

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

PETITION OF BRIDGEPORT ENERGY : PETITION NO. 841
II, LLC FOR A DECLARATORY RULING :
TO APPROVE THE INSTALLATION :
AND OPERATION OF A 350 MW :
PEAKING FACILITY AT THE EXISTING :
BRIDGEPORT ENERGY FACILITY IN :
BRIDGEPORT, CONNECTICUT : APRIL 3, 2008

PETITIONER'S PROPOSED FINDINGS OF FACT

In accordance with the schedule announced at the public hearing on March 4, 2008, Petitioner Bridgeport Energy II, LLC hereby submits its proposed Findings of Fact.

Introduction

1. On December 14, 2007, Bridgeport Energy II, LLC ("BEII" or "Petitioner"), pursuant to Connecticut General Statutes ("C.G.S.") § 16-50k, as amended by Section 18 of Public Act 05-01, and Sections 16-50j-38 to 16-50j-40 of the Regulations of Connecticut State Agencies ("R.C.S.A.") submitted a petition to the Connecticut Siting Council (the "Council") for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required for the construction, maintenance, and operation of a 350 megawatt ("MW") peaking facility at the existing Bridgeport Energy facility in Bridgeport, Connecticut (the "Petition"). (BEII Exhibit 1, p. 1; Transcript 1, p. 4).
2. BEII is a wholly-owned subsidiary of DLS Power Holdings, LLC, which is a joint venture of LS Power Associates, L.P. and its affiliates ("LS Power") and Dynegy, Inc. ("Dynegy"). (BEII Exhibit 1, p. 2).
3. The parties in this proceeding are BEII, 60 Main Street et al. ("60 Main Street"), and Michael Mauzerall and M&M Fence & Wire Works ("Mauzerall"). United Illuminating is an intervenor ("UI"). (Transcript 1, pp. 5-6).
4. 60 Main Street owns approximately 12 acres of abutting or nearby property, including parcels numbered 37, 51, 57 and 97 Henry Street and 12, 50, 60, 76, 110 and 122 Main Street, Bridgeport, Connecticut. (60 Main Street Exhibit 1 Pre-filed Testimony of Stephen Grathwohl at p. 1).

5. Mauzerall is an abutter of the proposed site, owning 21 and 27 Henry Street, Bridgeport, Connecticut. (BEII Exhibit 2, Response to Council Interrogatory No. 2; Transcript 2, pp. 77).
6. The proposed generating facility, to be built on the southern portion of the existing Bridgeport Energy property at 10 Atlantic Street in Bridgeport, Connecticut, would be located at a site where an electric generating facility operated prior to July 1, 2004. (BEII Exhibit 1, p. 1).
7. The proposed site is zoned heavy industrial in a historically industrial zone. To the north of the site is the Bridgeport Energy facility and directly to the east is the Bridgeport Harbor Station, a nominal 657 MW multi-unit, multi-fuel steam plant owned and operated by Public Service Electric & Gas ("PSE&G"). The west side of the site includes an undeveloped parcel owned by PSE&G and land owned by UI that is the site of the new Singer Substation. Directly south of the site is an abandoned manufacturing complex once owned by Remington Products, Inc. ("Remington Shaver Site") and now is owned by 60 Main Street et al. The Remington Shaver Site was rezoned to "Mixed Use Waterfront" on September 24, 2007. (BEII Exhibit 1, pp. 3-4; 60 Main Street Exhibit 1 Pre-filed Testimony of Stephen Grathwohl at p. 1).
8. 60 Main Street intends to develop its property with a high rise, residential condominiums, commercial uses, and a proposed marina. (60 Main Street Exhibit 1 Pre-filed Testimony of Stephen Grathwohl at p. 2).
9. The September 24, 2007 change in zoning is presently the subject of two appeals before the Connecticut Superior Court. Mauzerall is one of the appealing parties. (BEII Exhibit 1, p. 4; Transcript 1, p. 56; Transcript 2, pp. 59-60; 88).
10. Notice of the Petition and public hearing was provided to all abutting property owners by First Class U.S. Mail. (BEII Exhibit 2 Response to Council Interrogatory No. 1).
11. On February 19, 2008 BEII posted a sign at the site located at 10 Atlantic Street, Bridgeport, Connecticut, stating the name of the Petitioner and the date, time, and location for the Council's public hearing on the Petition. BEII posted a second sign at United Illuminating's Singer Substation on February 22, 2008, providing the same notice of the Council's public hearing. (BEII Exhibit 3 Pre-filed Testimony of D. Blake Wheatley at pp. 7-8; BEII Exhibit 14).
12. Pursuant to R.C.S.A. §§ 16-50j-21 and 16-50j-40, the Council, after giving due notice thereof, held a public hearing on March 4, 2008, beginning at 3:00 p.m. and continuing at 7:00 p.m. at the Bridgeport City Hall, Council

