request, “available” means within the Commission’s knowledge, possession or control, or within the Commission’s power, capacity or ability to retrieve or obtain from an affiliate, a contractor, consultant or any other source.
- A. “Document or documents,” as used herein, shall mean the original (or, if the information called for cannot be provided as to the original, then each and every copy, duplicate, and reproduction) of any medium upon or from which intelligence or information can be recorded or retrieved, including, but not limited to, letters, telegrams, telexes, memoranda, notes, sound recordings, legal instruments, declarations, filings, drafts, plans, diagrams, pictures, circulars, announcements, manuals, brochures, publications, statistical records, spreadsheets, desk calendars, appointment books, diaries, computer printouts, data processing input and output,

electronic mail, computer memories, microfilm, accounts, journals, ledgers, bills, invoices, purchase orders, checks, receipts, and the like, whether handwritten, typed, printed, purchased, coded, tape-recorded, photographed, or otherwise reproduced, and each and every copy, duplicate, reproduction, prior draft, excerpt, note and summary of, or prepared from, any of the foregoing which is not identical to the original due to corrections, alterations, notations, initials, deletions, marginal markings, underscoring, confirmation, indication of routing or otherwise. Without limiting the foregoing, this term includes any document within the scope of Rule 26 of the Federal Rules of Civil Procedure.

- B. "Relate to" or "concern" are used in their most comprehensive sense and include not only documents in which explicit reference is made to the subject of the inquiry but also documents in which the subject matter is in any way considered, discussed or mentioned.
- C. If you object to any request on the ground that it requests information that is privileged, falls within the work product doctrine, or is otherwise protected from discovery, provide the following information, except as it may call for the precise information you object to disclosing: Identify the document, which means to state the nature (*e.g.*, letter, handwritten note, etc.) of the document, the number of pages, its title, its date, its author, and addressee, its present location and custodian, and the manner and date of disposition of any document which once was, but is no longer, in your possession or subject to your control.
- D. These requests for production require supplemental or amended answers to the extent required by Rule 26 of the Federal Rules of Civil Procedure. In addition, these requests for production shall be deemed to be continuing requests for supplemental responses pursuant to Rule 26 of the Federal Rules of Civil Procedure. If, at any time after service of responses to these requests for production and prior to hearing on this matter, you obtain additional information responsive to any of these requests, you are hereby requested to promptly serve supplemental responses.
- E. These requests for production require production of any and all documents in your possession, custody or control including the possession, custody or control of any agent or employee.
- F. In the event your response is that the documents are not in your possession or custody, describe in detail the unsuccessful efforts you have made to locate the documents.
- G. If your response is that the documents are not in your control, identify who has control and the location of the documents.
- H. If a request seeks a specific document or an itemized category which is not in your possession, control or custody, provide any documents you have that contain all or part of the information contained in the required document or category.

- I. Identify the source of each of the documents you produce.
 - J. Any person or company referred to in this Request for Production of Documents includes all of their agents, employees or other persons acting on their behalf.
4. When 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 workpapers and files, or that is otherwise available.
 5. Notwithstanding any designation of specific witnesses or documents in connection with a specific data request, if the party or any of its witnesses have used different assumptions, relied upon different reasoning, or reached different conclusions or recommendations, and thus would respond differently to the same data request, it is requested that the appropriate witnesses each provide separate answers to that request.
 6. When any data response requires reference to testimony or exhibits, please specify, where appropriate, the pages and lines or paragraphs of the testimony or exhibit.
 7. When a data request asks a witness to provide the basis for a statement, information, assumption, or data, please provide any and all sources relied upon and documents relating to (whether supporting or contradicting) the statement, information, assumption, or data including, but not limited to, engineering, evaluative, economic, market research, load research, financial, or technical material contained in any studies, analyses, reports, memoranda, publications, notes, printouts, electronic mail, diskettes, spreadsheets, correspondence, workpapers, or other hard copy or computer data files.
 8. Responses to these data requests should be identified using the numbering system employed in this proceeding. For example, the response to the first question should be identified as "CMP-08-01."
 9. 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.
 10. Please provide the response to each numbered request in electronic format to the extent possible.
 11. For each response and all documents produced as part of the response, please state: (1) the name and title of the person responsible for preparing the response; and (2) the name and title of the person competent to give testimony about the response and accompanying documents.
 12. Please consider this data request as an on-going request, and provide updates to the information requested by Central Maine Power as soon as it becomes available during the course of this proceeding.

