STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

PETITION OF BRIDGEPORT ENERGY 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	:	PETITION NO. 841
	:	FEBRUARY 26, 2008

PETITIONER'S LIST OF WITNESSES AND EXHIBITS

I. WITNESSES

Bridgeport Energy II, LLC ("Bridgeport Energy II") expects the following witnesses to be available to testify at the Connecticut Siting Council's (the "Council") public hearing on March 4, 2008:

A. Mr. D. Blake Wheatley, General Manager, LS Power Development, LLC. Mr. Wheatley is the General Manager of LS Power Development, LLC, which is joint owner of Bridgeport Energy II, LLC, along with Dynegy, Inc. Mr. Wheatley supervised the preparation of the petition and coordinated local outreach efforts. Mr. Wheatley will provide testimony regarding an overview of the proposed peaking facility, including aesthetics, how the peaking facility will be electrically interconnected, the facility's expected dispatch scenario, fuel supply, and consultations with Bridgeport and the community, including presentations to the planning and zoning commission.

B. Mr. Thomas W. Kaslow, Principal Consultant, Sigma Consultants, Inc. Mr. Kaslow's area of expertise is the New England wholesale electric markets. Mr. Kaslow will testify as to the public need for the project, including projections of need in the Installed Capacity Market, and the Locational Forward Reserve Market.

C. Mr. Richard Londergan, Ph.D., Senior Program Director, EarthTech, Inc. Mr. Londergan is a recognized expert in the field of air pollution control. Mr. Londergan prepared the analysis of the emissions from the proposed peaking facility. He also prepared the applications for Department of Environmental Protection air permits. He will provide testimony regarding these issues.

D. Mr. Robert Golden, Vice President and Leader of Energy Facility Licensing Group, TRC Environmental Corporation. Mr. Golden was responsible for

supervising the Coastal Site Plan analysis of the proposed site. He will provide testimony about current site conditions and the consistency of the project with Coastal Management Act policies.

E. Mr. Andrew Degon, Project Engineer, LS Power Development, LLC. Mr. Degon is responsible for the general oversight of technical development activities relating to the expansion project, including performance estimating, equipment evaluation and selection, permitting support, and cost estimating. Additionally, his role includes the coordination of engineering and technical consultants responsible for the development of site layouts, geotechnical and other technical feasibility studies. Mr. Degon will testify regarding site development, water impacts of the proposed peaking facility, in addition to stormwater and drainage analysis.

F. Other witnesses may be called, as necessary, to respond to interrogatories or Council questions, or to address matters raised by parties or intervenors.

II. EXHIBITS

Bridgeport Energy II intends to offer the following documents into evidence at the Council's public hearing on March 4, 2008:

A. Exhibits for Administrative Notice

Bridgeport Energy II requests the Council to take administrative notice of all relevant and applicable federal and state statutes and regulations, and the following administrative documents:

1. The Connecticut Siting Council's "Review of the Ten Year Forecast of Connecticut Loads and Resources, 2007-2016."

2. The Connecticut Siting Council's "Review of the Ten Year Forecast of Connecticut Loads and Resources, 2006-2015."

3. The Connecticut Department of Public Utility Control's "Report on the Electricity Sector Needs of Connecticut, 2007-2021" (revised August 25, 2006).

4. ISO New England, Inc.'s "New England Electricity Scenario Analysis" (August 2, 2007).

5. ISO-New England, Inc.'s "2007 Regional System Plan" (Oct. 18, 2007).

6. ISO-New England, Inc.'s "2006 Regional System Plan" (Oct. 26, 2006).

7. Connecticut Energy Advisory Board "2007 Energy Plan for Connecticut" (Approved Feb. 6, 2007).

8. Connecticut Siting Council, Petition No. 377, Decision and Order (August 6, 1997).

9. The Connecticut Department of Public Utility Control's Investigation of the Process and Criteria for Use in Implementing Section 50 of Public Act 07-242 - Peaking Generation, Final Decision, Docket No. 07-08-24 (Dec. 14, 2007).

B. Exhibits

1. Petition to Connecticut Siting Council 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, dated December 14, 2007 **(Previously filed Application including Attachments plus bulk filing.)**

Attachment A:	Site Location Map
Attachment B:	Site Map and Site Survey
Attachment C:	Aerial Photograph
Attachment D:	General Arrangement Plot Plan
	Section Plan
	Preliminary Landscaping Plan
	Topographic Survey
Attachment E:	Site Renderings
Attachment F:	New Source Review Air Permit Application **(Previous Bulk Filing)**
Attachment G:	Coastal Site Plan Report
	Connecticut Historical Commission Letter dated 1/14/1998
Attachment H:	FAA Determinations
Attachment I:	Grading and Drainage Plan
Attachment J:	Community Consultation

2. Responses to Connecticut Siting Council Interrogatories, dated February 11, 2008 **(Previously Filed)**

3. Pre-filed testimony of D. Blake Wheatley (LS Power Development, LLC)

4. Pre-filed Testimony of Thomas W. Kaslow (Sigma Consultants, Inc.)

5. Pre-filed testimony of Richard Londergan, Ph.D. (EarthTech, Inc.)

6. Pre-filed testimony of Robert Golden (TRC Environmental Corporation)

7. Pre-filed testimony of Andrew Degon (LS Power Development, LLC)

8. State of Connecticut Department of Environmental Protection Natural Diversity Database letter to Mr. Kevin Maher, TRC, dated December 28, 2007.

