

# Holland & Knight

31 West 52nd Street | New York, NY 10019 | T 212.513.3200 | F 212.385.9010  
Holland & Knight LLP | www.hklaw.com

Stephen J. Humes  
(212) 513-3473  
steve.humes@hklaw.com

March 9, 2016

Robert Stein  
Chairman – Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

Re: Petition of PSEG Power Connecticut LLC for a Declaratory Ruling to Approve the Installation and Operation of a Combined Cycle Electric Generating Facility at Bridgeport Harbor Station, Bridgeport, Connecticut

Dear Chairman Stein:

Pursuant to Section 16-50k of the Connecticut General Statutes and Sections 16-50j-38 to 16-50j-40 of the Regulations of Connecticut State Agencies, PSEG Power Connecticut LLC (“PSEG”) hereby files the attached Petition for Declaratory Ruling to Approve the Installation and Operation of a Combined Cycle Electric Generating Facility at Bridgeport Harbor Station, Bridgeport, Connecticut (“Petition”). PSEG is seeking approval from the Connecticut Siting Council to install and operate a new combined cycle electric generating facility (“Project”) at 1 Atlantic Street, Bridgeport, Connecticut (the “Site”). PSEG’s Project will be located at approximately 41°10’ 8” N, 73°10’ 55” W, which is an existing electric generating station that has been operating to supply electric power to the region since 1957. The Project will be operated as an independent power production facility (i.e., a non-utility wholesale generator) in the wholesale electric power markets operated by ISO New England.

The Project will be located at Bridgeport Harbor Station adjacent to an existing coal-fired power plant. Further, as described more fully in the Petition, due to its location, configuration, low emissions from use of natural gas or ultra-low sulfur distillate fuel, modern emission control technology, storm resiliency enhancements, and environmental benefits to the community, the Project will not have any substantial adverse environmental effects. As a result of a Community Environmental Benefit Agreement that PSEG recently entered into with the City of Bridgeport and various community groups, PSEG is committed to retiring the existing coal-fired power plant by July 1, 2021, assuming the new Project receives all necessary permits and approvals.

Enclosed with this original submittal are fifteen (15) copies of this Petition along with the required filing fee of \$625.00. Also attached please find a copy of the written notice that has been provided to the abutters of the Project, the Mayor of the City of Bridgeport, along with the list of public officials identified in Conn. Gen. Stat. §16-50j(g).

Also enclosed please find the following documents filed as bulk:

1. A full size of the Preliminary Site Development Plans (smaller size documents are attached as Exhibit B);
2. A copy of the full Air Permits application package as submitted to CT DEEP on March 2, 2016; and
3. A copy of the full municipal consultation Technical Report as submitted to the City on November 13, 2015.

Please do not hesitate to contact me at (212) 513-3473 should you have any questions regarding this request. We will contact your office in the near term to finalize scheduling of the appropriate reviews.

Sincerely yours,

HOLLAND & KNIGHT LLP

A handwritten signature in blue ink, appearing to read "Stephen J. ..." with a long horizontal flourish extending to the right.

Enclosures

cc: Mayor Joseph P. Ganim  
Leilani Holgado, Esq., PSEG  
Jeffrey J. Pantazes, AKRF, Inc.  
Anthony Foster, RCM Technologies

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

PETITION OF PSEG POWER CONNECTICUT LLC  
FOR A DECLARATORY RULING TO APPROVE  
THE INSTALLATION AND OPERATION OF A  
COMBINED CYCLE ELECTRIC GENERATING  
FACILITY AT  
BRIDGEPORT HARBOR STATION  
BRIDGEPORT, CONNECTICUT

Submitted on behalf of:

PSEG POWER CONNECTICUT LLC

Submitted by:

Holland & Knight, LLP  
Attention: Stephen J. Humes, Esq.  
31 West 52<sup>nd</sup> Street  
New York, New York 10019  
Phone: (212) 513-3473  
[steve.humes@hklaw.com](mailto:steve.humes@hklaw.com)

Submitted on: March 9, 2016

PSEG POWER CONNECTICUT LLC  
PETITION FOR DECLARATORY RULING

Table of Contents

	<u>Page</u>
I. INTRODUCTION AND EXECUTIVE SUMMARY.....	1
A. Statutory Authority and Compliance with Council Requirements .....	1
B. Project Overview .....	3
1. Need for the Facility .....	3
2. Site and Project Description.....	3
3. Potential Environmental Impacts .....	7
C. Applicant Information.....	11
D. Summary of Community Outreach and Municipal Agreement.....	12
II. DESCRIPTION OF THE PROJECT.....	14
A. Site Description.....	14
B. Visual Impact Environmental Compatibility .....	16
C. Air Emissions Impacts .....	18
D. Other Potential Impacts.....	20
1. Noise Impacts.....	20
2. Visual Impacts .....	20
3. Traffic Impacts .....	20
4. Historic and Archaeological Resources .....	21
5. Natural Resources .....	21
6. Water Resources .....	22
III. STAKEHOLDER CONSULTATIONS .....	22
IV. ENVIRONMENTAL JUSTICE ACT COMPLIANCE .....	24
V. COMPLIANCE WITH C.G.S. § 16-50ii.....	26
VI. CONCLUSION.....	26

## **LIST OF EXHIBITS**

**EXHIBIT A** Land Use and Environmental Information Report Prepared by AKRF, Inc.  
(Revision 1)

**EXHIBIT B** Preliminary Site Development Plans

- Figure B-1 General Arrangement (0102)
- Figure B-2 Stormwater Drainage Plan (0103-1)
- Figure B-3 Area of Disturbance/Limits of Disturbance Plan (0104)
- Figure B-4 Grading Plan (0105)
- Figure B-5 South and East Elevations (0106)
- Figure B-6 Utility Plan (0107-1)
- Figure B-7 Phasing Plan (0108)
- Figure B-8 Identification of Laydown Areas (0109)
- Figure B-9 Landscape/Restoration Plan (0110)
- Figure B-10 Lighting Plan – Point to Point (0111-1)
- Figure B-11 Stormwater Management Plan Pre-Development Plan (0112)
- Figure B-12 Soil Erosion and Sediment Control Plan (0113-1)
- Figure B-13 Soil Erosion and Sediment Control Details (0113-2)