13. If you have any questions regarding clarification of any of the following data requests, and before making any objections to any request, please contact Jared des Rosiers (207-791-1390).
14. In each response, please identify the Staff member or consultant who was principally responsible for preparing the aspect of the testimony to which the question is directed.

II. DATA REQUESTS

- CMP-08-01 What, in Staff's view, is the purpose of the regional planning process conducted by ISO-NE?
- CMP-08-02 What authority, if any, does Staff believe ISO-NE has under federal law or otherwise with respect to determining the need for transmission upgrades under the applicable reliability standards?
- CMP-08-03 In what respect, if any, did the Needs Assessment presented by CMP in this case depart from the requirements of ISO-NE OATT Attachment K?
- CMP-08-04 Does the Staff believe that ISO-NE has authority under its tariff, including Attachment K thereto, to adopt Staff's alternative planning assumptions and alternative transmission solution, whether Scenario 1 or Scenario 2, without repeating the regional planning processes delineated in the pertinent tariff provisions? If so, please provide the basis for that belief.
- CMP-08-05 Please state whether Staff believes that under the terms of ISO-NE's tariff and/or federal law ISO-NE must, or may, defer to the determination of a state regulatory authority concerning the need for, and/or design of, a transmission solution when deciding whether to approve such solution for regional cost recovery. Please state the basis for Staff's conclusion.
- CMP-08-06 In evaluating "need" under 35-A M.R.S. §3132, and/or under Chapter 330 of the Commission's rules, does the term "ratepayers" refer to Maine ratepayers, or to some other group of ratepayers, and if so what other group?
- CMP-08-07 Page 42: Please provide citations to all CMP's materials that were relied upon to support the assertion that "CMP concluded that NTAs could be provided at approximately 10% of the full cost of the MPRP."
- CMP-08-08 Page 43: Please provide citations to all CMP's materials that were relied upon to support the assertion that CMP is "... suggesting that the fact that New England "society" would pay far more for the MPRP than comparable NTAs should not be relevant to the decision."
- CMP-08-09 Page 43: Please provide the basis in Chapter 330 that the Staff relies upon in considering the costs and benefits to Maine Ratepayers as compared to the cost and benefits to New England "society."

- CMP-08-10 Is it the position of the Staff that the MPRP should be evaluated on a cost allocation policy other than the current ISO-NE cost allocation policy? If the answer is yes, please provide a description of the cost allocation policy that the Staff believes should serve as the basis for Commission review of the MPRP.
- CMP-08-11 Has Staff calculated the difference in cost to Maine ratepayers between Staff Scenario 1 and MPRP as proposed by CMP? If so, what is that difference? Please indicate your assumptions about how much of the cost of each would be recovered through the regional (as opposed to Maine) transmission rate.
- CMP-08-12 Page 2: To what document is Staff referring by “the Transmission Needs Analysis (TNA)?”
- CMP-08-13 Page 2: Would the following consequences, if demonstrated, constitute an “economic or other justification” for investment beyond the investment asserted to be justified in the Bench Analysis? If not, why not?
- a. Creating construction and related employment during a recession;
 - b. Increasing the transfer limit for Maine’s transmission system into southern New England;
 - c. Encouraging the development of wind power in Maine;
 - d. Additional property tax revenues paid to Maine towns funded by New England as a whole;
 - e. Avoiding the delays that would result from further review by ISO-NE and the New England stakeholders concerning the project;
 - f. Reducing or eliminating uncertainty concerning whether the costs of the project would be recovered through regional rates rather than borne by Maine ratepayers alone.
- CMP-08-14 Page 2: Please describe the design requirements to which Staff refers in the phrase “...still in excess of design requirements...”, and provide the source of those design requirements. Please also identify in detail how the Staff’s proposed assumptions exceeded such design requirements.
- CMP-08-15 Page 3: Please provide, in detail and with reference to specific documents, the “reliability standards” Staff contends “can be met by substantially less investment.”
- CMP-08-16 Page 3: What, if any, constraints bind the Commission in determining how much “additional transmission investment” could be justified by the referenced “State, regional and federal energy policies regarding renewable energy?”
- CMP-08-17 Page 3: Does Staff contend that Staff Scenario 1 solves all violations “indicated by the revised TNA?” Please define “revised TNA” as used in by Staff in this context.
- CMP-08-18 Page 4: Please define “systemic weaknesses” as used by Staff.

