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August 14, 2008

VIA HAND DELIVERY

Mr. S. Derek Phelps  
Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

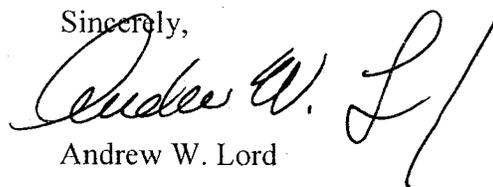
Re:    Docket No. F-2008  
      CT Ten-Year Forecast of Electric Loads and Resources Forecasts and Load

Dear Mr. Phelps:

Enclosed please find NRG Energy, Inc.'s comments on the 2008 Draft Report on loads and resources issued by the Connecticut Siting Council.

If you have any questions, please feel free to contact me.

Sincerely,



Andrew W. Lord

Enclosure

cc:    Service List

BOSTON

HARTFORD

NEW HAVEN

STAMFORD

WOBURN

COMMENTS OF NRG ENERGY, INC.

NRG is pleased to submit comments on the 2008 Draft Report on loads and resources issued by the Connecticut Siting Council ("CSC") on July 10, 2008. NRG has participated in this proceeding by submitting responses to Pre-Hearing Interrogatories on June 19th and July 8, 2008 and provided oral testimony before the Siting Council on July 15, 2008.

NRG would once again like to thank the Council for their recent actions which paved the way for NRG to add new peaking generation in southwest Connecticut. NRG Energy has recently completed major improvements at its Cos Cob generating station in Greenwich which adds 40 megawatts of clean reliable power to the site. NRG funded and developed this project that added two new gas turbine units bringing total output to 100 MW without increasing the size of the site's footprint. During the three-month construction period, NRG also added new sound-resistant housings to reduce the plant's overall noise level, and landscaping to enhance the site's visual appeal. All five units were retrofitted to use water injection technology, resulting in a 50 percent net station reduction in nitrogen oxide emissions and a 97 percent reduction in sulfur emissions by using ultra low-sulfur distillate fuel. These improvements are an integral part of the State's effort to meet the Environmental Protection Agency's ozone standard.

The plant provides more power for Southwest Connecticut's peak periods with fewer emissions and less noise, and it's a more attractive facility, capable of providing power to more than 80,000 homes during high electricity use periods. The Cos Cob project is consistent with NRG's "Repowering Connecticut with NRG" plan which was

first announced in 2006 and demonstrates NRG's commitment to Connecticut and to providing reliable and environmentally responsible energy to the region.

Additionally, a repowering project proposed by the 50/50 partnership between NRG Energy, Inc. and The United Illuminating Company ("UI") was chosen by the DPUC in June to add approximately 200 megawatts of new peaking generation at NRG's existing Devon plant in Milford, CT. The recently conducted DPUC 'peaking generation' RFP was a result of the 2007 Energy Legislation which called for the DPUC to conduct a competitive bid process for new peaking generation. The new Devon peaking plant, which will provide power to all Connecticut residents during peak usage periods, is scheduled to be in operation by June 1, 2010. This project is good news for Connecticut ratepayers. Building this plant will reduce costs for electric customers during peak periods, improve reliability and decrease reliance on older, less efficient units.

GENERATION RETIREMENT ASSUMPTIONS:

Page 27 of the CSC draft report (2008 Ten Year Forecast of Connecticut Electric Loads and Resources) issued by the CSC on July 10<sup>th</sup> referenced the Draft Integrated Resource Plan ("IRP") prepared on behalf of the Connecticut Energy Advisory Board ("CEAB") by the Utilities Pursuant to PA 07-242 dated January 1, 2008. Specifically, the CSC report on page 27 refers to the conclusion in the January 1, 2008 IRP draft that states that the "IRP does not forecast any retirements of existing generation units." NRG would like to note that the IRP 'Supplemental Analysis' (which was prepared by the Utilities following a rigorous stakeholder working group process under the direction of

the Connecticut Energy Advisory Board) approved by the CEAB on August 1<sup>st</sup>, now assumes that anticipated environmental regulations will likely force retirement of older, less efficient fossil generating units during the planning horizon. Page 32 of the revised, final Integrated Resource Plan approved by the CEAB and provided to the DPUC on August 1<sup>st</sup> 2008 states the following:

“The supplemental analysis shows that a substantial portion of existing Connecticut generation could become economically obsolete over the next ten years due in part to changing environmental regulations. While the CEAB recommends that Connecticut not immediately solicit replacement capacity within Connecticut at this time, the CEAB believes it important to highlight the potential implications of future generation retirements.”

NRG respectfully submits that the final CSC report should be consistent with the revised final Integrated Resource Plan and Supplemental Analysis which will be reviewed by the DPUC in Docket No. 08-07-01 - DPUC Review Integrated Resource Plan.

### CONCLUSION

NRG thanks the CSC for soliciting comments on its Draft Report and looks forward to a continuing dialogue with the Council and other state policymakers on ways to best meet the needs of Connecticut consumers for adequate supplies of cleaner, more dependable electricity generation that can stabilize electricity prices.