**EXHIBIT C** Electrical One-Line Drawing

**EXHIBIT D** Excerpts from Air Permits Applications to Connecticut Department of Energy & Environmental Protection

**EXHIBIT E** List of Permits and Approvals Needed for Project

**EXHIBIT F** Coastal Consistency Review Form

**EXHIBIT G-1** Community Environmental Benefits Agreement (with City of Bridgeport and Community Groups)

**EXHIBIT G-2** Press Release Announcing Signing of Community Environmental Benefits Agreement

**EXHIBIT H** Municipal Consultations: Technical Report, November 13, 2015

**EXHIBIT I** Connecticut Department of Energy & Environmental Protection Approval of the Environmental Justice Public Participation Plan dated August 15, 2014

**EXHIBIT J** Environmental Justice Plan Final Report dated August 11, 2015

**EXHIBIT K** Construction Schedule

**EXHIBIT L** Abutters Map and List of Abutters Notified of Filing

**EXHIBIT M** List of Public Officials Notified of Filing



The Project is eligible for approval by declaratory ruling pursuant to C.G.S. § 16-50k(a) because it consists of an electric generating unit that will be located at a site where an electric generating facility existed prior to July 1, 2004.<sup>1</sup> Further, due to its location, configuration, low emissions from use of natural gas or ultra-low sulfur diesel (“ULSD”) fuel, modern emission control technology, storm resiliency enhancements, and environmental benefits to the community,<sup>2</sup> the Project will not have any substantial adverse environmental effects.

In compliance with the Council’s directive on Construction Deadlines,<sup>3</sup> PSEG respectfully requests that if the Council deems it appropriate to grant this Petition, it order the construction deadline for the Project to be three years from the date of Connecticut Department of Energy and Environmental Protection’s (“CT DEEP”) issuance of the final air permits for this Project, after all applicable appeal periods have lapsed or been exhausted.

In compliance with the Council’s directive on Notice Requirements,<sup>4</sup> PSEG has attached as Exhibit L an abutters map and a list of abutters to be notified of this Petition filing.<sup>5</sup> Proof of such notice mailing will be provided to the Council within 30 days of this Petition filing. PSEG is also providing notice of this Petition filing to those entities and individuals delineated under C.G.S. § 16-50l, and the list of recipients of such notice is attached in Exhibit M. Proof of such notice of mailing will be provided to the Council within 30 days of this Petition filing.

---

<sup>1</sup> C.G.S. § 16-50k(a) provides in relevant part as follows: “[t]he council shall, in the exercise of its jurisdiction over the siting of generating facilities, approve by declaratory ruling (A) the construction of a facility solely for the purpose of generating electricity, other than an electric generating facility that uses nuclear materials or coal as fuel, at a site where an electric generating facility operated prior to July 1, 2004, . . . unless the council finds a substantial adverse environmental effect. . . .”

<sup>2</sup> As discussed more fully below, one substantial environmental benefit the Project provides is PSEG’s commitment, as a result of the successful conclusion of the environmental justice process, to permanently close the coal-fired generating station (Unit 3) at the Site by July 1, 2021.

<sup>3</sup> See “Petitions for Declaratory Rulings – Construction Deadlines” memorandum of the Council dated May 29, 2015 at: <http://www.ct.gov/csc/lib/csc/guides/petitionconstdeadline052915.pdf#56960>.

<sup>4</sup> See “Petitions for Declaratory Rulings – Notice Requirements” memorandum of the Council dated March 16, 2015 at: <http://www.ct.gov/csc/lib/csc/guides/guides2015/20150316-memo-penoticerequirements.pdf#56864>.

<sup>5</sup> PSEG also included a broader list of abutters to include abutters in the area of the proposed laydown area.

## **B. Project Overview**

### **1. Need for the Facility**

PSEG operates Bridgeport Harbor Station (“BHS”) and other generating facilities at New Haven Harbor Station (“NHHS”) in the wholesale capacity and energy markets operated by ISO-NE, which also operates the regional electric transmission system throughout New England. PSEG is proposing to add power generating capacity in the region, as current market signals have indicated that new generating capacity is required to ensure electric system reliability and to replace recently retired system assets. ISO-NE operates annual forward capacity auctions (“FCAs”) to solicit generating resources to meet its anticipated need. The latest FCA, known as FCA #10, was conducted on February 8, 2016. PSEG was notified on February 10, 2016 that the Project has been selected to provide both energy and capacity beginning June 1, 2019 consistent with the purchasing needs of ISO-NE. ISO-NE has therefore determined that there is a need for the Facility consistent with the design of the wholesale market which procures resources for reliability of the transmission system. PSEG has thus been awarded a capacity obligation of approximately 485 MW. This award requires PSEG to complete construction of the Facility and achieve commercial operation by June 1, 2019. PSEG is proceeding expeditiously to obtain all necessary regulatory permits and approvals to ensure that it can commence and complete construction in time to meet its obligations to ISO-NE as a capacity and energy resource interconnected to the transmission system.

### **2. Site and Project Description**

The Site consists of approximately 58.8 acres on Bridgeport Harbor just south of Bridgeport’s transportation center and ferry terminal. See Exhibit A, Figures 1-1 and 1-2. Two existing generating units at the Site supply ISO-NE with about 400 MWs of power (current summer rating), or enough power to supply electric capacity and energy to approximately half a

million residential customers. BHS's existing operating units include Unit 3,<sup>6</sup> which runs primarily on coal and uses fuel oil for startup, and Unit 4, a jet-fueled combustion turbine peaking unit.

The Facility will be built on the southerly portion of the Site in an area currently occupied by four fuel oil storage tanks. As a separate project (the "Unit 3 Tank Project"), PSEG plans to remove the existing No. 6 fuel oil tanks at the tank farm and construct a replacement fuel oil storage tank to the north of the Facility, closer to Unit 3. The existing tank farm area will be remediated prior to construction of the Project. See Exhibit A, Figures 1-3a and 1-3b. In a Notice of Exempt Modification filed on February 5, 2016, PSEG notified the Council of the Unit 3 Tank Project, a separate plan to remove the four existing No. 6 fuel oil storage tanks and three smaller underground fuel oil storage tanks and perform limited Site remediation in accordance with the CT DEEP-approved Revised Remedial Action Plan dated August 2004. The Council issued a letter on March 1, 2016 acknowledging the Exempt Modification of Unit 3.