9. Bridgeport Planning & Zoning approval letter dated January 31, 2008, approving with conditions Coastal Area Management application.

10. South End Neighborhood Council letter of support to Bridgeport Planning & Zoning Commission, dated January 28, 2008 endorsing the Petition to build and operate the proposed peaking unit.

11. Updated Plot Plan – Poster size
(One poster size exhibit available at public hearing only)

12. Site Renderings – Poster size
(One poster size exhibit available at public hearing only)

13. Viewshed Map with Analysis

14. Photographs and Location Map of Signs Providing Notice of Public Hearing of March 4, 2008

15. Revised Site Plans

    15(a) Revised General Arrangement Plan

    15(b) Landscaping Plan

    15(c) Grading & Drainage Plan

16. Anticipated Fuel Truck Route Map from I-95 to Facility

17. Revised Site Renderings

18. Bridgeport Port Authority letter of approval to Connecticut Siting Council dated February 21, 2008.

19. Responses to 60 Main Street, LLC et al Interrogatories, dated February 15, 2008

20. Bridgeport Office of Planning & Economic Development letter of support to Bridgeport Planning & Zoning Commission, dated January 28, 2008.

Bridgeport Energy II, LLC reserves the right to modify this list or to offer additional exhibits necessary and appropriate to address specific topics that may arise, or upon the request of the Siting Council.

Respectfully Submitted,

BRIDGEPORT ENERGY II, LLC

By 

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Petition to Connecticut Siting Council 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, dated December 14, 2007 **(Previously filed Application including Attachments plus bulk filing.)**

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EXHIBIT 1

Responses to Connecticut Siting Council Interrogatories, dated February 11, 2008
(Previously Filed)

EXHIBIT 2

PREFILED TESTIMONY OF BLAKE WHEATLEY

Q. Please state your name, title, and business address.

A. D. Blake Wheatley
General Manager
Bridgeport Energy II, LLC
c/o LS Power Development, LLC
400 Chesterfield Center, Suite 100
St. Louis, Missouri 63017

Q. Please describe your current responsibilities.

A. I am presently the general manager of LS Power Development, LLC, which through an affiliate is co-owner, along with Dynegy, Inc. of Bridgeport Energy II, LLC ("BE II"). LS Power Development, LLC is responsible for the development of the Bridgeport Peaking Station, and I have overall responsibility for the development process. I have been working with LS Power Development, LLC for the past thirteen years in project development and asset management, in each case with an increasing level of responsibility. I am also the asset manager of the Sugar Creek Power Station, a 561 MW natural gas fired combined cycle facility located in West Terre Haute, Indiana.

Q. What is your educational background?

A. I graduated with highest distinction with a B.S. in Electrical Engineering from the Pennsylvania State University and earned an M.B.A. from the University of Richmond.

Q. Have you ever appeared as a witness before any regulatory agency?

EXHIBIT 3

A. Yes, I was the lead witness in the reactive power filing of LSP-Kendall Energy, LLC with the Federal Energy Regulatory Commission in 2006.

Q. What has been your involvement in this project?

A. Since the project's inception and continuing through today, I have had overall responsibility for development of the project. This includes all aspects of project siting, environmental permitting, regulatory approvals, electric transmission, natural gas interconnection, community and city relations, etc.

Q. Were you involved in the preparation of the Petition?

A. Yes. I was generally involved in the preparation of the petition in its entirety and more specifically involved with portions of the Petition addressing the existing Bridgeport Energy facility and the proposed facility, aesthetics, environmental, and community consultations and considerations, as well as the sections addressing the need for the project, the electrical interconnection of the proposed 350 MW peaking facility, and dispatch scenarios.

Q. Were you also responsible for answering any pre-hearing interrogatories?

A. Yes.

Q. Are you prepared to address those sections of the Petition that were prepared under your supervision and control?

A. Yes.

Q. Is the information presented in the portions of the Petition and in the Answers to the Prehearing Interrogatories for which you are responsible true and correct to the best of your knowledge and belief?

A. Yes.

Q. At this time, are there any additions or corrections to those sections of the Petition you referenced earlier?

A. Bridgeport Energy II, LLC is considering certain options to ensure adequate gas pressure to accommodate the needs of both the existing Bridgeport Energy Facility and the proposed peaking units. One option under consideration is the addition of a compression station along the existing Southern Connecticut Gas line within approximately one mile of the project site. Such a new compression station may be owned and operated by Southern Connecticut Gas or by Bridgeport Energy, LLC and/or Bridgeport Energy II, LLC and shall be constructed to comply with applicable Federal, State and local regulations. Bridgeport Energy II, LLC is working closely with Southern Connecticut Gas to determine the most appropriate plan to add compression if it is determined to be necessary.