- CMP-08-19 Page 4: Please indicate how many years constitute a “reasonable planning horizon” for system planning, and provide the basis for the statement.
- CMP-08-20 Pages 5 and 6: Figure 1 and Figure 2 provide a “Need Year” based on 50/50 loads and includes years 2020, 2028 and past 2030. Please provide the load forecast that Staff uses to determine the “Need Year” and also provide the calculations, notes, and work papers used to determines each component’s year of need.
- CMP-08-21 Page 6, Note, Figure 2: Regarding Staff’s statement that “...NPV would decrease if need for facilities is determined to be later...”: What assumptions has Staff made concerning the escalation in the cost of construction of the facilities, including with respect to labor, materials and commodity costs and construction sequencing, that “could be built later?” Please provide the basis for any such assumptions.
- CMP-08-22 Page 6, Figure 2: What does a “Need Year” of “undetermined” mean for Staff proposed reinforcements?
- CMP-08-23 Where Staff proposes to defer elements of MPRP for which CMP has already obtained options on required real property, including Ravens Farm, how does the Staff propose CMP should treat those real estate options? If the Staff proposes to let the options expire, please provide Staff’s analysis of the real estate costs and constraints associated with the construction of deferred elements.
- CMP-08-24 Page 7: What is the source of the term “Regional Reliability Area?”
- CMP-08-25 Page 7: By Northeast Power Reliability Council, does Staff mean Northeast Power Coordinating Council?
- CMP-08-26 Page 8: Please provide the dates that NPCC, ISO New England and NERC’s reliability standards were originally developed.
- CMP-08-27 Page 8: Please provide a detailed list of instances in which MPRP has relied upon the application of NERC, NPCC and ISO-NE reliability design standards to non-BPS facilities in justifying the need for MPRP.
- CMP-08-28 Has Staff performed any estimate or analysis to determine the impact, if any, on the needs that Staff has identified if the draft revisions to the definition of BPS now pending before the FERC are approved?
- CMP-08-29 Page 9: In referencing “...a contingency event whose probability of occurrence is 1.0,” does Staff intend to indicate that the contingency is certain to occur? If not, what does Staff intend by this statement?
- CMP-08-30 Page 10: Please describe the relevance of the discussion of CMP’s Transmission Planning Criteria, as described in section B on page 10, to Staff’s analysis.

- CMP-08-31 Page 10: Does Staff contend that any of the referenced CMP transmission planning criteria is inappropriate? If so, please state why, and describe what the planning criteria should be instead.
- CMP-08-32 Page 10, note 3: By “extreme contingency” does Staff mean “extreme condition?”
- CMP-08-33 Page 11: Please provide:
- a. The names of all members of MPUC Staff, consultants and Commissioners who attended any meetings (in person or by conference call) at which the planning for MPRP was discussed prior to the filing of this case at the MPUC;
 - b. The dates of any and all such meetings;
 - c. Any written materials, or a written summary of any oral comments, that the MPUC representatives provided or received at such meetings or otherwise, concerning the appropriate planning standards and assumptions for MPRP.
- CMP-08-34 Page 12: Regarding Staff’s assertion that “... many of the assumptions in the MPRP system studies are not reasonable...”:
- a. Does the ISO-NE have the responsibility to determine, for the New England Bulk Power System, what constitutes a “reasonable assumption” for use in a system study?
 - b. Is the responsibility of the ISO-NE limited to the New England Bulk Power System? Please explain the basis for your answer.
 - c. If the ISO-NE does not have that responsibility to determine what constitutes a “reasonable assumption,” who does? Please provide the basis for your response.
- CMP-08-35 Page 12: Regarding Staff’s assertion that “... many of the assumptions in the MPRP system studies are not reasonable in the sense that the assumptions over-estimate the need for transmission”:
- Does Staff agree that under proper transmission planning process, reasonable planning assumptions are determined first and then the “need for transmission” is determined by the use of those reasonable assumptions in appropriate transmission planning models? If not, please explain why not.
- CMP-08-36 Page 13: Regarding Staff’s assertion that “...the differences in methods employed by participants in the load forecasting process skewed the New England-wide forecast from actual expected values.”
- a. As used in this phrase, what are “actual expected values?”
 - b. In any proceeding, has Staff ever recommended to the Commission that the forecast data submitted by CMP understated the likely load?
 - c. Has Staff utilized the econometric sales forecast model developed by its consultant in Docket No. 2007-215 to forecast CMP’s peak forecast for some or all of the planning period for MPRP? If so, please provide the results of that forecasting. If not, please explain why not?