The Facility will consist of a 485 MW dual fuel combined-cycle power plant. A combined-cycle power plant uses both a gas and a steam turbine together to produce more electricity from the same fuel. The plant will include a combustion turbine (similar to a very large jet engine), a heat recovery steam generator ("HRSG"), and a steam turbine to generate electricity. The combustion turbine will use natural gas or ULSD fuel oil to generate electricity. Waste heat from the combustion turbine will be routed through the HRSG to create steam, powering the steam turbine and generating additional power. Using the waste heat from the combustion turbine to generate even more electricity makes a combined-cycle plant very

---

<sup>6</sup> On January 11, 1983, the Council approved the current configuration of Unit 3 in Docket No. 27, *An Application of the United Illuminating Company for a Certificate of Environmental Compatibility and Public Need for the Modification of Bridgeport Harbor Unit No. 3 to Capability to Burn Either Low-Sulfur Coal or Oil*.

efficient. The Facility will primarily run on natural gas, with provisions to use ULSD for up to 30 days per year as a back-up fuel, ensuring fuel diversity and dependability.

PSEG has selected a GE 7HA.02 gas turbine for the project. The GE turbine is an industry-leading, high-efficiency, air-cooled gas turbine, with more than 59% combined-cycle efficiency, enabling highly cost-effective conversion of fuel to electricity. Additionally, the Project design incorporates an air-cooled condenser to minimize the Facility's operational water requirements, and eliminates the need to use harbor water for cooling, thereby avoiding surface water requirements and impacts. Aquarion Water Company, the local water utility, will supply the Facility's water requirements. Wastewater will be discharged to the Bridgeport Water Pollution Control Authority facility. See Exhibit B, Figure B-1 for a preliminary Site development plan for the proposed Facility and related improvements.<sup>7</sup>

The new Project's generating equipment will be installed on approximately 16 acres of previously disturbed land within the Site. As the Project is proposed to be built on the property of an existing generating station on a previously disturbed industrial site, environmental impacts are minimized as compared to the development of a similar project on a "greenfield" site.

As an additional reliability measure, and to provide storm hardening for this critical waterfront energy infrastructure, the elevation of the Project Site will be raised by approximately 7 to 10 feet, to above the existing 500-year Federal Emergency Management Agency flood level. Grade changes will be accomplished through use of structural retaining walls and import of fill.

This application also includes rehabilitation of the existing fuel dock terminal facility at BHS, which was damaged during Superstorm Sandy on October 29, 2012, to allow for future

---

<sup>7</sup> Exhibit B contains a complete set of the preliminary Site development plans with individual sheets labelled Figures B-1 through B-13.

fuel oil deliveries by barge.<sup>8</sup> The existing oil dock was designed for oil tankers much larger than those necessary to support the new Facility, so the rehabilitation to the existing dock will involve demolishing and removing portions of the existing timber walkways, rehabilitating existing platforms, piers, and mooring dolphins, constructing new walkways and upgrading and replacing existing fender units and mooring hardware. No new piers are necessary and the length of the walkway will be reduced to approximately 40% of the current dock configuration. See Exhibit A for a more detailed description of the preliminary dock repair plan.<sup>9</sup>

All construction will be in accordance with applicable local and state construction standards and conditions of the regulatory approvals to be obtained for the Project. The scope includes all Site preparation, installation of subsurface utilities and foundations, and installation of the new combined cycle Facility equipment and necessary ancillary equipment, including required electrical and municipal interconnections.

The Southern Connecticut Gas Company (“SCG”) operates an existing high pressure natural gas lateral pipeline connection adjacent to the Site which terminates at the Emera Bridgeport Energy power plant at 10 Atlantic Street. This gas pipeline was installed at the time the Emera Bridgeport Energy plant was constructed and has operated continuously since that time. This existing pipeline is capable of delivering natural gas for the Project through a new take-off connection using a high-pressure natural gas service lateral line. PSEG is negotiating appropriate natural gas service arrangements with SCG. PSEG signed a Large Generator Interconnection Agreement (“LGIA”) with ISO-NE and The United Illuminating Company

---

<sup>8</sup> PSEG explained during its environmental justice public outreach process, described in detail herein, and in its Technical Report to the City of Bridgeport (see Exhibit A and Exhibit H) that it will use barge deliveries where feasible to reduce the potential environmental impact of excessive truck traffic through residential areas in the vicinity of the Site.

<sup>9</sup> See Exhibit A, Figures 1-3b and 1-4b for illustrations. Exhibit A contains narrative discussions of the dock repair and its potential environmental affects on pages 1-2, 5-2, 7-2, 8-2 and 10-3 to 10-6.

(“UI”). Under the terms of this agreement, PSEG will construct, own and operate a single radial 345-kV underground transmission cable electrically interconnecting the Project with UI. The Project includes the installation of two 345-kV generator step up transformers and a 345-kV collector bus with gas-insulated substation equipment prior to connection of the generator lead to UI’s facilities.<sup>10</sup> The generator lead will run underground to UI’s substation, thereby eliminating any potential environmental impact of additional overhead lines in the area. Connecting to UI’s substation will require some limited construction to install the generator lead underground in the public right of way. PSEG expects to obtain the necessary street opening permits from the City of Bridgeport (the “City”) and has obtained UI’s consent through the LGIA to allow such interconnection to its substation. See Exhibit B, Figure B-1 for the general arrangement of these and other facilities.<sup>11</sup>

### 3. Potential Environmental Impacts

Potential impacts from the proposed Facility will be minimized and made insignificant by good engineering practice and Facility design, installation of state-of-the-art air quality control technology for air emissions, best management practices for reducing potential impacts on water resources and water quality, minimization of truck traffic as much as possible through nearby residential neighborhoods,<sup>12</sup> mitigation measures for noise, and use of natural gas as the primary fuel, with ULSD permitted for up to 30 days per year. The potential for environmental impacts and impacts on the nearby community will also be reduced by locating the Facility at the Site of an existing power generating station. The selected location for the Facility allows the Project to take advantage of existing infrastructure, thereby reducing potential construction emissions and

---

<sup>10</sup> See Exhibit C for an electrical one-line drawing depicting the electrical facilities.

<sup>11</sup> The generator step up transformers are labeled as item #3 and the GIS facility is labeled as item #10 on Figure B-1.

<sup>12</sup> The nearest residential area is approximately 900 feet from the BHS Site.

impacts. The Facility is not expected to cause any health-related impacts because the Facility will be designed, permitted and operated to comply with ambient air quality and water quality standards promulgated to protect environment and human health, including the sensitive subpopulations of children and the elderly.