Bridgeport Energy II, LLC has also revised its construction schedule consistent with the proposal it submitted to the Connecticut Department of Public Utility Control pursuant the Department's implementation of Section 50 of Public Act 07-242 – Peaking Generation. Revised Project milestones are as follows:

Commencement of Construction	12/31/09
Interconnection with Singer Substation	09/30/10
Commercial Operation Date	11/30/10

Bridgeport Energy II, LLC has also reduced the size of its proposed fuel oil storage tank from approximately 1.2 million gallons to approximately 800,000 gallons consistent with the Connecticut Department of Public Utility Control's implementation of Section 50 of Public Act 07-242.

Section IV.B of the Petition referenced Bridgeport Energy II, LLC's Coastal Site Plan Review Application that was submitted to the City of Bridgeport on December 14, 2007. The Application was approved by Bridgeport's Planning & Zoning Commission at its January 28, 2008 hearing. As a condition of the approval, Bridgeport Energy II, LLC will prepare an enhanced landscaping plan for the Planning & Zoning Commission's review.

Q. Can you describe the interconnection studies performed by ISO-NE in connection with the proposed Bridgeport Peaking Station?

A. Bridgeport Energy II, LLC hold's ISO-NE queue positions 159, for up to 325 MW of summer capacity (up to 375 MW of winter capacity) and queue position 239 for up to 360 MW of summer capacity (436 MW of winter capacity). Pursuant to its review for queue position 159, ISO-NE has completed both a short circuit study and a stability study and has determined that the Bridgeport Peaking Station can be interconnected without any transmission upgrades. ISO-NE notes in the Stability Study report that it may contain Critical Energy Infrastructure

Information with a request that it not be released. Bridgeport Energy II, LLC would be willing to provide copies of these reports to the Siting Council under protective seal if desired.

Q. Have you had discussions with United Illuminating Company regarding the interconnection to the electric grid?

A. Yes, we have had several discussions with United Illuminating subsequent to the filing of the Petition regarding construction of the underground cable connecting our site to the new Singer Substation. Pursuant to these discussions, United Illuminating would construct, own and operate the new connecting line from Singer Substation up to the 345 kV disconnect switches to be installed adjacent to Bridgeport Energy II, LLC's step-up transformers. United Illuminating will be seeking any necessary federal, state and/or local approvals to construct this line.

Q. Were you responsible for consulting with the City of Bridgeport and any community groups in the City?

A. Yes. In addition, I have described below additional City and community group consultations that have occurred subsequent to the date of our Petition.

In preparation for the January 28, 2008 hearing before Bridgeport's Planning & Zoning Commission to review Bridgeport Energy II, LLC's Coastal Zone Plan Review Application, we approached the South End Neighborhood Council and

requested that it express its support for the project. In response, they provided the attached letter, which is identified as Petitioner's Exhibit 10.

We have also had two subsequent meetings with City of Bridgeport officials. This included a meeting with Mayor Finch on January 16, 2008. In this meeting, the mayor expressed support for both the 60 Main Street project and Bridgeport Energy II, LLC's proposed peaking facility. The mayor encouraged us to work with the 60 Main Street developers to find solutions that will help both projects succeed. We also met with the City's Deputy Economic Development Director on January 30, 2008 about a potential payment in lieu of taxes arrangement for the facility. This meeting was also successful and we are optimistic that we can reach an agreement with the City to provide tax certainty to both parties in future years.

We have also had several follow-up discussions with a representative of the 60 Main Street development to discuss potential landscaping and aesthetic enhancements to the Facility in an effort to better ease the transition from the several power stations north of Henry Street to the mixed use development proposed by the 60 Main Street developers south of Henry Street. We look forward to the opportunity to meet with the 60 Main Street developers and their architects to discuss practical enhancements to the Bridgeport Peaking Station that will help to see both projects get completed.

Q. Were changes made to the project design to address specific community concerns or to reduce potential environmental impacts?

A. Yes. The proposed building and exhaust stacks were moved approximately 20 feet to the north and east increasing the distance of most equipment from the proposed 60 Main Street development. This has increased the available area for landscaping on the south side of the site. Enhanced landscaping plans are currently being developed and we plan to share these plans with the 60 Main Street developers to obtain their input prior to seeking concurrence of the enhanced plans from Bridgeport's Planning & Zoning Commission. We have also reduced the size of the fuel oil storage tank from 1.2 million gallons to approximately 800,000 gallons consistent with the requirements of the Department of Public Utility Control in its implementation of Section 50 of Public Act 07-242 – Peaking Generation.

Q. Are these changes reflected in the revised site plans that have been submitted to the Council?

A. Yes. The revised site plans are referenced in Andrew Degon's testimony and included as Petitioner's Exhibit 15.

Q. Did BE II post a sign providing the public with notice of the public hearing to be held on March 4, 2008 regarding this Petition?

A. Yes, BE II posted a sign on February 19, 2008 on its property at 10 Atlantic Street, Bridgeport, Connecticut, which is the location of the proposed project.

The sign is visible from Main Street as the sign faces the northwest. Additionally, a second sign, also facing northwest, was posted on the corner of Main & Atlantic Streets at UI's Singer Substation site on February 22, 2008. Photographs and a Location Map of posted signs providing notice of public hearing are included as Petitioner's Exhibit 14.

