



**Northeast  
Utilities**

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June 30, 2014

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: The Connecticut Light and Power Company  
Interconnection Agreement Between The Connecticut Light and  
Power Company and Covanta Bristol, Inc.  
Docket No. ER14-\_\_\_\_\_**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act and Part 35 of the regulations of the Federal Energy Regulatory Commission (“FERC” or the “Commission”), Northeast Utilities Service Company (“NUSCO”), on behalf of its affiliate, The Connecticut Light and Power Company (“CL&P”), hereby submits a two party Generator Interconnection Agreement between CL&P and Covanta Bristol, Inc. (“Covanta”), designated as Rate Schedule No. IA-NU-20 (the “Interconnection Agreement”). In support hereof, CL&P states as follows:

**I. CONTENTS OF THIS FILING**

- This transmittal letter; and
- The Interconnection Agreement.

**II. DESCRIPTION OF THE PARTIES**

CL&P is a public utility subsidiary of Northeast Utilities. CL&P, along with certain other NUSCO affiliate companies<sup>1</sup> own and operate transmission facilities in the states of Connecticut, Massachusetts and New Hampshire, and their facilities are used to

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<sup>1</sup> The other transmission owning NU subsidiaries are Western Massachusetts Electric Company, Public Service Company of New Hampshire and NSTAR Electric Company.

provide regional network service under Section II of the ISO New England Inc. (“ISO-NE”) Transmission, Markets and Services Tariff (“ISO-NE Tariff”)<sup>2</sup> and local network service and point-to-point service under Schedules 21-NU and 21-NSTAR of the ISO-NE OATT.

Covanta’s generating facility is an approximately 16.3 megawatt steam turbine generator located in Bristol, Connecticut (“Generating Facility”). The Generating Facility is a qualifying facility (“QF”) under the Public Utility Regulatory Policies Act of 1978. The Generating Facility has been in operation since 1988 and is interconnected to the distribution system of CL&P. CL&P has been purchasing power from the Generating Facility pursuant to an Electricity Purchase Agreement (“EPA”) dated as of August 1, 1985. The EPA included provisions under which CL&P provided interconnection service to the Generating Facility. By agreement between CL&P and the Generating Facility, the EPA expires on June 30, 2014.

### **III. DESCRIPTION OF AGREEMENT AND REASON FOR FILING**

The Generating Facility has been connected to CL&P distribution system since 1988, and CL&P has, in turn, been purchasing the power under the EPA and selling the output from the Generating Facility into the ISO-NE market through the New England transmission system. Going forward, Covanta will continue to make use of CL&P’s distribution system and the New England transmission system to market the output of the Generating Facility. Covanta intends to sell the electric power output from the Generating Facility into markets administered by ISO-NE in accordance with the ISO-NE Tariff. CL&P and Covanta executed the Interconnection Agreement to provide the rates, terms and conditions for continued interconnection service for the Generating Facility.

The Interconnection Agreement is a two-party agreement between CL&P and Covanta. The Generating Facility has already been participating in the ISO-NE market, and Covanta is not modifying the existing Generating Facility or the Interconnection Facilities. Under these circumstances, a three-way Interconnection Agreement between CL&P, Covanta and ISO-NE under Schedule 23 of the ISO-NE OATT is not applicable. The Commission’s standard interconnection rules promulgated in Order No. 2006<sup>3</sup> do not apply in this case, as the Generating Facility is already interconnected and has not changed its physical operations in such a way as to require a new Interconnection Request that would require ISO-NE to be a party to the Interconnection Agreement.<sup>4</sup> Counsel for CL&P has consulted with counsel for ISO-NE, who has concurred that a new Interconnection Request triggering the need for a three-party *pro forma* interconnection agreement is not required under Schedule 23 of the ISO-NE OATT.

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<sup>2</sup> Section II of the ISO-NE Tariff is the Open Access Transmission Tariff herein referred to as the “ISO-NE OATT.”

<sup>3</sup> Order No. 2006, *Standardization of Small Generator Interconnection Agreements and Procedures*, (May 12, 2005) (“Order No. 2006”).

<sup>4</sup> Order No. 2006 at ¶ 555.

#### IV. OTHER INFORMATION REQUIRED BY SECTION 35.13

NUSCO provides, to the extent not already provided for elsewhere in this Transmittal Letter, the following information required by Section 35.13(b) and (c) of the Commission's Regulations:

- Copies of this filing have been mailed to:

Eric P. Keyser  
Manager of Power Markets  
Covanta Energy Corporation  
445 South Street  
Morristown, NJ 07960  
(973) 882-2767  
[EKeyser@CovantaEnergy.com](mailto:EKeyser@CovantaEnergy.com)

#### V. COMMUNICATION AND SERVICE

NUSCO requests that all communications regarding this filing be sent to:

William O'Hara  
Manager, Transmission  
Interconnections and Services  
NUSCO  
P.O. Box 270  
Hartford, CT 06141-0270  
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#### VI. PROPOSED EFFECTIVE DATE AND WAIVER

Pursuant to Section 35.11 of the Commission's regulations, CL&P respectfully requests that the Commission grant waiver of the prior notice requirements in Section 35.3 of its regulations to allow the Interconnection Agreement to become effective on July 1, 2014. Good cause exists to grant the waiver because Covanta is in agreement, and it will provide for continued interconnection service for the Generating Facility upon termination of its existing interconnection agreement, and because the instant filing does not change rates. In addition, the Commission will ordinarily waive the sixty-day notice requirement where the effective date of the rate schedule is prescribed by the parties' contract<sup>5</sup>. That is the case here, where Covanta has agreed to the effective date requested.

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<sup>5</sup> *Central Hudson Gas & Electric Corp.*, 60 FERC ¶ 61,106 (1992). See also *Prior Notice and Filing Requirements Under Part II of the Federal Power Act*, 64 FERC ¶ 61,139 (1993).

To the extent necessary, CL&P respectfully requests that the Commission grant a waiver of any other requirements in its rules and regulations necessary for acceptance of this filing.

## **VII. CONCLUSION**

For the foregoing reasons, NUSCO respectfully requests that the Commission accept this Interconnection Agreement and allow it to take effect without suspension, condition or modification as of July 1, 2014, and grant any waivers of its regulations as may be necessary.

Very truly yours,

**NORTHEAST UTILITIES SERVICE  
COMPANY**

**on behalf of**

**THE CONNECTICUT LIGHT AND  
POWER COMPANY**

By: /s/ Rosemary K. Leitz

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Attachment