The proposed Facility will be located within an industrial zone surrounded by other energy infrastructure, including the Emera Bridgeport Energy power plant and UI's Singer substation.<sup>13</sup> Approximately 1,100 feet to the southwest of the Site is a recreational park owned by the City (Seaside Park) with several playing fields and recreation areas. Southwest and west of the Site is the University of Bridgeport's ("UB") campus, approximately 1,400 feet away. North of the Site, more than 2,000 feet from the Combined-Cycle Facility, are the Harbor Yard Ballpark and Webster Bank Arena at Harbor Yard, which includes several parking lots in the surrounding City blocks. The nearest residence is approximately 900 feet away from the Project Site.

The potential environmental impacts of the proposed Facility have been minimized by the following efforts and actions:

- Agreeing to retire the existing Unit 3 coal-fired power plant by July 1, 2021 as part of the Community Environmental Benefits Agreement (the "CEBA");
- Locating the Facility at the Site of an existing power generating station that is zoned for industrial activity, which will allow the Facility to benefit from existing energy infrastructure thereby reducing potential construction impacts;

---

<sup>13</sup> See [Exhibit A](#), Figure 2-2a and Figure 2-2b for a depiction of the land uses surrounding the BHS.

- Employing advanced state-of-the-art and efficient electric generation technology, which will result in lower emissions per MWh produced than older, less efficient units;
- Relying primarily on natural gas as fuel, with up to 30 days of ULSD fuel use;
- Installing state-of-the-art air quality emission control technology including Dry Low nitrogen oxide (“NO<sub>x</sub>”) burners, water injection, and selective catalytic reduction with an oxidation catalyst to substantially reduce air emissions;
- Employing an exhaust stack design with reduced potential ground-level air quality impacts to comply with all applicable state and National Ambient Air Quality Standards (“NAAQS”);
- Using an air cooled condenser to completely eliminate the need for surface water withdrawals from Bridgeport Harbor, provide cooling for the steam turbine, eliminate discharge of any heated cooling water to Bridgeport Harbor and eliminate the emission of particulate matter associated with evaporative condenser cooling systems;
- Supplying barge delivery of equipment and materials during construction, where practicable, to reduce truck travel through nearby residential neighborhoods and delivery of ULSD by barge upon completion of the fuel oil dock repairs; and
- Designing and operating the Facility to meet applicable State of Connecticut (the “State”) and City noise regulations.

Access to the Site is limited for security reasons with routine traffic entering through the gate at Atlantic Street. Vehicle traffic (including heavy trucks and employee commuters) accessing the Site will most likely use Interstate 95 at Interchanges 26 or 27. Traffic accessing the Site from I-95 northbound will exit the Interstate and enter the industrial area by heading

south on either Lafayette Street or Broad Street. Traffic traveling on I-95 southbound to the Site will exit at Interchanges 26 or 27 and head south on Broad Street before entering the industrial area. During the construction phase of the Project, truck traffic could potentially increase along Broad Street, Lafayette Street and Atlantic Street depending on which direction vehicles will travel to and from the Site. During construction, certain trucks requiring high clearance would access the site via I-95 Exit 26 onto Pine Street, to Admiral Street, Iranistan Avenue, and to the Site entrance on Atlantic Street. Trucks leaving the Site would take Atlantic Street to Main Street, Broad Street, Gregory Street, Iranistan Avenue, and Washburn Street, to I-95 at Wordin Avenue.

Existing ambient background noise levels in the direct vicinity of the Site are typical for industrial areas with significant industrial activity including a large amount of heavy truck activity throughout the day and substantial background traffic noise from I-95. Within the nearby residential neighborhoods, ambient background noise levels are typical of city areas. Noise sources identified in the area include industrial activity, vehicle traffic along I-95 and local roadways, rail traffic along the adjacent Northeast Corridor / Metro North rail line, and Bridgeport-Port Jefferson Ferry operations at the waterfront, among other marine activities.<sup>14</sup>

With regard to air pollutant emissions, the Project will be equipped with a Dry Low NO<sub>x</sub> combustion system, water injection and Selective Catalytic Reduction technology to reduce NO<sub>x</sub> emissions and an oxidation catalyst to reduce carbon monoxide (“CO”) and volatile organic compound (“VOC”) emissions. *Permits to Construct and Operate* (the “Air Permits”) are required from CT DEEP under RCSA § 22a-174-3a and will be obtained. PSEG filed its “Prevention of Significant Deterioration (“PSD”) Pre-Construction Permit Application on

---

<sup>14</sup> See [Exhibit A](#), Figure 6-1 for a depiction of noise survey locations.

November 13, 2014, which is currently being revised.<sup>15</sup> PSEG has filed for a non-minor modification of the existing Title V Air Permit for Bridgeport Harbor Station along with applications for a Clean Air Interstate Rule and Acid Rain Permits. See Exhibit D for selected excerpts of the revised air permit application.<sup>16</sup> The Project will be a non-minor modification to BHS. Dispersion modeling using the Environmental Protection Agency (“EPA”) models concludes that the Project emissions, except for the pollutant nitrogen dioxide (“NO<sub>2</sub>”), will produce ambient air quality impacts less than the Significant Impact Levels (“SIL”) and therefore will comply with the NAAQS, Connecticut Ambient Air Quality Standards (“CAAQS”) and Allowable PSD increment concentrations.<sup>17</sup> For NO<sub>2</sub>, additional dispersion modeling is being performed to assess compliance with the NAAQS. This modeling will be submitted to the CT DEEP.

The Project will not have a substantial adverse effect on coastal or water resources because the Project will be sited at an existing electric generating facility, will not involve water intake from or discharges to Bridgeport Harbor, and will use best management practices for erosion and sedimentation control. Attached as Exhibit F is a copy of the “Coastal Consistency Review Form” expected to be submitted to CT DEEP in April 2016.

**C. Applicant Information**

PSEG Power Connecticut LLC is the Connecticut operating company subsidiary of PSEG Fossil LLC, which itself is wholly owned by PSEG Power LLC. PSEG will operate the Project upon completion of development. PSEG and its related companies have more than 100

---

<sup>15</sup> Due to technical modifications GE made to the specifications for the 7HA.02 turbine generator equipment after the initial air permit application filing was made to CT DEEP in 2014, PSEG filed an amended air permit application with CT DEEP.

<sup>16</sup> Exhibit D includes the Air Permits application and Attachments A-D. A copy of the full Air Permits application package as submitted to CT DEEP was filed with the Council in bulk.