Q. Does this conclude your testimony?

A. Yes.

PREFILED TESTIMONY OF THOMAS W. KASLOW

Q. Please state your name, title, and business address.

A. Thomas W. Kaslow
Principal Consultant
Sigma Consultants, Inc.
20 Main Street
Acton, Massachusetts 01720

Q. Please describe your current responsibilities and professional experience.

A. I have been employed by Sigma Consultants, Inc. as a Principal Consultant since June 2006. In this role, I provide consulting services to market participants in the New England wholesale electric market, including representing their interests in the New England Power Pool and New England Independent System Operator (ISO-NE) stakeholder processes and other selected regulatory forums.

Prior to joining Sigma Consultants, Inc., I was employed by Calpine Corporation as its Director of Market Policy & Regulatory Affairs for five years. At that time, Calpine Corporation owned and operated five power plants in New England. I was responsible for managing the development and implementation of policies in the wholesale markets, including coordination of company representation and communications within ISO, Regional Transmission Operator (RTO), state and selected Federal Energy Regulatory Commission (FERC) forums for certain of the geographic markets in which Calpine conducted business. Over the course of this tenure, I conducted these activities for electric markets in the southeast United States, the mid-Atlantic region, New York and New England. I also led

EXHIBIT 4

several company efforts at the federal level, including participation in the FERC's Advance Notice of Proposed Rulemaking (ANOPR) process to establish standardized generator interconnection rules and a FERC technical conference process to form a southeast RTO.

Prior to joining Calpine, I was employed for three years as a Director of Market Development by the PG&E National Energy Group (and its predecessor, US Generating Company). US Generating Company, through its US Gen New England LLC affiliate, acquired most of New England Power Company's electric generating units located in the states of New Hampshire, Massachusetts and Rhode Island. In this position, I led the company's market policy and implementation efforts in New England. While in this position, I also represented NEPOOL as an expert witness before FERC on the market design elements of its filing to restructure the NEPOOL tariff and testified on the ancillary service elements at the related FERC hearing.

Prior to joining PG&E National Energy Group, I was employed by New England Power Company for approximately seven years. I held various positions including thermal operations and generation marketing. This work experience included various responsibilities ranging from evaluation of capital projects at generating stations to review and renegotiation of Independent Power Producer purchase contracts and wholesale power marketing to municipal power agencies and selected utilities in New England. In the last two years of that employment, much

of my time was focused on representing the company within the NEPOOL stakeholder process regarding development of the market design aspects of the NEPOOL restructuring, including serving as the chair of the NEPOOL subcommittee which developed the market rules for NEPOOL's initial implementation of competitive wholesale markets for energy and ancillary services.

Q. What is your educational background?

A. I graduated from the University of New Hampshire at Durham with a Bachelor of Science Degree in Mechanical Engineering in 1985. After several years of work in the telecommunications component manufacturing area, I earned a Master in Business Administration Degree from Northeastern University in Boston, Massachusetts in 1991.

Q. Have you ever appeared as a witness before any regulatory agency?

A. Yes. On behalf of BE II, I testified before the Connecticut Department of Public Utility Control in Docket No. 07-08-24 DPUC Investigation of the Process and Criteria for use in Implementing Section 50 of Public Act 07-242 – Peaking Generation. I have also testified before the Federal Energy Regulatory Commission as a NEPOOL expert witness on ancillary service aspects of the initial restructuring of the NEPOOL tariff arrangements.

Q. What has been your involvement in this project?

A. I have served as an advisor on issues relating to the public need for the project and provided assistance regarding the New England wholesale electric market rules.

Q. Were you involved in the preparation of the Petition?

A. I assisted in an advisory capacity with the sections of the petition that relate to the project's need.

Q. Were you also responsible for answering any pre-hearing interrogatories?

A. No.

Q. Are you prepared to address those sections of the Petition that were prepared with your advisory assistance?

A. Yes.

Q. Is the information presented in the portions of the Petition that were prepared with your assistance true and correct to the best of your knowledge and belief?

A. Yes.

Q. At this time, are there any additions or corrections to those sections of the Petition you referenced earlier?

A. Yes. I'd like to clarify the statements on page 9 of the Petition which states, "Finally, the 2006 Forecast predicts that three significant new generation projects, Meriden Gas Turbines in Meriden, Kleen Energy in Middletown, and Towantic Energy in Oxford, will be available beginning in 2009. First, reference to the "Meriden Gas Turbines in Meriden" project should be replaced with "NRG in Meriden." The Meriden and Oxford projects, which the Council approved in 1999, have been delayed and may not be available in 2009, and the Kleen Energy project is still awaiting its air permits. Without the generation from these projects, the short-term need for additional generation will be even greater than projected." The Council's 2006 Forecast did not explicitly predict that the above-mentioned generation projects would be available beginning 2009. Rather, this was BE II's interpretation of the data listed in Table 3 entitled "Connecticut Resource Balance" of the 2006 Forecast, which lists these three projects under the category "Approved Generation Not Completed" and lists the MW output of each respective unit under the 2009 through 2015 columns. BE II interpreted this table to mean that at the time the 2006 Forecast was produced, the Council anticipated that generation from these approved projects may become available in 2009. While Table 3 entitled "Connecticut Resource Balance" of the 2006 Forecast lists the MW output of the Kleen Energy, the Meriden and Oxford projects under the 2009 through 2015 columns, the Council statement at page 7 explains that the 2009 date merely reflected an estimated three year lead time given the uncertain status of those units and not any explicit commercial operation date expectations

of the Council. I would also like to note that the correct cites in the 2006 Forecast for this section of the Petition are page 7 and 9 (Table 3) and not pages 6 and 7.