- d. Does the “history” of ISO-NE’s reporting reliability to the NPCC based on 50/50 forecasts require that ISO-NE plan its system using 50/50 forecasts? If the answer is yes, please explain why.
- CMP-08-37 Page 13: Regarding Staff’s assertion that “...system studies have historically been based on 50/50 forecasts...”, please list all “system studies” used for transmission planning in New England in the past 15 years that have used 50/50 forecasts.
- CMP-08-38 Page 13: Please provide the basis for Staff’s statement that “Historically, ISO-NE developed a New England-wide load forecast by aggregating the individual load forecasts of the pool participants by state.”
- CMP-08-39 Page 13: To what “uses” is Staff referring when it states that “[t]he forecasts used by ISO-NE typically reflect a 50/50 probability of occurrence”?
- CMP-08-40 Page 13: To what “reports” is Staff referring when it states that “ISO-NE also uses a 50/50 forecast in its reports to the NPCC regarding reliability”?
- CMP-08-41 Page 14: Regarding Staff’s assertion that “... the use of 90/10 loads rather than 50/50 loads...appears to represent a methodological change...”
- a. Does Staff contend that the fact that there has been a methodological change indicate that the prior practice is superior and should be relied upon? If so, please state why.
 - b. Is it Staff’s position that the use of 90/10 loads rather than 50/50 loads is inappropriate under the applicable reliability planning standards? If so, please explain the basis of Staff’s position.
 - c. Does the ISO-NE have the responsibility and authority to determine the load input assumptions for system studies concerning the New England Bulk Power System? If not, please explain why not.
- CMP-08-42 Page 14: Regarding Staff’s assertion that “...PJM transmission reliability design criteria use a 50/50 forecast for applications similar to the MPRP TNA”: Has Staff performed any analysis of whether the application of all the PJM reliability design criteria to Maine would show more, less, or the same needs as were revealed by the Needs Assessment submitted by CMP in this case? For example, has Staff assessed the impact of using PJM’s 15 year planning horizon? Please provide any such Staff analysis.
- CMP-08-43 Page 14, n.8: Regarding the phrase: “...take into account the full impact of the recent financial crisis...” Is it Staff’s view that the impact of the current economic situation will continue to lower load forecasts? Does Staff believe that all future load forecasts will show projections at or below the levels shown in the January 2009 CMP forecast? If so, what is the basis for that belief?
- CMP-08-44 Page 15:

- a. Please explain the basis for applying the ISO-NE projected growth rate to CMP's peak load forecast.
 - b. Does Staff agree that load growth following a recession is often more rapid than predicted by forecasts developed during the recession? If not, please provide all instances where Staff believes this has not been the case.
 - c. If the recovery from the recession results in relatively higher growth levels, what is the justification for using the ISO-NE's "forecasted combined growth rate" of 1.3%?
- CMP-08-45 Page 15: Does Staff assert that the "one day in ten years" standard and the "90/10 weather conditions" are equivalent? Please explain your response.
- CMP-08-46 Page 18, n.10: Does Staff contend that any element of MPRP was proposed to address a violation shown only under dispatch D5? If so, please identify the element and provide a reference in the Needs Assessment or Transmission Alternatives Assessment that supports that contention.
- CMP-08-47 Page 18: Does Staff contend that the fact that the addition of transmission resolves a particular violation implies that the transmission would not be required in the absence of that particular violation? If so, please explain why.
- CMP-08-48 Page 20: Does Staff contend that the outage assumptions of the Needs Assessment could not represent system conditions at peak load? If so, please explain the basis for that contention.
- CMP-08-49 Has Staff applied the PJM generator availability approach as described on page 20 to the Maine system? If so, with what result?
- CMP-08-50 Page 20: Has Staff assessed how often and for what periods of time all four W. F. Wyman units in Yarmouth ("Wyman units") have been offline over the past five years?
- a. If the Wyman units are off line, how quickly can they be started in the event the gas supply to the Westbrook generating facility is interrupted?
- CMP-08-51 Page 20: To what "data supplied by ISO-NE to NPCC" is Staff referring?
- CMP-08-52 Page 20: Please identify the generation that comprises the "generation outages in Maine during peak load periods [that] are modeled at a level in excess of 2100 MW."
- CMP-08-53 Please provide a reference in the Needs Assessment or the Transmission Alternatives Assessment that describes the off line generation in the dispatch cases as "generation outages."
- CMP-08-54 Page 20: Please provide the correct citations to the PJM planning manual to which Staff refers.