<sup>17</sup> Exhibit E contains a list of all permits and approvals needed for the Project.

years of experience in generating and delivering electricity. PSEG's presence and demonstrated experience in the State are evident in the BHS and NHHS facilities, which together provide over 1,000 MW in Connecticut. PSEG and its affiliates developed and operate three peaking units at NHHS, a project which was approved by the Council in Petition No. 976 on December 16, 2010 and achieved commercial operation on June 1, 2012. Further, PSEG has experience as a full participant in ISO-NE markets and its representative is the current Chairman of the New England Power Pool Participants Committee. PSEG's environmental history in Connecticut demonstrates its commitment to the community and the environment while providing outstanding energy services. PSEG helped develop and actively supported the enactment of mercury emissions control legislation in Connecticut, completed a \$160 million baghouse upgrade at BHS in 2008, and has been a participant and supporter of the Regional Greenhouse Gas Initiative and other climate change legislation.

**D. Summary of Community Outreach and Municipal Agreement**

As set forth in detail in Sections III and IV below, PSEG has undertaken comprehensive community and municipal outreach in the City over the last eighteen months, including complying fully with C.G.S. § 22a-20a, the Connecticut Environmental Justice Act (the "EJ Act"). As a result of PSEG's successful consultations with City officials and community groups and organizations, PSEG entered into the CEBA on February 25, 2016 with the City and a broad coalition of community groups and the neighboring UB along with the Connecticut Coalition of Environmental and Economic Justice ("CCEJ").<sup>18</sup> A copy of the executed CEBA is attached as

---

<sup>18</sup> The community groups and organizations that signed the CEBA include: UB, Black Rock NRZ, South End Neighborhood Revitalization Zone Committee and the West Side/West End Neighborhood Revitalization Zone Implementation Committee (collectively referred to herein as the "Community Groups"). Additional community groups and organizations may sign separately by executing the joinder agreement mechanism in the CEBA.

Exhibit G-1.<sup>19</sup> The CEBA contains substantial commitments and benefits PSEG is providing to the City and community. Among other things, PSEG agreed to: (i) contribute \$2 million to create a community environmental benefits fund for public health and environmental benefits for the community to be administered at the direction of the community’s environmental task force (“ETF”);<sup>20</sup> (ii) end commercial operations of BHS Unit 3 by July 1, 2021; (iii) initiate a program with the purpose of investing \$5 million in renewable energy investment projects located in Bridgeport that satisfy certain conditions; (iv) participate jointly with the City in a Site planning study to explore potential redevelopment or reuse of the portion of the BHS Site not occupied by the Project or other BHS facilities; and (v) work cooperatively with local building trades unions, the City, ETF, CCEJ and UB to identify and qualify subcontractors and laborers, including minorities, women and veterans, with a preference for Bridgeport residents and businesses. As a result of the cooperative communications and negotiations that resulted in the CEBA, the City and the Community Groups confirmed that they do not oppose the Project. Significantly, as the CEBA shows, the City agreed to express its support for the Project to the Council and CT DEEP.

In addition to the consultations and negotiations that took place pursuant to the EJ Act, PSEG also prepared and sent a technical report (the “Technical Report”) to the City. The Technical Report addressed the need, site selection process and potential environmental effects of the Project in the manner provided by C.G.S. § 16-50l(e) and was sent to the mayor and City on November 13, 2015. The Technical Report, attached as Exhibit H,<sup>21</sup> also included an earlier

---

<sup>19</sup> Attached as Exhibit G-2 is the press release issued by the City of Bridgeport on February 25, 2016 announcing the execution of the CEBA.

<sup>20</sup> On February 1, 2016, the City of Bridgeport’s City Council adopted an ordinance authorizing (i) the creation of the ETF and (ii) Mayor Joseph P. Ganim to execute the CEBA on behalf of the City of Bridgeport.

<sup>21</sup> A copy of the full Technical Report as submitted to the City on November 13, 2015 is being filed in bulk with the Council. Exhibit A to the Technical Report, the Land Use and Environmental Information Report prepared by AKRF, Inc., was updated recently (Revision 1) and is designated Exhibit A to this Petition.

version of Exhibit A to this Petition.<sup>22</sup> As of this Petition date, PSEG has not received any formal response from the City to the Technical Report.

## **II. DESCRIPTION OF THE PROJECT**

### **A. Site Description**

As indicated above, PSEG selected the Site for the proposed Facility based on the space available and infrastructure at the existing BHS, including convenient access to a natural gas supply, existing electric transmission system interconnection capabilities, and liquid fuel delivery facilities that offer ample supply resources for ULSD. The Site's geological and surficial characteristics also show that it is suitable for the proposed Facility.<sup>23</sup> Local industrial land use characteristics and waterfront access, with the potential for barge access for fuel and materials used during construction also support the Site selection, as the Facility will be located within an area zoned for industrial uses and surrounded by other industrial sites, including other electric generating resources.

The industrial nature of the Project is compatible with the zoning for the Site. The northern portion of the proposed Project Site is located within an Industrial-Heavy (I-H) Zone and the southern portion of the Site within an Industrial-Light (I-L) Zone. According to the City Zoning and Subdivision Regulations, the I-H Zone is intended to reserve appropriate areas of the City for those industries which, due to impacts of dust, traffic, hazards, appearance or intensity of industrial development, are not desirable in or adjacent to non-industrial areas. Development and performance standards are intended to recognize the operational needs of high impact

---

<sup>22</sup> Because the Technical Report was sent to the City after the election of current Mayor Ganim, before he was sworn into office, PSEG provided a copy of the Technical Report to both then-Mayor William Finch and then-Mayor elect Ganim.

<sup>23</sup> See Exhibit A, Appendix A for soil survey map of the Site.

industries while setting standards to promote safe, functional, efficient, and environmentally-sound development and operation. The I-L Zone is intended to promote industrial uses with minimal off-site impacts. Such zones are intended to be in areas where most industrial uses may be located, but where development and performance standards, which are stricter than those in the I-H Zone, promote uses which are compatible with non-industrial areas. West of BHS is a Mixed Use Waterfront (MU-W) Zone, an Office Retail (OR) Zone, Mixed Use Educational/Medical (MU-EM) Zone, as well as residential zones (from single family to residential high density zones). North of the Site are a Downtown Village District Waterfront (DVD-WF) Zone and a Downtown Village District Transit-Oriented Development (DVD-TOD) Zone.