Q. Are there aspects of the Petition that merit special focus by the Siting Council?

A. Yes. The Petition references the Council's "Review of the Ten Year Forecast of Connecticut Electric Loads and Resources, 2006-2015," which indicates peak demand for electricity continues to grow and that Connecticut will face significant capacity shortage in the next ten years. The Council's "Review of the Ten Year Forecast of Connecticut Electric Loads and Resources, 2007-2016," ("2007 Forecast"), which was not referenced in the Petition, also recognizes this trend of increased peak demand and significant generation capacity shortages (see Table 3, page 13 of the 2007 Forecast). The 2007 Forecast indicates that the State will have a capacity deficit of nearly 1,200 MW by 2009 (see Table 3, page 13 of the 2007 Forecast). Furthermore, the 2007 Forecast recognizes that Southwest Connecticut accounts for approximately one-half of the state's peak load, and is one of the fastest growing and economically vital areas of the state. Additionally, in ISO-NE's 2007 Regional System Plan ("2007 RSP"), like the 2006 RSP referenced in the Petition, stresses the importance of the location of new generation. According to the 2007 RSP, the addition of new dual-fuel, fast-start resources in Connecticut is recommended (see page 12 of the 2007 RSP) and the most effective and preferred location for additional capacity includes Southwest

Connecticut (see pages 39-41 of the 2007 RSP). The proposed peaking facility would add much needed generation precisely where it is desired.

Q. What benefits do you believe the Bridgeport Energy II Project would provide to Connecticut consumers?

A. Based on the information I have reviewed, I believe that the BEII Project would increase reliability and provide an opportunity to decrease electric costs in Connecticut. Specifically, BEII would address an existing deficiency in the supply of forward operating reserves in the Connecticut portion of the ISO New England Forward Reserve Market (FRM). It would also provide additional capacity toward Forward Capacity Market needs and increase the generation available to meet peak energy needs.

Q. How do you reach those conclusions?

A. The supply of forward operating reserves in the FRM has not satisfied the Connecticut and Southwest Connecticut (SWCT) Local Forward Reserve Requirements (LFRR) since the implementation of LFRR in the FRM. The Connecticut reserve zone in the FRM has persistently been clearing at the cap of $14/kw-month due to insufficient supply of forward reserves within that reserve zone. While the same is true of the SWCT reserve zone, ISO New England indicates in its 2007 RSP that upon completion of the SWCT Reliability Project Phase 2 upgrades, there will be sufficient transfer capability to permit ISO New England operators to choose to meet SWCT operating reserve needs with unused

transfer capability into SWCT or meet operating reserves with SWCT resources and a SWCT LFRR will no longer be needed (see pages 43-45 of the 2007 RSP).

While BEII will be interconnected within SWCT and will be able to supply offline (fast start) operating reserves toward any SWCT operating reserve requirement, based on this information and upon completion of the SWCT Reliability Project Phase 2 upgrades, only the Connecticut state-wide LFRR will remain. Absent new fast start generating capability, the state-wide Connecticut supply of fast start generating capability will continue to remain inadequate to satisfy the statewide LFRR. As a result, while BEII will provide the flexibility to supply operating reserves in SWCT and statewide, the primary market need will be for additional fast start capable resources to meet the statewide LFRR. The Connecticut Department of Public Utility Control (CT-DPUC) has also acknowledged this need in its Final Decision in Docket No. 07-08-24 DPUC Investigation of the Process and Criteria for use in Implementing Section 50 of Public Act 07-242 – Peaking Generation (CT-DPUC Decision). In that Decision, the CT-DPUC concludes that it would be in the interest of Connecticut consumers to purchase approximately 500 MW of quick start peaking generation (see page 4 of CT-DPUC Decision).

Q. What is the ISO-NE Forward Reserve Market?

A. The FRM is a mechanism ISO-NE uses to purchase forward commitments to deliver Ten-Minute Non-Spinning Reserve (TMNSR) and Thirty-Minute

Operating Reserve (TMOR) in Real-Time. Sale of forward reserve requires the supplier to deliver TMNSR or TMOR in real time during the 16 peak hours (hour ending 0800 through hour ending 2300) of each weekday that is not a NERC holiday. FRM procurement includes TMOR sufficient to protect against second contingencies in SWCT and statewide in most situations. The LFRR is based on the 95th percentile of historical daily TMOR requirements within the respective reserve zones. As a result, the top 5th percentile of instances are not covered by FRM purchases and where local operating reserve requirements reach those levels, ISO must obtain additional operating reserve from other local resources, including the possible need to either commit out-of-merit generation or withhold some portion of the energy import capability for reserve purposes.