- CMP-08-55 Does the language quoted on page 20 from the PJM manual refer to modeling for the purpose of generator deliverability requirements or transmission system planning studies?
- CMP-08-56 Page 20, note 11: Please provide the basis for Staff's assertion that CMP "used the lowest hydro dispatch (summer on-peak) experienced in the Maine zone in the last 45 years."
- CMP-08-57 Page 21: Does Staff expect the Wyman units, or any of them, to remain available through 2020? If so, upon what does Staff base that expectation?
- CMP-08-58 Page 21: Has the Staff assessed how frequently and at what load levels it will be necessary to support its assumption of the continued availability of the Wyman units for planning purposes? If so, please provide that assessment.
- CMP-08-59 Page 21: Provide the basis for the statement that "units cannot retire without a separate process to ensure reliability."
- CMP-08-60 Page 21: Has the Staff assessed the environmental impacts of the increased operation of the Wyman units (or any of them) necessary to support its assumption of the continued availability of the Wyman units for planning purposes? If so, please provide that assessment.
- CMP-08-61 Page 21: Regarding the statement: "CMP and ISO-NE stated that this two-generator assumption was made so that Reliability Must Run (RMR) contracts with generators will be avoided."
- a. Please provide the reference to this statement.
 - b. Does Staff contend that CMP and ISO-NE have asserted that this is the only reason for adopting a two-generator-out assumption?
 - c. Has Staff estimated the cost of an RMR contract for the Wyman units or any other units in Maine for the period during which MPRP would be effective in addressing the reliability violations identified in the cases developed with the Wyman units (or other units) assumed unavailable? If so, please provide that estimate.
 - d. In light of the start-up time required for the Wyman units, what are the total hours that those units would have to run to satisfy reliability requirements?
 - e. What group of ratepayers would be responsible for RMR payments?
 - f. Please provide all Staff, Commission or consultant correspondence, workpapers, or reports, either internal or with or by consultants, other regulators, or any ratepayer; regarding the Wyman units RMR analyses or impacts to Maine ratepayers.
 - g. Please provide all Staff, Commission or consultant correspondence, workpapers, or reports, either internal or with or by consultants, other regulators, or any ratepayer; regarding all other RMR, including the Rumford Power Associates and Westbrook Energy Center RMR analyses or impacts to Maine ratepayers.

- h. Has the Staff discussed potential retirement of the Wyman units with their owners? What was the substance of those communications, if any?
- CMP-08-62 Page 21: Please explain why, in Staff's view, the use of a two-generator-out scenario in RMR analyses is "circular."
- CMP-08-63 Page 22: If the gas supply to the Westbrook generating units were interrupted, which of the units would continue to run? Does Staff contend that system planning should not consider, as a base case condition, the lack of gas supply to some or all of Maine's gas fired generation?
- CMP-08-64 Has the Staff assessed how often and for what periods of time the Westbrook generating facility has been interrupted due to gas shortages or otherwise? If so, please provide that assessment.
- CMP-08-65 Has the Staff made any assessment of gas service interruptions that have occurred during the last five years that have caused one or more the gas fired generating units in Maine to curtail service? If so, please provide that assessment.
- CMP-08-66 Page 22: Please provide a reference to each and every aspect of the MPRP Needs Assessment that is "inconsistent" with ISO-NE planning procedures.
- CMP-08-67 Page 23: What, in Staff's view, would constitute sufficient evidence that a particular generation condition had "a reasonable probability of actually occurring?"
- CMP-08-68 Does Staff contend that Planning Procedure 5.3 of ISO-NE requires that either
- a. A generation condition must have occurred in the past to satisfy the standard, or
 - b. A generation condition must meet a specified probability of occurring to satisfy the standard, and
 - c. If so state the basis for your contention.
- CMP-08-69 Page 23: Please state the basis for Staff's assertion that "the MPRP dispatches appear to be based more on an 'extreme worst' case basis..."
- CMP-08-70 Please provide any examples of which Staff is aware of "extreme worst" cases used in planning studies in New England or elsewhere and explain why the MPRP dispatches warrant the same categorization.
- CMP-08-71 Page 23: Does Staff contend that the ISO-NE's interpretation of "reasonably stressed" should not be "influenced by management directives?" If so, please state the basis for this assertion.
- CMP-08-72 If the ISO-NE's interpretation of "reasonably stressed" should not be influenced by management directives, please indicate the manner in which Staff believes