Chambers, 45 Lyon Terrace, Bridgeport, Connecticut. (Council Hearing Notice; Transcript 1; Transcript 2).

13. The Council and its staff inspected the proposed site on March 4, 2008 at 2:00 p.m. On the same day from 8:00 a.m. to approximately 2:00 p.m. the Petitioner raised a red balloon to a height of 213 feet to simulate the location and height of the proposed southern exhaust stack, which is the stack located in closest proximity to property owned by 60 Main Street and Mauzerall. The balloon was reeled in at approximately 2:00 p.m. for safety reasons due to heavy rain and weather conditions. (Council Field Review Notice; Transcript 1, pp. 20-21; 27-28; Transcript 2, pp. 93-94).

State Agency Comments

14. Pursuant to C.G.S. § 16-50j(h), the Council solicited the following state agencies for written comments regarding the proposed facility: the Department of Environmental Protection (“DEP”), Department of Public Health (“DPH”), Council on Environmental Quality (“CEQ”), Department of Public Utility Control (“DPUC”), Office of Policy and Management (“OPM”), Department of Economic and Community Development (“DECD”) and the Department of Transportation (“DOT”). (Council Record).
15. State agency comments were received from the DEP on February 26, 2008. (Council Record, State Agency Comments, Department of Environmental Protection).
16. The following agencies did not respond with comments on the Petition: DPH, CEQ, DPUC, OPM, DECD and DOT. (Council Record).

State, Municipal, and Community Consultation

17. BEII held multiple meetings with representatives of the State of Connecticut, including a meeting with the DEP on September 19, 2006 and with several DPUC commissioners on August 22, 2007. (BEII Exhibit 1, pp. 16-17 and Appendix J; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, pp.5-6).
18. BEII met with City of Bridgeport representatives, including the City’s Department of Zoning and Design Review Committee, on numerous occasions beginning in November 2006 and throughout 2007 and in early 2008 to introduce the project and solicit input and comments. (BEII Exhibit 1, pp. 16-17 and Appendix J; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, pp.5-6; Transcript 1, p. 57).
19. BEII held a public meeting with the South End Neighborhood Revitalization Zone on September 18, 2007 to introduce the project to members of the local

community. The South End Neighborhood Revitalization Zone wrote a letter to Bridgeport Planning & Zoning in support of the project. (BEII Exhibit 1, pp. 16-17 and Appendix J; BEII Exhibit 10; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, pp.5-6).

20. BEII began preliminary discussions with 60 Main Street in late 2006 and met with representatives of 60 Main Street on September 19, 2007 to exchange information about respective projects. BEII has made offers to discuss architectural details of the proposed peaking plant with 60 Main Street's architects. (BEII Exhibit 1, pp. 16-17; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, pp.5-6; Transcript 1, p. 57; 67; 102; Transcript 2, p. 58).
21. The City's Planning & Zoning Commission approved the project's Coastal Area Management permit on January 28, 2008. The City's Office of Planning & Economic Development wrote a letter of support for the approval of the project's Coastal Area Management permit. (Transcript 1, pp. 80-83; Council Record, Town Comments; BEII Exhibit 20).
22. BEII provided the Bridgeport Port Authority with information about its project in November 2007. The Bridgeport Port Authority wrote a letter of support for the project. (BEII Exhibit 1, pp. 16-17 and Appendix J; BEII Exhibit 18).
23. At the Council's public hearing on March 4, 2008, Mayor Bill Finch of the City of Bridgeport read a statement into the record in support of the project. (Transcript 1, pp. 80-83; Council Record, Town Comments).