While resources capable of supplying synchronized reserves can offer into the FRM, the FRM design is specifically intended to attract fast start capable resources. Delivery entails making adequate operating reserve capability available in the identified hours and offering the associated energy capability priced at or above a defined Forward Reserve Threshold Price. The Forward Reserve Threshold Price is set such that forward reserve generating capability will, in most hours, not be scheduled as energy. Since these rules may require on-line providers of operating reserve to self-commit the minimum block of energy on their unit and become a price taker in the energy market for those megawatts and further require the megawatts offered as forward operating reserves to be priced out of

the energy market economics in most hours, the opportunity costs involved in offering synchronized reserve into the FRM can be extremely high.

ISO-NE procures forward reserve resources through FRM auctions two times a year. In the fall of each year, ISO-NE procures FRM supply for the eight winter months (October 1 through May 31), and in the spring for the upcoming four summer months (June 1 through September 30).

Q. How much additional quick start generation is needed to fulfill the ISO-NE Forward Reserve Requirement for Connecticut?

A. In the FRM auction for the summer 2007 period, only 515MW in SWCT and an additional 210 MW of supply in the rest of Connecticut were offered into the auction for a total of 725MW toward that summer's LFRR of 520 MW of TMOR for SWCT and 1055 MW of TMOR for Connecticut. The total Connecticut FRM supply offered into this auction is consistent with the ISO-NE 2007 RSP which identifies existing fast start summer capacity inside CT at 731 MWs. The small deviation between the numbers can be accounted for by possible risk management strategies employed by the bidders to either account for possible temperature related de-ratings of their capability on very hot days or otherwise minimize the risk of incurring Failure to Supply penalties under the ISO-NE FRM rules. Based on this information, Connecticut was 330MW deficient in thirty minute start capable resources for summer 2007. That is, Connecticut would have needed another 330 MWs to just meet the LFRR for the state of Connecticut. Based on

the ISO-NE 2007 RSP, the statewide Connecticut LFRR for TMOR is projected to be between 1100-1200 MW through at least 2011. With the 731 MW of fast start capability identified in the 2007 RSP, this leaves a prospective deficiency of 369-469 MW. While the 2007 RSP does not provide a projection beyond 2011, these values appear to remain valid for subsequent years absent significant changes.

Q. If the Connecticut FRM deficiency is 369-469 MW, why does the CT-DPUC Decision target procurement of 500MWs of additional fast start, peaking generation capability?

A. The CT-DPUC Final Decision appears to seek fast start generating units supply to a level slightly in excess of the ISO-NE's minimum requirement for several reasons. Specifically, out of an apparent concern that having just enough fast start capability to meet the minimum requirement will not necessarily assure lower FRM prices inside Connecticut, the CT-DPUC is of the belief that procurement of a certain quantity of "overhang" capability (capability in excess of the minimum LFRR) is necessary to consistently deliver Connecticut FRM prices below the $14/kw-month cap (see pages 19-22 of CT-DPUC Decision). The CT-DPUC also identifies other additional possible benefits that this overhang capacity might provide including reduction in on-peak energy prices (page 19 of the CT-DPUC Decision). The CT-DPUC conditions its target quantity, including the "overhang " portion of the 500 MW target, as depending on the level of fast start capacity

which commits to enter the New England market and locate inside Connecticut by clearing in the first Forward Capacity Auction.

Q. Do we know how many new Connecticut fast start resource megawatts cleared in the first Forward Capacity Auction?

A. While ISO-NE has not yet released all of the auction outcome detail, ISO-NE did issue a February 13, 2008 press release identifying the total new Connecticut generating capacity which cleared in the first Forward Capacity Auction held on February 4-6, 2008. By comparing those results with the information on the bids of qualified new capacity provided in ISO-NE's Informational Filing for Qualification in the Forward Capacity Market (FERC Docket No. ER08-190-000 filed on November 6, 2007) with the FERC, specifically, the information regarding new Connecticut capacity offered as Existing Capacity into the Forward Capacity Auction, I have deduced that the 354MW of new Connecticut capacity which cleared in the Forward Capacity Auction most likely includes the following units:

Wallingford-Pierce generating facility	75 MW
Waterbury generating facility	95.7 MW
CMEEC Wallingford diesel generating facility	2 MW
CT Jet Power Cos Cob 13 & 14	34 MW
Millstone 3 incremental generation	80 MW
DFC-ERG Milford	8 MW
Ansonia generating facility	80 MW

Total	354 MW	

Of these new capacity resources, I have assumed that the Wallingford-Pierce, Waterbury, CMEEC Wallingford diesel, and CT Jet Power Cos Cob 13 & 14 units will provide additional fast start capability yielding a total of 207MW of potential new supply in the Connecticut FRM market.

Q. Based on these results, how does this new capacity change the need for new fast start capacity inside Connecticut?

A. If the addition of 207MW of new fast start capacity is fully realized, this would decrease the extent of deficiency from approximately 369-469 MW (based on ISO 2007 RSP level of 1100-1200 MW of LFRR for Connecticut) to approximately 160-260 MW. Similarly, the initial CT-DPUC target procurement level of 500MW would likely decrease by approximately 207MW as well.