Any potential environmental impacts caused by the Facility will be compatible with existing zoning requirements and minimized by good engineering practice and site design, installation of state-of-the-art air quality control technology for air emissions, best management practices for reducing potential impacts on water resources and water quality, minimization of truck traffic through surrounding residential neighborhoods, mitigation measures for noise, and use of natural gas and ULSD fuel. Again, as indicated above, the potential for environmental impacts and effects on the surrounding community will be reduced by locating the Facility at the Site of existing electric generating infrastructure, thereby reducing potential construction emissions and impacts. The Facility will have only a minimal potential to cause any health-related impacts because it will be designed, permitted and operated to comply with ambient air quality and water quality standards promulgated to protect both human health and the environment.

Existing ambient background noise levels in the direct vicinity of the Site are typical for industrial areas with significant industrial activity, including a large amount of heavy truck activity throughout the day. Within the surrounding neighborhoods, ambient background noise levels are typical of urban areas. Noise sources identified in the areas include industrial activity, vehicle traffic along I-95 and local roadways, railroad operations from the Metro-North and Amtrak rail systems and marine activity, including the Bridgeport-Port Jefferson ferry terminal.

**B. Visual Impact Environmental Compatibility**

The design of the proposed Facility has been developed to meet the public need for electric generation capacity and energy supplies for the wholesale power markets while minimizing any potential adverse environmental impacts. PSEG selected the proposed location to minimize any potential visual impacts and designed the equipment layout to further reduce the potential environmental impacts. As an example of such design considerations, while the proposed stack height will be no taller than approximately 300 feet above the Site design grade, the Facility's new stack will be significantly lower than the existing 498-foot stack height of BHS Unit 3.

Primary Facility structures, including the proposed turbine building, HRSG building, and air-cooled condenser are anticipated to have heights of approximately 97, 125, and 125 feet above the proposed site design grade, respectively. The new exhaust stack will be the most prominently visible new structure.

A total of four exhaust stacks are currently located at the Site, the tallest of which is 498 feet above grade. Therefore, the proposed combined cycle Facility and related improvements will be located on a developed property that is already the location of existing generating units, including all visible appurtenances such as the existing exhaust stacks, boilers, coal conveying equipment, oil tanks, and barge docks.

In light of this existing industrial development, the proposed addition of the equipment required to support the combined cycle Facility, including the proposed 300-foot exhaust stack, will result in an incremental but not material change in the appearance of the BHS. The proposed 300-foot stack will be lower than the existing 498-foot stack at the Site, and the remaining Facility structures will be generally consistent with the height of the other structures at the BHS Site.

To illustrate this, viewshed photographs were taken from five vantage points, shown in Exhibit A, Figures 5-2 to 5-6. Exhibit A, Figure 5-1 depicts the vantage point locations. The existing view and photosimulation from Soundview Drive are shown in Exhibit A, Figure 5-2. The existing view and photosimulation from Broad Street and University Avenue are shown in Exhibit A, Figure 5-3. Exhibit A, Figure 5-4 shows the view and photosimulation from Newfield Avenue boat ramp. The view and simulation from the new ferry site are shown in Exhibit A, Figure 5-5. Exhibit A, Figure 5-6 shows the view and simulation from the corner of Soundview Drive and Cove Road.

As shown in the photosimulations, the new Project, where visible, will not be substantially different from the existing BHS, nor would it be in sharp contrast with the area surrounding the Site. Thus, the proposed Project will not significantly impair the visual landscape from any of the area resources of potential concern, nor will the Project interfere with or reduce the general public's or area residents' enjoyment and/or appreciation of any open space or other scenic resources. In addition, residents and visitors to the area will not experience a significant change in the visual character of the area. Overall, the new Project will be visible, but will not be out of character with or out of proportion to the views of the existing BHS or other energy infrastructure in the immediate area. Thus, there will be no significant adverse impacts as

a result of the Project. In response to the community's concerns raised during the EJ process about the existing Site's visual impacts, PSEG also agreed in the CEBA to collaborate with the City and jointly participate in a Site planning study of PSEG's redevelopment or reuse of the remainder of the BHS Facility.

**C. Air Emissions Impacts**

In a combined cycle facility, hot gases from the Combustion Turbine Generator ("CTG") are exhausted through ductwork to the HRSG, where heat energy is extracted and used to generate high pressure steam. The HRSG also contains a duct burner (natural gas-fired) which can be used to provide additional heat energy to the HRSG to increase steam production under certain operating conditions. Exhaust gas flow from the HRSG is discharged to the atmosphere through an approximately 300-foot tall stack. The CTG produces electricity directly and the exhaust heat from the CTG produces steam in the HRSG, which drives a steam turbine generator to produce additional electricity.

The proposed unit will be equipped with state-of-the-art air emissions control technology, including:

- Dry Low NO<sub>x</sub> combustors, a selective catalytic reduction system, and water injection when firing liquid fuel which all serve to reduce NO<sub>x</sub> emissions;
- An oxidation catalyst to reduce CO and VOC emissions; and
- An air-cooled condenser which avoids particulate emissions associated with evaporative (i.e. "wet") cooling systems.

An initial air quality impact study has been completed and was submitted to CT DEEP on April 7, 2015 (see Exhibit D). This study has been updated and was resubmitted to CT DEEP on February 17, 2016. The study uses the EPA-developed and preferred dispersion model, known as

AERMOD, to evaluate the ground-level impact of Unit 5 stack emissions. Various operating conditions are studied including different ambient temperatures (which affect CTG performance), various CTG loads, firing on both fuels (natural gas and ULSD), and both steady-state CTG operation and transient CTG operation.

Steady-state operation involves “normal” operation and is the usual state of the unit. Transient operating conditions involve start-up and shutdown activities. With the exception of NO<sub>2</sub>, the study concludes that the impacts from the Unit 5 emissions, as proposed and after inclusion of a representative monitored background concentration to account for emissions of other sources in the region, do not exceed the NAAQS, the State ambient standards or the PSD Class II increments. The impact study did predict potential SIL exceedances for NO<sub>2</sub>, meaning only that further analysis is required for NO<sub>2</sub> to establish that the short-term NO<sub>2</sub> NAAQS will not be exceeded. The required studies are underway and will be submitted to CT DEEP.