Site Description

24. The site is an approximate 2.16 acre parcel of land on the southern portion of the existing Bridgeport Energy facility at 10 Atlantic Street in Bridgeport, Connecticut, located southeast of the intersection of Russell and Atlantic Streets in the Heavy Industrial (I-HI) zone. (BEII Exhibit 1, pp. 4-5 and Appendix G).
25. The site currently houses the Bridgeport Energy gas metering facilities and two aqueous ammonia tanks. (BEII Exhibit 1, pp. 4-5).
26. The site is within 1,000 feet of the high tide line in Bridgeport Harbor, but is on a parcel of land physically isolated from the shore and part of a larger area that has been dedicated to generation of electricity for decades. There is no evidence of any coastal resources on or adjacent to the site. (BEII Exhibit 6, pp. 3-4; BEII Exhibit 1, pp. 13-14 and Appendix G).
27. The site contains no wetlands or watercourses on site or immediately adjacent to the site. (BEII, Exhibit 1, Appendix G, p. 2-8; Transcript 1, pp. 32-33).

28. The site contains some evergreens around the perimeter of the site, which will require removal for construction of the Project. The trees will be replaced, along with additional landscaping enhancements, pursuant to the updated landscaping plan and in accordance with the City's Planning & Zoning Commission approved the project's Coastal Area Management permit on January 28, 2008. (Transcript 1, pp. 33-34; BE II Exhibit 9; BEII Exhibit 11).
29. The site is located less than a mile southeast from I-95. (BEII Exhibit 1, Appendix 1).

Power Plant Description

30. The BEII project is a nominal 350 MW, two-unit, gas-fired combustion turbine facility intended to serve peak loads in the State of Connecticut. (BEII Exhibit 1, p. 5).
31. The Project will utilize two frame-class combustion turbines, either General Electric's 7FA/7FB or Siemens' SGT6-5000F. (BEII Exhibit 1, p. 5).
32. The primary fuel for the project is natural gas. The project will use ultra low sulfur fuel oil (15 ppm sulfur) as back up fuel for only a limited period of time equivalent to up to 500 hours per year, per unit, when operating at the plant's maximum firing rate. (BEII Exhibit 1, p. 5; BEII Exhibit 5 Prefiled Testimony of Richard Londergan, p.3).

Transmission Interconnection

33. The electricity generated by the project will be stepped up to 345kV by two onsite generator step-up transformers. The high voltage output will be transmitted to the United Illuminating 345 kV Singer Substation located approximately one block west of the site, via an underground transmission line. (BEII Exhibit 1, p.6).
34. BEII has filed Interconnection Study requests with ISO-New England, Inc. ("ISO-NE") to determine whether the peaking station project can be interconnected without transmission upgrades. With respect to BEII's first application for up to 325 MW of summer capacity and up to 375 MW of winter capacity, ISO-NE determined the peaking station project can be interconnected without transmission upgrades. BEII's second application requested a study to determine if incremental capacities associated with Siemens' turbines would require an upgrade. BEII expects the results of the studies to be completed in the spring of 2008 and expects that no upgrades will be required. (BEII Exhibit 1, pp.6-7; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, p.4; Transcript 2, pp. 21-22).

35. United Illuminating's Singer Substation is approximately 250 feet from the site of the proposed peaking facility. (Transcript 1, p. 82).
36. The City of Bridgeport expressed to BEII its preference that a public utility rather than a private company construct, own, and operate the underground transmission line tap between Singer Substation and proposed peaking station. (Transcript 2, pp. 18-19).
37. BEII and United Illuminating are currently engaging in discussions, but do not have a definitive agreement, regarding BEII's proposal that that United Illuminating will construct, own, and operate the underground interconnecting transmission line tap between the Singer Substation and proposed peaking station, and obtain the necessary approvals for the same. (BEII Exhibit 1, pp. 6-7; BEII Exhibit 3 Prefiled testimony of D. Blake Wheatley, p. 5; Transcript 1, pp. 11-12; Transcript 2 pp. 18-19).
38. The underground transmission line tap, the primary function of which will be to interconnect a private power producing facility to the electrical grid serving the state, will be the subject of a separate petition to the Council once final arrangements for construction and ownership are determined. (Transcript 1 pp. 11-12).