Q. Are there any other considerations regarding the FRM and the CT-DPUC planned procurement of additional peaking capacity relevant to the Connecticut Siting Council's considerations?

A. Yes. The ISO-NE statewide LFRR reflects the level of minimum supply required to just meet the requirement and the quantity of new, fast start generation targeted in the CT-DPUC Decision reflects desired procurement levels. However, both procurement processes seek sufficient competitive offers to yield the most efficient price outcomes for consumers. While it is difficult to determine how

many new resources beyond the bare minimum are needed to achieve efficient price outcomes, additional fast start generator options beyond the DPUC target procurement levels is beneficial to facilitate good competition between suppliers in these respective procurement processes.

With the exception of the Council's approval of Devon 15-18 units, reflecting possible additional capability of 200MW, the fast start generating resources approved to date by the Council have either been built or were considered among the new, fast start resources which have cleared in the Forward Capacity Auction. With anticipated fast start unit deficiencies in the 160-260 MW range, the Devon 15-18 capability would not allow Connecticut to satisfy the full range of expected LFRR sought in the ISO-NE FRM nor in the CT-DPUC Final Decision. Furthermore, under competition, lowest cost outcomes are expected where the available choices exceed the minimum LFRR requirement.

Q. While your identification of need has focused on the FRM, would BEII provide benefits to Connecticut consumers in other markets?

A. Yes. While Connecticut's most acute supply need is in the ISO-NE FRM, the approval of BEII as a fast start, peaking generator Connecticut supply option offers benefits to consumers in other markets as well. While the most recent Forward Capacity Auction reveals that the Connecticut installed capacity supply exceeds its statewide local installed capacity requirement, assuming no generator retirements in Connecticut, this excess will be absorbed by further load growth in

coming years. If existing generators are retired, this need for new capacity inside Connecticut could arrive sooner.

The Council's 2007 Forecast and the ISO-NE 2007 RSP each reference a set of potential additional transmission upgrades referenced as the New England East West Solution (NEEWS) which may increase import capability into Connecticut and may thereby reduce or eliminate the local sourcing requirement for installed capacity inside Connecticut under the Forward Capacity Market. These reports further indicate that the technical approval of the NEEWS plan has not yet been completed. While it is likely that some configuration of upgrades currently contemplated as NEEWS will be completed, the addition of BEII installed capacity supply inside Connecticut offers a valuable hedge to Connecticut consumers against either a situation where the NEEWS design does not substantially reduce the Connecticut local sourcing requirement or the NEEWS completion date does not precede the new installed capacity need in Connecticut.

Finally, BEII would offer additional access to peaking energy supply inside SWCT and Connecticut and decrease the instances where more expensive generation must be run to meet peak load needs or otherwise activate more expensive generation in response to contingencies.

Q. Does this conclude your testimony?

A. Yes.

PREFILED TESTIMONY OF RICHARD LONDERGAN

Q. Please state your name, title, and business address.

A. Richard Londergan, Ph.D., Senior Program Director
Earth Tech Inc.
300 Baker Avenue, Suite 290
Concord, MA 01742

Q. Please describe your current responsibilities and professional experience.

A. I am presently the senior technical leader for air permitting and modeling in Earth Tech's Concord, MA office. I direct modeling applications both for individual sources and for regional air quality analyses. For over 30 years, I have designed and managed studies to address air quality compliance issues, including field measurements, wind-tunnel studies and model performance evaluation studies. I have directed modeling studies for a wide variety of emission sources, including fossil-fueled power plants, refineries and chemical plants, mines, steel mills, manufacturing facilities, and mobile sources. I have performed environmental assessments, compliance audits and risk assessments, developed and presented training programs, and provided expert testimony. A more detailed summary is provided in my resume which is attached hereto.

Q. Have you ever appeared as a witness before any regulatory agency?

A. Yes. I have appeared before the Connecticut Siting Council, and at Public Hearings convened by the Department of Environmental Protection, on behalf of Power Development Corporation, in connection with applications for power generation facilities in Milford and Meriden. I have also presented testimony at

EXHIBIT 5

the U.S. EPA Conference on Air Quality Modeling (on three separate occasions) and at a 2001 hearing in Bismarck, ND on Long Range Transport Modeling for Class I Areas.

Q. What has been your involvement in this project?

A. I am the Earth Tech project manager for this project. Earth Tech prepared the air permit application to CTDEP.

Q. Were you involved in the preparation of the Petition?

A. Yes. I managed the preparation of the PSD/New Source Review air permit application to CTDEP for this project. I oversaw the control technology (BACT/LAER) evaluation. All of the dispersion modeling was performed under my direct supervision, and I was the principal author of the application documents.

Q. Were you also responsible for answering any pre-hearing interrogatories?

A. No.

Q. Are you prepared to address those sections of the Petition that were prepared under your supervision and control?

A. Yes.

Q. Is the information presented in the portions of the Petition for which you are responsible true and correct to the best of your knowledge and belief?