The Project’s potential air quality impacts are minimized both through its state-of-the-art design including the addition of highly efficient pollution control equipment, and through the use of the proposed fuels, pipeline quality natural gas and ULSD, which are the cleanest available fossil fuels in the market today. The Project will meet EPA and CT DEEP requirements to employ “Best Available Control Technology” (“BACT”) and/or Lowest Achievable Emission Rate (“LAER”) technology for the various pollutants. The application of BACT or LAER is determined on a pollutant-specific basis by the projected annual quantity of emissions and the attainment status of the Bridgeport area. BACT will be employed to control emissions of NO<sub>x</sub>, CO, PM, PM<sub>2.5</sub>, PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub> and Greenhouse Gases. LAER will be employed to control emissions of the ozone precursors NO<sub>x</sub> and VOC. The final LAER and BACT determinations are

made by CT DEEP during the formal technical review process as part of the air permitting package review.

Employed together, the selected fuels, state-of-the-art turbine design and air emission controls ensure that the Project combines high energy efficiency with very low emission rates.

**D. Other Potential Impacts**

PSEG engaged the services of technical consultants with substantial experience in planning and permitting power plant facilities, including AKRF, Inc. (“AKRF”). Attached as Exhibit A is the Land Use and Environmental Information Report prepared by AKRF, which reviews all of the potential environmental impacts and efforts by PSEG to mitigate such impacts.

1. Noise Impacts

Chapter 6 of Exhibit A describes the various noise sources proposed for the Facility. As discussed by AKRF in its report, the preliminary noise analysis confirms that the surrounding area is characterized by high background noise in part due to heavy industrial activities in the area, among other sources. The noise analysis predicts that with noise reduction measures that are included in the Project design the noise level from the proposed Facility will be in compliance with existing State and City noise standards.

2. Visual Impacts

AKRF conducted a visual impact analysis, as discussed in Exhibit A, Chapter 5 and depicted in Exhibit A, Figures 5-1 to 5-6. As described by AKRF, the proposed Facility will be visible, but the visual impacts are expected to be minor, especially given the current prominent visibility of the existing stacks and structures on the Site.

3. Traffic Impacts

AKRF considered the potential effect of the proposed Project on traffic during both construction and operation. Traffic impacts are expected to be limited to the construction time

frame for the Project. Temporary increases in traffic levels from construction vehicles may be experienced in the nearby neighborhoods. Where practicable, barges will be used to deliver materials and equipment to the Site, including large equipment and bulk deliveries of materials such as backfill and aggregates. These potential impacts will be temporary in nature. After construction is completed, the number of additional vehicle trips for delivery of supplies and worker commutes will be comparable to or less than those of the existing BHS Site.<sup>24</sup> During Project operations, AKRF anticipates that vehicle trips will not result in excessive traffic near the Site.

#### 4. Historic and Archaeological Resources

AKRF evaluated potential effects of the proposed combined cycle Project on historic and archaeological resources. The proposed generating equipment will be installed on approximately 16 acres of previously disturbed land at the existing BHS. The new combined cycle Project will be sited in an area where four above-ground fuel oil storage tanks are currently located. These existing oil storage tanks, installed in 1968, will be removed in advance of the proposed Project pursuant to the Unit 3 Tank Project described above. As the Project development will occur within a previously disturbed industrial site, environmental impacts to historical or archaeological resources are minimized as compared with the development of a similar project on a “greenfield” site. As indicated in Exhibit A, Appendix A, the State Historic Preservation Office determined on February 5, 2015 that no historic properties will be affected by this Project and no further review is requested.

#### 5. Natural Resources

---

<sup>24</sup> Since PSEG has committed to closing BHS Unit 3 by July 1, 2021, worker commutes to the Site are expected to eventually decline especially as Unit 3 operations are discontinued.

The analyses conducted by AKRF on various geological, ecological and biological resources in the area confirmed that the Site and surrounding vicinity is characterized by important natural resources, including Long Island Sound, but that the Project, especially as designed, is not expected to have adverse environmental impacts on these resources. See Exhibit A for details. During construction, appropriate soil erosion and sediment control measures (e.g., silt fence, turbidity curtains, etc.) will be installed to prevent loose sediment from entering the on-site wetland area.

#### 6. Water Resources

The Project engineers have designed the proposed Facility to have a minimal impact on water resources, including potable water and the wastewater process. The water use analysis (water balance), shows the Facility's water inputs and outputs and indicates minimal water outputs, with discharges to be limited to the existing City sanitary sewer system. In addition, engineers have prepared Site plans that feature a grading and drainage plan designed to manage and reduce stormwater runoff.

### **III. STAKEHOLDER CONSULTATIONS**

PSEG has contacted many State and local officials and other stakeholders to seek input as part of its efforts to improve BHS and implement new needed generation in Connecticut.

Specifically, PSEG has discussed the Project with:

- City of Bridgeport Council staff;
- CT DEEP staff;
- Mayor Ganim on behalf of the City and his predecessor, Bill Finch;
- Other City officials, including David Kooris, Director of Planning and Economic Development, who led the City's direct negotiations of the CEBA;

- Members of the Citizens Advisory Committee, who were appointed by Mr. Finch to participate in negotiations with PSEG on behalf of the City in the CEBA negotiations, including Adrienne Houel, chair, George Estrada of UB, vice chair, Rev. Carl McCluster, and Sharon Lewis on behalf of CCEJ;
- Members of the City's various neighborhood revitalization zones;
- CCEJ;
- UB;
- Connecticut Fund for the Environment;
- Sierra Club;
- Environment Connecticut;
- Conservation Law Foundation; and
- Healthy Connecticut Alliance.

The conversations with these stakeholders were productive and led in many cases to constructive improvements to the Project and PSEG's overall plans for BHS. As in any contract negotiation, the CEBA represents mutual compromise and cooperation. Several of the groups that participated in the negotiations opted not to sign the CEBA, while the signatories pledged specific cooperation in exchange for the concessions achieved by the CEBA. Generally, issues that were frequently raised by the stakeholders included: (1) the environmental compatibility of the Project, most notably focused on requesting that Unit 3 be shut down as soon as practicable; (2) the economic impact of the Project, including foreseeable construction jobs and permanent staffing levels (especially with the goal that Bridgeport's own minority and women-owned businesses and laborers share in the economic opportunities to the extent possible); and (3) the tax impact on the property tax roll in the City.

During the subsequent consultations with the City and the community groups, PSEG concluded negotiations successfully and entered into the CEBA with the City, CCEJ, and UB.<sup>25</sup> Furthermore, PSEG is encouraged by the productive negotiations with other community groups, some of which may decide to sign the CEBA shortly and in any event appreciated PSEG's commitment to shut down Unit 3, as well as other community benefits provided by the CEBA.<sup>26</sup> The significant benefits PSEG agreed to provide to the City and community groups, including the \$2 million environmental benefits fund, commitment to close Unit 3, and willingness to invest \$5 million in suitable renewable energy projects in Bridgeport, all provide solid support for the City's and community's decision to support the Project. When the environmental benefits of the CEBA are taken into consideration with economic benefits of the Project – including the tax benefits and construction jobs in Bridgeport – the Project provides meaningful public benefits without any substantial adverse environmental effects.