Fuel Supply and Storage

39. The natural gas will be supplied through an existing Southern Connecticut Gas Company lateral that supplies natural gas to the existing Bridgeport Energy facility. (BEII Exhibit 1, pp. 5-6; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, p.3).
40. The Bridgeport Energy facility is currently the only user of the Southern Connecticut Gas Company lateral, although it was built to accommodate additional flow. BEII is working with Southern Connecticut Gas Company to determine what, if any, steps are necessary to ensure adequate gas pressure to accommodate the needs of the project and the existing Bridgeport Energy facility. (BE II Exhibit 1, pp. 4-5; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, p.3).
41. An additional compressor station may be built along the gas line within one mile of the site. (BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, p. 3; Transcript 1, pp. 42-44).
42. An approximately 42 foot tall fuel oil storage tank with a capacity of approximately 800,000 gallons will be installed to store ultra low sulfur fuel oil, which will be a sufficient amount to allow the project to operate on fuel oil for up to 24 hours. (BEII Exhibit 1, p. 5; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, p. 4; BEII Exhibit 7 Prefiled Testimony of

Andrew Degon, p. 3; BEII Exhibit 2 Response to Council Interrogatory No. 5; Transcript 1, p. 40; 87).

43. In the event that natural gas is unavailable and fuel oil is used, BEII has identified the most direct route which minimizes routing trucks through residential areas. When fuel oil is used, it is estimated that two 8,000 gallon fuel trucks per hour will be necessary to refill the oil tank. (BEII Exhibit 16; BEII Exhibit 19 Responses to 60 Main Street Interrogatories, Interrogatories 8-10; Transcript 1, pp. 84-88; 91-93).
44. BEII's truck traffic projections indicate an insignificant affect on traffic. (BEII Exhibit 19 Responses to 60 Main Street's Interrogatories, attachment; Transcript 1, pp. 91-93).

Water Requirements

45. When firing natural gas, the BEII Project will require approximately 29,000 gallons/day of municipally supplied potable water under typical operating conditions (12 hours of operation during a summer day) primarily for the evaporative coolers. During the limited times of oil firing, the BEII Project will also require municipally supplied potable water to make demineralized quality water, which is injected into the combustor of the combustion turbine to help reduce NOx emissions. In the highly unlikely and infrequent scenario where fuel oil is burned continuously over a 24 hour period, up to 885,000 gallons/day of water could be required. (BEII Exhibit 1, pp. 7, 14; Transcript 1, pp. 44-46).
46. Make-up water for the Project will be supplied from an existing eight inch municipal potable water line. (BEII, Exhibit 1, p. 7).
47. Process wastewater from the Facility, comprised of mainly evaporative cooler blowdown, will be directed to the Bridgeport sewer system. When evaporative coolers are in service, process wastewater should not exceed 22,000 gallons/day based on typical operating conditions (12 hours of operation during a summer day). This discharge is expected to be covered by a DEP general permit. (BEII Exhibit 1, p. 14).

Environmental Considerations

Air Emissions

48. On January 30, 2007 and June 8, 2007, BEII submitted a New Source Review Air Permit application and revised application, respectively, to DEP for a permit to construct and operate the Project and demonstrating compliance with Best Available Control Technology ("BACT") and Lowest Achievable

Emission Rates (“LAER”) control technology requirements (BEII Exhibit 1, pp. 12-13 and Appendix F New Source Review Air Permit Application).

