

**CENTRAL MAINE POWER COMPANY
RESPONSE TO EXAMINER'S DATA REQUEST NO. 1
DOCKET No. 2008-255**

October 7, 2008

EX-01-02

- Q.** (Volume I, Page 93) If the MPRP approvals are required by June 2009, and the system has been deteriorating for the last 30 years since the last major upgrades were performed, please describe why CMP waited so long to identify system needs that are needed so soon in the future?
- A.** Neither this statement nor the filing of MPRP provides any basis for a claim that the CMP transmission "system has been deteriorating for the last 30 years since the last major upgrades were performed." CMP regularly evaluates its transmission system to ensure compliance with good utility practice and applicable reliability standards. The Liberty audit of CMP's transmission and distribution planning and maintenance practices performed at the Commission's behest in Docket No. 2004-248 (May 5, 2005) demonstrates as much. Please see page 12 of the attached Liberty report, finding that CMP's "transmission system inspection and pole-testing programs are in compliance with NESC" and that "the way CMP plans its distribution system and how it performs some specific maintenance tasks... are also proactive activities that promote reliability." There have been major upgrades to CMP's transmission system during that period, including the Maxcys 345/115 kV substation, the South Gorham 345/115 kV substation, and many 115 kV and 34.5 kV reinforcements. The need for substantial additions to CMP's transmission system is not the result of the "deterioration" of the existing system but is due in large measure to the fact that Maine's customers require twice as much electricity than 35 years ago when the principal backbone elements of the current system were put into place, and the fact that there have been a variety of changes in the generation within Maine.

CMP's identification of system needs is consistent with the regional system planning approach for analyzing and establishing a ten-year plan to address all reliability concerns according to today's North American Electric Reliability Corporation (NERC), Northeast Power Coordinating Council (NPCC), and ISO-NE transmission planning standards, criteria, and procedures. The point of the language cited above on page 93 was to indicate that, in order for the identified upgrades to be in service by the year 2012, the identified year of need, a decision by the Commission is needed by June 2009. A decision by this time will allow for the facilities to be built in a sequence that ensures reliability during construction, and still enter service by the identified year of need.

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Attachment:

1) Liberty Report