PSEG intends to continue the community outreach and public dialogue with State and City officials and other interested stakeholders as it continues to seek the applicable governmental permits and approvals and as the Project construction schedule is implemented.<sup>27</sup> PSEG is pleased with the level of cooperation with the community and looks forward to continuing its role as a good neighbor and participant in the City's business and community affairs.

#### **IV. ENVIRONMENTAL JUSTICE ACT COMPLIANCE**

---

<sup>25</sup> See Section IV below for the discussions held in respect of the EJ Act Compliance.

<sup>26</sup> As indicated above, while some community groups that engaged in active negotiations in support of the CEBA have not yet signed, they may eventually do so pursuant to the Joinder Agreement mechanism attached to the CEBA.

<sup>27</sup> See [Exhibit K](#) for a copy of the construction schedule.

Since the Project requires the Council's approval and environmental permits from the CT DEEP, the EJ Act requires that environmental justice requirements be met. PSEG has complied fully with both the spirit and letter of this law, including the Council's and CT DEEP's implementation thereof.

Specifically, prior to sending its Technical Report to the City, as part of the municipal consultation phase, PSEG submitted an Environmental Justice Public Participation Plan ("EJ Plan") to the CT DEEP. On August 15, 2014, the CT DEEP approved the EJ Plan.<sup>28</sup> As prescribed in the EJ Plan, PSEG conducted extensive community outreach that included the mailings of hundreds of letters, posting signs in English and Spanish at the entrance to BHS, advertising in the local newspaper and Spanish language newspaper, media outreach, outreach to environmental groups, and outreach to City, State and federal public officials and community leaders in the area. On October 10, 2014, PSEG invited all abutters and sent invitations to every mailing address within a one-quarter mile radius of the BHS property (including addresses on the opposite side of Bridgeport Harbor in the East Side and East End neighborhoods) to attend an informal public meeting. PSEG conducted the informal public meeting in the community on October 27, 2014 and responded to many questions and comments. CT DEEP staff attended the informal public meeting as well. PSEG also developed a website with Project information and used the website to post materials, including its presentation from the informal public meeting, along with responses to frequently asked questions.<sup>29</sup> In addition, PSEG's project website contained the telephone number for an informational BHS Combined Cycle Project Hotline, 1-800-334-1814, set up to respond to community concerns and questions about the Project.

---

<sup>28</sup> See Exhibit I.

<sup>29</sup> See <https://www.pseg.com/family/power/fossil/stations/connecticut/bridgeport-harbor-cc-project.jsp> for the Project web-site.

Following execution of the CT DEEP approved EJ Plan, PSEG prepared an EJ Plan Final Report dated August 11, 2015, which was submitted to CT DEEP and is attached for the Council as Exhibit J.<sup>30</sup>

As discussed above, PSEG has continued its consultations with City officials and community groups and has completed an acceptable CEBA as provided for in the EJ Act.

## **V. COMPLIANCE WITH C.G.S. § 16-50ii**

The Facility will be constructed in full compliance with all applicable laws, codes and standards, including those required by C.G.S. § 16-50ii, which prohibits the use of flammable gas to clean or blow the gas piping of an electric generating facility. PSEG will retain the services of a special inspector to assist the City's fire marshal in reviewing construction plans and conducting inspections of the electric generating facilities to ensure compliance with the standards. In addition, PSEG is prepared to pay the requisite fee as required by C.G.S. § 16-50ii(b)(2) and C.G.S. § 29-251c(d) to be used in the training of local fire marshals on the complex issues of electric generating facility construction, which fee will be paid to the City's Building Department as part of the local building permit fee.

## **VI. CONCLUSION**

PSEG respectfully submits that its Project, as demonstrated in the foregoing and the attached exhibits, qualifies for Council approval by Declaratory Ruling as allowed under C.G.S. § 16-50k(a). PSEG therefore requests that the Council process this Petition expeditiously. The Project, as described herein, is in the best interest of Connecticut's electric consumers, satisfies

---

<sup>30</sup> Exhibit J also includes documentation of public notices published in English and Spanish language newspapers in the community along with lists of recipients of the abutter notices and notices to the residential community near the Project.

an important need for expanded generation in Southwest Connecticut and will have no substantial adverse environmental effect.

PETITION NO. \_\_\_\_\_

Pursuant to RCSA § 16-50j-39, the names, addresses, telephone numbers and e-mail addresses of the persons to whom correspondence or communications should be sent in regard to this Petition are as follows:

Stephen J. Humes, Esq. Holland & Knight LLP 31 West 52nd Street New York, NY 10019 Tel: (212) 513-3473 Fax: (212) 385-9010 <a href="mailto:steve.humes@hklaw.com">steve.humes@hklaw.com</a>	Leilani M. Holgado, Esq. Assistant General Environmental Counsel PSEG Services Corporation 80 Park Plaza, T5C Newark, NJ 07102 Tel: (973) 430-5521 Fax: (973) 802-1267 Leilani.holgado@pseg.com
Kathryn Gerlach Director Generation Development PSEG Energy Resources & Trade LLC 80 Park Plaza Newark, NJ 07102 Tel: (973) 430-8996 kathryn.gerlach@pseg.com	Robert Silvestri Environmental Compliance & Projects Mgr PSEG Power Connecticut 1 Atlantic Street Bridgeport, CT 06604 Tel: 203-551-6032 Fax: 203-551-6053 Robert.Silvestri@pseg.com

Respectfully submitted,

PSEG POWER CONNECTICUT LLC



By: \_\_\_\_\_

Stephen J. Humes, Esq.  
Holland & Knight, LLP  
31 W 52<sup>nd</sup> Street  
New York, NY 10019  
Tel: 212-513-3473  
Fax: 212-385-9010  
Email: [steve.humes@hklaw.com](mailto:steve.humes@hklaw.com)

Its attorneys

PSEG POWER CONNECTICUT LLC



By: \_\_\_\_\_

Leilani M. Holgado, Esq.  
Assistant General Environmental Counsel  
PSEG Services Corporation  
80 Park Plaza, T5C  
Newark, NJ 07102  
Tel: 973-430-5521  
Fax: 973-802-1267