49. BEII filed the June 2007 New Source Review Air Permit as a bulk exhibit for Council review, which included a full air quality compliance analysis and analysis of alternatives, including control technology. (BEII Exhibit 1, Appendix F).
50. The Project will utilize low-NO_x combustion technology and selective catalytic reduction (“SCR”) for the reduction of NO_x emissions. (BEII Exhibit 1, p. 6; BEII Exhibit 5 Prefiled Testimony of Richard Londergan, p. 3).
51. The Project will have an air permit which will restrict operations of each combustion turbine to 2500 hours annually, including up to the equivalent of 500 hours burning fuel oil at the maximum firing rate. (BEII Exhibit 1, p. 6; BEII Exhibit 5 Prefiled Testimony of Richard Londergan, p. 3).
52. The application of operational controls and pollution controls will limit emissions of all pollutants below the Prevention of Significant Deterioration (“PSD”) major source thresholds with the exception of CO and NO_x. The Project, therefore, is considered a major stationary source of air pollutants due to its emissions of CO and NO_x. (BEII Exhibit 1, pp. 12-13).
53. The Project is subject to the New Source Review (“NSR”) requirements of the Clean Air Act including the PSD program and the non-attainment NSR programs (“NNSR”). (BEII Exhibit 1, pp. 12-13).
54. On July 27, 2007, BEII filed its Acid Rain Permit application to DEP. (BEII Exhibit 1, p. 13).
55. The proposed Project will comply with all applicable air quality standards and requirements. (BEII Exhibit 5 Prefiled Testimony of Richard Londergan, pp. 3-4).
56. Air quality impacts from the facility will be *de minimus*, i.e., below the significant impact levels set by the State of Connecticut, based on DEP required air quality dispersion modeling. (BEII Exhibit 5 Prefiled Testimony of Richard Londergan, pp. 3-4).
57. The Project will also include an approximately 800,000 gallon backup fuel oil tank that will have minor VOC emissions. (BEII Exhibit 1, p. 13; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, p. 4).

Coastal Resources

58. There is no evidence of any coastal resources on or adjacent to the site, which is located within 1,000 feet of the high tide line in Bridgeport Harbor, but is on a parcel of land physically isolated from the shore and part of a larger area that has been dedicated to generation of electricity for decades. (BEII Exhibit 6, pp. 3-4; BEII Exhibit 1, pp. 13-14 and Appendix G).
59. The City's Planning & Zoning Commission approved the project's Coastal Area Management permit on January 28, 2008, determining that as conditioned the Project will have no unacceptable adverse impacts on the Coastal Area. (BEII Exhibit 9).

Wetlands

60. There are no wetlands or watercourses on site or immediately adjacent to the site. (BEII, Exhibit 1, Appendix G, p. 2-8; Transcript 1, pp. 32-33).

Air Navigation

61. The FAA has issued Determinations of No Hazard to Air Navigation for the exhaust stacks of 213 feet and a crane of approximately 263 feet in height for the construction. (BE II Exhibit 1, p. 15 and Appendix H).

Sound

62. The Project is located in an industrial zone and is currently surrounded by industrial properties. The nearest residential receptors are presently located approximately 400 feet of the site, and west of the Singer Substation. Property located south of the site, formerly known as the Remington Shaver Site and now owned by 60 Main Street, has recently been rezoned to "Mixed Use Waterfront" to support a mixed residential and commercial development and could, therefore, become the nearest residential receptor in the future. (BEII, Exhibit 1, p. 15).
63. BEII has identified the most stringent noise standard to be the nighttime residential noise level of 51 dBA from an industrial emitter's zone. (Transcript 1, pp. 31).
64. The applicable noise regulations permit an increase of 5 dBA over the 51 dBA standard in areas that are deemed to be in high noise areas. (Transcript 1, pp. 31-32).
65. Results from ambient noise measurements taken at the site in December 2007 indicate that the Project is located in a high noise area. (Transcript 1, pp. 99-100).
66. BEII's noise mitigation design includes housing the turbines in an acoustically treated building and installing silencers on the inlet to the combustion turbines

and within the exhaust stacks to further mitigate noise emissions to comply with applicable noise regulations. (BEII, Exhibit 1, p. 15).

