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August 14, 2009

VIA HAND DELIVERY

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

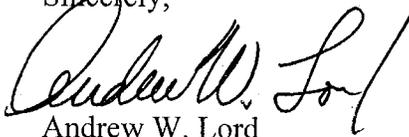
Re: Docket No. F-2009
Review of the Ten-Year Forecast of Electric Loads and Resources

Dear Mr. Phelps:

Enclosed please find NRG Energy, Inc.'s comments on the 2009 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

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**Comments of NRG Energy, Inc. on the Connecticut Siting Council
Draft 2009 Forecast of Loads and Resources - Docket F-2009**

NRG Energy, Inc. ("NRG") hereby submits its comments on the Draft 2009 Forecast of Loads and Resources (the "Draft Report") issued by the Connecticut Siting Council ("CSC" or the "Council") on July 13, 2009 in the above-referenced proceeding. As an active participant in this proceeding (responding to pre-hearing interrogatories and providing oral testimony before the Council on July 15, 2009), NRG commends the CSC for its efforts in gathering and analyzing the information provided to it by stakeholders representing diverse interests. NRG believes that the Draft Report, for the most part, provides a balanced analysis of the information provided. However, NRG takes issue with one assumption within the Draft Report: namely, the inclusion of each of the proposed phases of the New England East West System ("NEEWS") transmission project. NEEWS has been neither fully permitted nor approved. Accordingly, NRG urges the Council to exclude NEEWS as a "likely resource" for planning purposes

In the Draft Report, the CSC references the relatively new integrated planning process mandated by Public Act 07-242, An Act Concerning Electricity and Energy Efficiency ("PA 07-242"). PA 07-242 requires the Connecticut Energy Advisory Board ("CEAB") to review annually a resource assessment and procurement plan, or "Integrated Resource Plan" ("IRP") submitted to it by the state's electric distribution companies ("EDCs"): The Connecticut Light and Power Company ("CL&P") and The United Illuminating Company ("UI").

The CSC clearly notes the significance of the IRP in the overall energy planning process in Connecticut in the Introduction to the Draft Report:

CL&P and UI were mandated by the [PA 07-242] to create an [IRP] that they could agree to jointly and present as a new kind of planning tool for the state. The IRP focuses on resource procurement. Its most important features, to be discussed below in more detail, are its **coordinated** approach to procurement and its emphasis on energy efficiency. In the end, all of Connecticut's and New England's plans for the future of the electric system are designed to **make changes in the system happen more smoothly**, so electric service will not be disrupted, and more efficiently, so electric service will be worth its price.

Draft Report at 2 (emphasis added).

In January 2009, the EDCs submitted to the CEAB the 2009 IRP, prepared by The Brattle Group on behalf of the EDCs. NRG has submitted extensive comments on the 2009 IRP. These comments have focused on a variety of issues related to the assumptions reflected in the base case of the 2009 IRP, including the inappropriateness of including each of the proposed phases NEEWS as likely resources in the forecast. Similarly, in this proceeding, NRG objects to the inclusion of the NEEWS projects as reflected in the Draft Report which considers all phases of the proposed NEEWS project as a likely resource for planning purposes. Draft Report at 16 and 28.

The CEAB issued modifications to the 2009 IRP on May 1, 2009 entitled "2009 Comprehensive Plan for the Procurement of Energy Resources" (the "CEAB Plan"). The CEAB Plan set forth the CEAB's detailed findings and recommendations regarding the EDCs' 2009 IRP. With respect to NEEWS, the CEAB stated:

... the CEAB has identified modifications to several of the [2009] IRP background reports, findings and recommendations as precursors to the 2010 Planning cycle and takes specific exception to some findings and conclusions contained in the [2009] IRP. ... Therefore, except as identified herein the CEAB is not accepting,

endorsing or approving the facts and findings of the EDC Report.

* * *

Transmission: CEAB finds that neither NEEWS transmission projects nor any transmission projects are exempt from IRP scrutiny; transmission is a critical component of the IRP process. The CEAB also finds that it is premature to conclude that no practical alternatives to the Greater Springfield Reliability Project exist, as the needs assessment for that component of NEEWS is under review by ISO-New England at this time.

CEAB Plan at 3.

Furthermore, the CEAB explicitly opined that the NEEWS component projects should not be considered as part of the base case for planning purposes, and that transmission projects in general should be subject to review and comparison with alternatives in the IRP process:

The CEAB does not endorse the notion that the NEEWS transmission projects or any transmission projects are exempt from IRP scrutiny of the costs and benefits of these projects simply because they are included in the Regional System plan as recommended by the EDCs on Pages ES-8, 4.2 and 4-43. In particular, the CEAB specifically rejects the EDCs' findings on pages ES-8 and 4-32-33, that "No practical non-transmission alternatives exist for either the Greater Springfield Reliability Project ("GSRP") or the Rhode Island Reliability Project ("RIRP") components of NEEWS.

CEAB Plan at 33.

In the Draft Report, the CSC makes reference to several assumptions about the NEEWS project that are inconsistent with the CEAB's recommended modifications to the 2009 IRP. The Council found that:

[g]oining forward, the hypothetical loss of generation due to retirements could largely be cancelled out by the increase

in import capacity should the [NEEWS] project, in several components, be approved.

Draft Report at 16.