- ISO-NE management should exercise its management function over the conduct of ISO-NE individuals responsible for planning.
- CMP-08-73 Please provide the reference for the comment attributed to ISO-NE that “MPRP was a test case for putting ‘meat on the bones’ of PP-3.”
- CMP-08-74 Please define “lack of transparency” as used on page 23.
- CMP-08-75 When was the first occasion on which any representative of the Commission learned of the use of base cases with two generators out?
- CMP-08-76 Does Staff contend that it had no opportunity to comment on or discuss with ISO-NE the application of the ISO-NE use of the two-generator-out approach prior to the filing of MPRP with the Commission?
- CMP-08-77 Page 24: Please identify (to the extent not done so on page 24) any jurisdictions which Staff contends use planning criteria that are “both better defined and much less stringent than ISO-NE’s implementation of the ‘reasonably stressed’ principle.”
- CMP-08-78 Does Staff contend that, had the NYISO planning standards been used by ISO-NE in this case, the identified needs would have been different than those found in the MPRP Needs Assessment? If so, please indicate in detail the basis for that contention and describe in detail the manner in which the findings would differ.
- CMP-08-79 How does the NYISO define “too many scenarios?”
- CMP-08-80 Does Staff contend that ISO-NE should use the ConEd approach of designing “the 138 kV system to an N-1 standard” for the BPS in Maine?
- CMP-08-81 What is the load forecast approach used by ConEd for planning?
- CMP-08-82 Page 25: Please identify in detail “all of the tools or actions” that system operators would have available in Maine to take between the first and second contingencies.
- CMP-08-83 Page 25: Please identify in detail the transfer adjustments Staff believes available and appropriate for system operators to make between contingencies.
- CMP-08-84 Page 25: If a violation is shown at N-1 testing, does Staff contend that operator actions following N-1 can resolve the violation?
- CMP-08-85 If the MPRP Needs Assessment tested the system to N-1, please explain how “the MPRP TNA is insufficient ... in that it does not reflect use of all the tools or actions that a system operator would have available...between the first and second contingencies.”

- CMP-08-86 Please identify constraints that should be reflected in system planning, if any, on the ability of “system operators to adjust transfers between contingencies.”
- CMP-08-87 Page 25: Please provide Staff’s view on how much load system operators should be permitted to drop, for system planning purposes, following the second contingency.
- CMP-08-88 Page 26: Please provide a reference to each case in which “the MPRP TNA applies N-1-1 standards to non-BPS portions of the transmission system.”
- CMP-08-89 Page 26: Does Staff contend that MPRP does not include actions and investment to improve power factor?
- CMP-08-90 Page 27: Please indicate specifically what constitute the “substantial number of the reported voltage violations.”
- CMP-08-91 Page 28: Has Staff estimated the impact on the needs identified in MPRP of CMP’s asserted failure to “identify the particular limiting piece of equipment and determine whether the violation could be cured by replacing that particular piece?”
- CMP-08-92 In the experience of Staff or Staff’s consultants, how much “relief” is available for thermal violations by identifying and replacing the components as described on page 28?
- CMP-08-93 Page 29: Does Staff contend that CMP should not adopt PP-7 for existing equipment? Please state the reasons for Staff’s contention.
- CMP-08-94 Page 30: Does Staff contend that the overall effect of adopting PP-7 for existing as well as new equipment had the effect of increasing the number and/or severity of violations found in the MPRP studies? Please provide the basis for Staff’s contention.
- CMP-08-95 Page 30: Regarding the statement: “...CMP may have been able to remove some of the thermal violations by utilizing resources available in ten minutes to address thermal issues rather than solely relying on operator actions.” Please provide the basis for this statement, including any and all examples of where use of such resources would have obviated the need for operator action.
- CMP-08-96 Page 31: In Staff’s view, is it good utility practice to allow “voltage degradation between the system normal state, or all components in service, and the emergency state with elements out of service?” Please identify any and all utilities of which Staff is aware that permit such degradation.
- CMP-08-97 Page 35: Please identify what “additional analysis” Staff believes necessary before a final determination can be made concerning what transmission components should be approved by the Commission in this proceeding?