Visibility

67. The primary components of the proposed facility include the turbine building (80 feet tall), the fuel oil storage tank (42 feet tall) and the exhaust stacks (213 feet tall). Tall buildings, tree cover and other structures will serve to screen the Bridgeport Peaking Facility from much of the surrounding community. (BEII Exhibit 2 Response to Council Interrogatory No. 6; see also Transcript 1 pp. 59-61).
68. BEII's viewshed analysis indicates that the stacks may be visible from a long distance in many areas of the view shed; however, an observer may only see a small portion of the top of the stack in those areas. (BEII Exhibit 2 Response to Council Interrogatory No. 6; BEII Exhibit 13; see also BEII Exhibit 1, Appendix E; Transcript 1 pp. 59-61).
69. The proposed 213 foot stacks are less than half the height of the red and white Bridgeport Harbor Station stack (498 feet) located at the adjacent power plant. (BEII Exhibit 2 Response to Council Interrogatory No. 6; see also Transcript 1 pp. 59-61).
70. 60 Main Street is the only party to the proceedings raising architectural or visual concerns about the proposed Project, but has expressed that it does not object to a project that is in keeping with the surrounding area. 60 Main Street concedes that it was aware of the existing Bridgeport Harbor plant and Bridgeport Energy facility adjacent to its property at the time it purchased the property and designed its proposed project. (60 Main Street Exhibit 1, Prefiled Testimony of Stephen Grathwohl, p. 2; Transcript 2, p. 64).
71. In response to visual concerns, BEII moved the proposed building and exhaust stacks approximately 20 feet to the north and east in order to increase the distance of most equipment from the proposed 60 Main Street development. The combustion turbine generators and ancillary equipment are completely housed in an enclosed building. Additional landscaping has been proposed along the south side of the site as a result. Enhanced landscaping plans have been developed, pursuant to the updated landscaping plan and in accordance with the City's Planning & Zoning Commission approved the project's Coastal Area Management permit on January 28, 2008. (Transcript 1, pp. 33-34; 66-67; BE II Exhibit 9; BEII Exhibit 11; BEII Exhibit 3 Prefiled Testimony of D. Blake Wheatley, p. 7; BEII Exhibit 19 Responses to 60 Main Street's Interrogatories, Interrogatory 1).
72. BEII considered, but rejected, a green roof design as impractical for the proposed Project because the building roof must be capable of disassembly to

allow access to the generating equipment within. BEII also considered, but rejected, a green roof design as inappropriate for the top of the oil storage tank due to required access. (BEII Exhibit 19 Responses to 60 Main Street's Interrogatories, Interrogatory 4; Transcript 2, p. 56).

73. A wall along the site along Russell Street cannot be constructed for engineering reasons as the wall would block the inlet air intakes of the Project, which cannot be relocated. (Transcript 1, pp. 96-97).

Storm Water Runoff

74. Mauzerall expressed concerns related to flooding of his property and Henry Street during storm surge events and expressed concern that both the proposed Project and the 60 Main Street development projects could pose water drainage problems. Mauzerall presented two photographs taken about ten years ago as evidence of flooding experiences after a storm surge. (Transcript 2, pp. 79-80; 87-88; Mauzerall Exhibits 1 & 2).
75. Stormwater from the facility will be retained onsite to the greatest extent practicable and infiltrated to the ground with the use of dry wells and underground stormwater detention and recharge systems. (BEII Exhibit 1, p. 16).
76. BEII's original drainage design is consistent with the Bridgeport Water Pollution Control Authority recommendations. (BEII Exhibit 1, p. 16).
77. BEII's revised grading and drainage plans, which were revised to accommodate increased landscaping along the western and southern edge of the property and to reduce the oil storage tank size, will be resubmitted to Bridgeport Water Pollution Control Authority for additional review. (BE II Exhibit 7 Prefiled Testimony of Andrew Degon, p. 3).
78. All structures on the site will be located at least one foot above the identified floodplain elevation in accordance with Federal flood management regulations, as incorporated into local building and zoning codes. (Transcript 1, p. 23; Council Record, State Agency Comments, Department of Environmental Protection).

Wildlife Impacts

79. DEP's Natural Diversity Database maps and files do not indicate the presence of state or federally recognized plant or animal species that are listed as endangered, threatened or species of special concern. (BEII Exhibit 8; see also Council Record, State Agency Comments, Department of Environmental Protection).

Respectfully Submitted,

BRIDGEPORT ENERGY II, LLC

By

A handwritten signature in black ink, appearing to read 'Mark R. Sussman', written over a horizontal line.

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CERTIFICATE OF SERVICE

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