Based on the CEAB recommendations to modify the 2009 IRP, and given the failure of the 2009 IRP to analyze non-transmission alternatives for the various phases of NEEWS, it is premature to assume that NEEWS as proposed is the resource that will provide the greatest consumer benefits and or that it will ultimately be chosen as the appropriate resource to replace generation lost due to retirements. Additionally, the CEAB Plan recognized the statutory directive set forth in Conn. Gen. Stat. § 16a-3a that gives preference to existing generation in the resource planning process:

The procurement plan shall consider: (1) Approaches to maximizing the impact of demand-side measures; (2) the extent to which generation needs can be met by renewable and combined heat and power facilities; (3) the optimization of the use of generation sites and generation portfolio existing within the state; (4) fuel types, diversity, availability, firmness of supply and security and environmental impacts thereof, including impacts on meeting the state's greenhouse gas emission goals; (5) reliability, peak load and energy forecasts, system contingencies and existing resources availabilities; (6) import limitations and the appropriate reliance on such imports; and (7) the impact of the procurement plan on the costs of electric customers.

Conn. Gen. Stat. § 16a-3a(d) (emphasis added). Hence, an IRP should consider the economics of all alternatives, including repowering of existing generation, to determine which alternative would provide the most cost effective solution for Connecticut consumers.

In the Section of the Draft Report entitled “Import Capacity”, referring to NEEWS, the CSC states:

Looking ahead, CL&P is developing a transmission upgrade plan that would increase the state’s import capacity to approximately 45 percent of peak demand. This plan would significantly increase the reliability of Connecticut’s supply system and allow for greater import of economical supply.

Draft Report at 28.

As recognized by the CEAB in evaluating the 2009 IRP, the CSC should not presume that NEEWS will be approved or built, or that it represents the most cost-effective solution to meet Connecticut’s future energy needs. Nevertheless, the Draft Report dedicates an entire page to describing the potential benefits of the various phases of the proposed NEEWS transmission project (Draft Report at 39), while non-transmission alternatives that may ultimately provide greater consumer benefits have yet to be studied and are not discussed.

NRG respectfully submits that the most economic resource solutions to meet the potential need has yet to be determined through the process envisioned by the legislature and outlined in PA 07-242. The CSC’s final resource planning assumptions for the 2009 Forecast should not presume that any resource without siting approval or without contractual commitments should be included as anything other than an option to be considered, and should emphasize the IRP process as the appropriate forum to identify, evaluate and determine what resources will comprise the correct solution for Connecticut, as is required by PA 07-242.

CONCLUSION

NRG again 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 the means to best meet the needs of Connecticut consumers for adequate supplies of clean, dependable electricity generation for the most economic investment to Connecticut consumers.

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

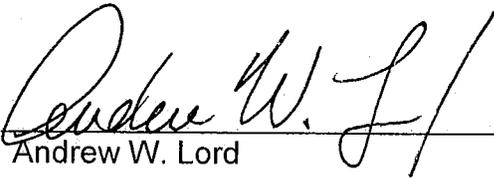
REVIEW OF THE TEN YEAR FORECAST OF : DOCKET NO. F-2009
ELECTRIC LOADS AND RESOURCES :
: August 14, 2009

CERTIFICATE OF SERVICE

I hereby certify that NRG Energy Inc.'s comments on the above-referenced docket were sent via U.S. First Class Mail or electronically to the parties and intervenors listed on the attached service list.

Respectfully submitted,

NRG ENERGY, INC.

By: 
Andrew W. Lord

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Its Attorneys

F-2009
Connecticut Ten-Year Forecast of Electric Loads and Resources
LIST OF PARTIES AND INTERVENORS
SERVICE LIST

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<p style="text-align: center;">Party (granted on April 7, 2009)</p>	<p><input checked="" type="checkbox"/> E-mail</p> <p><input type="checkbox"/> E-mail or <input checked="" type="checkbox"/> U.S. Mail</p> <p><input checked="" type="checkbox"/> E-mail or <input type="checkbox"/> U.S. Mail</p>	<p>Dominion Nuclear Connecticut, Inc.</p>	<p>Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 860-275-8299 860-275-8345 kbaldwin@rc.com</p> <p>Daniel A. Weekley Managing Director Northeast Government Affairs Dominion Resources Services, Inc. Rope Ferry Road (Route 156) Waterford, CT 06385 860-440-2065 860-444-5271 Daniel.a.weekley@dom.com</p> <p>Lillian M. Cuoco, Esq. Senior Counsel Dominion Resources Services, Inc. RS 2 120 Tredegar Street Richmond, VA 23219 804-819-2183 804-819-2684 Lillian.cuoco@dom.com</p>
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Party (granted on April 7, 2009)	<input type="checkbox"/> E-mail or <input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> E-mail or <input checked="" type="checkbox"/> E-Mail	The Connecticut Light and Power Company (CL&P)	Christopher R. Bernard Manager – Regulatory Policy (Transmission) Northeast Utilities Service Company] 107 Selden Street Berlin, CT 06037 (860) 665-5967 (860) 665-3314 – fax bernacr@nu.com Stephen Gibelli Associate General Counsel Northeast Utilities Service Company 107 Selden Street Berlin, CT 06037 (860) 665-5513 (860) 665-5504 – fax gibels@nu.com
Party (granted on April 23, 2009)	<input type="checkbox"/> E-mail or <input checked="" type="checkbox"/> U.S. Mail	The Department of Public Utility Control (DPUC)	Ginger Teubner Research & Policy Unit Department of Public Utility Control Ten Franklin Square New Britain, CT 06051 (860) 827-2630 (860) 827-2789 Ginger.teubner@po.state.ct.us
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Party (granted June 4, 2009)	<input checked="" type="checkbox"/> U.S. Mail	NRG Energy, Inc., NRG Power Marketing, Inc (NRG PMI), Connecticut Jet Power LLC, Devon Power LLC, Middletown Power LLC, Montville Power LLC, Norwalk Power LLC, and Meriden Gas Turbines LLC (collectively, the "NRG Companies" or NRG)	Julie L. Friedberg NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540-6213
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