- CMP-08-98 Page 35: Please identify all the “applicable standards” referred to in the first paragraph of section B.
- CMP-08-99 Page 35: Does Staff agree that building MPRP as proposed by CMP would provide greater “reliability benefits for Maine and the region” than Staff Scenario 2? If not, please explain your response.
- CMP-08-100 Page 35: Does Staff agree that building MPRP as proposed by CMP would provide “greater support for State, regional and federal energy policies regarding renewable energy” than Staff Scenario 2? If not, please explain your response.
- CMP-08-101 Page 36: Please explain in detail how it would be possible to conduct “the specific cost/benefit analysis of the incremental investments” noted on page 36. Include in your answer:
- a. How the value of support to State policy could be quantified;
 - b. How the value of support to regional policy could be quantified; and
 - c. How the value of support to federal policy could be quantified.
- CMP-08-102 Page 36: In its analysis of the “economic value of the varied timing,” did Staff consider the impacts of inflation in labor, materials and commodity costs and from costs related to construction remobilization and sequencing? If so, please provide that analysis.
- CMP-08-103 Pages 38-41, Figures 7-10: Please confirm that Staff believes that all transmission components listed in the Staff’s Scenarios 1 and 2 that have a “Need Year” of “Current” are needed immediately, or at least as soon as they can be constructed by CMP. If not, please define the term “Current” in Figures 7-10.
- CMP-08-104 Page 42: Please provide the basis for your assertion that “CMP concluded that NTAs could be provided at approximately 10% of the full cost of the MPRP.”
- CMP-08-105 Page 44: What, if any, decision criteria does Staff propose that CMP use to determine whether CMP should modify its design to accommodate abutting landowners where such modifications increase the cost of the project? Does it make a difference whether such additional costs are considered “local” costs under the ISO tariff?
- CMP-08-106 Page 44: Please provide the basis for your assertion that “The MPRP would affect more than 600 parcels of land, and require the taking of 38 dwellings.”
- CMP-08-107 Pages 45-46: Please identify any specific abutting property owners Staff has in mind with respect to its proposals that (a) CMP should not rigidly apply its T56 standards and (b) CMP should be willing to consider modified construction configurations.

- CMP-08-108 Page 45: Does Staff agree that maintaining consistent clearances throughout the CMP system increases safety for CMP's line workers? If not, please explain why not.
- CMP-08-109 Page 45: Does Staff propose that CMP use restrained insulators or "V-string insulators" on any particular existing or new transmission facilities to address abutter concerns?
- CMP-08-110 Page 44: Regarding Staff's assertion that "...CMP seems to consider less line clearance than T56 dictates when it is unable to acquire sufficient land rights to do so," please provide specific reference as to any instance where CMP has relaxed its T-56 standards.
- CMP-08-111 Has Staff done any analysis of the real estate constraints associated with Staff Scenarios 1 and 2, including necessary real estate acquisition in terms of number of properties, residences, zoning constraints and estimated costs? If so, please provide the results of that analysis along with all workpapers, data and reports to support those results.
- CMP-08-112 Has Staff done any analysis of the environmental constraints associated with Staff Scenarios 1 and 2, including the required regulatory review, permitting, mitigation, remediation and estimated costs? If so, please provide the results of that analysis along with all workpapers, data and reports to support those results.
- CMP-08-113 Has Staff done any analysis to identify design constraints associated with Staff Scenarios 1 and 2, including substation physical layout and transmission line alignment evaluations? If so, please provide the results of that analysis along with all work papers, data and reports to support those results.

Respectfully submitted,



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