A. Yes.

Q. At this time, are there any additions or corrections to those sections of the Petition you referenced earlier?

A. No.

Q. Were significant project development decisions made with regard to the design of the project to reduce potential environmental impacts caused by air emissions?

A. Yes. The primary fuel for the project is natural gas, which is the cleanest burning fossil fuel. In addition, the project will use ultra low sulfur fuel oil (15 ppm sulfur) as a back up fuel for only a limited period of time (no more than 500 hours at the plant's maximum firing rate). The facility also incorporates dry low NO_x burners and selective catalytic reduction (SCR) to reduce nitrogen oxide (NO_x) emissions. The proposed stack height was increased, in order to reduce the potential impacts of the project on ambient air quality.

Q. Have you reached any conclusions regarding the air quality impacts of the proposed project?

A. Yes.

Q. What are your conclusions?

A. I have concluded that the proposed project will comply with all applicable air quality standards and requirements. Further, based on the air quality dispersion modeling required by the Connecticut DEP, the air quality impacts from the facility will be de minimus; that is, they are below the significant impact levels set by the State.

Q. Does this conclude your testimony?

A. Yes.

RICHARD J. LONDERGAN **Senior Program Director**

EDUCATION

PhD, Physics, Carnegie Mellon University, Pennsylvania, 1973
MS, Physics, Carnegie Mellon University, Pennsylvania, 1969
BS, Physics, Carnegie Mellon University, Pennsylvania, 1967

EXPERIENCE SUMMARY

Dr. Londergan is senior program director in the Environmental Compliance and Permitting Group of Earth Tech, focusing on air quality modeling, air permitting and regulatory analysis. He has more than 30 years of professional experience as an air quality consultant. He directs modeling applications both for individual sources and for regional air quality analyses. Dr. Londergan has designed and managed studies to address air quality compliance issues, including field measurements, wind-tunnel studies and model performance evaluation studies. He has directed modeling studies for a wide variety of emission sources, including fossil-fueled power plants, refineries and chemical plants, mines, steel mills, manufacturing facilities, and mobile sources. Dr. Londergan has experience with management of projects for federal and state agency clients, including the Environmental Protection Agency, USDA Forest Service and Defense Department (Army, Air Force, and Navy). He has performed environmental assessments, compliance audits and risk assessments, developed and presented training programs, and provided expert testimony.

PROJECT EXPERIENCE

Modeling for PSD/New Source Review and Compliance Analysis

Great River Energy, Vision 21 Feasibility Study for Lignite-Fired Generating Unit, Western North Dakota. Air modeling task manager for evaluation of candidate sites for a new lignite-fired generating unit. In Phase I, managed evaluation of three candidate sites, where potential impacts of the proposed new unit on air quality and visibility in Class I areas were a critical issue. Modeling by the state and EPA revealed predicted exceedances of the PSD Class I increments for SO2. Long-range transport modeling with CALPUFF was performed to assess project impacts and determine effects of emission offsets on predicted impacts. Modeling results demonstrated the air quality benefits that could be achieved by candidate offset scenarios. [2001]

Duke Energy, PSD/New Source Review Permit Application for 520-MW Electric Generation Peaking Facility, Summer Shade, Kentucky. Air modeling task manager for preparation of air permit application for a gas-fired simple-cycle peaking facility. Prepared modeling protocol and supervised the air dispersion modeling. A separate modeling analysis was performed to assess potential impacts on a PSD Class I area located within 60 km of the Project. Prepared protocol for Class I assessment and performed modeling to assess impacts on visibility and regional haze, using the CALPUFF model developed by Earth Tech, following guidance of the Federal Land Managers Air Quality Workgroup (FLAG). [2001]

US Army Corps of Engineers - Ground-Based Missile Defense Program (subcontract to CSC), New Source Review Permit Application and PM-10 Monitoring Plan for Missile Defense Facility, Fort Greely, Alaska. Air modeling task manager for preparation of air permit application for the missile defense test bed facility. The permit application addressed the potential emissions and air quality impacts of the proposed test bed facility, in combination with the

existing sources at Fort Greely. The primary emission sources of concern were new and existing generators and existing boilers. Prepared modeling protocol, participated in defining the permitting strategy, met with Alaska DEC and supervised the air dispersion modeling. A separate modeling analysis was performed to assess potential impacts during the construction phase of the project. After the initial air permit was approved, supervised the preparation of a PM-10 ambient air quality monitoring plan for the facility, contributed to the preparation of the Title V Operating Permit, and prepared a second air permit application for the operational phase of the facility. A third air permit application is currently being prepared to incorporate further revisions to the missile defense facility. To gain operational flexibility, two separate operating permits are being developed, one for the existing facility (residential and airfield) and a second for the missile defense facility. [2002-2006]

Duke Energy, PSD/New Source Review Permit Application for 530-MW Electric Generation Facility, Washington County, Ohio. Air modeling task manager for preparation of air permit application for a dual-fuel combined-cycle generating facility. Prepared air quality and meteorology sections of Ohio Power Facility Siting Board application. Supervised air dispersion modeling for criteria air pollutants and modeling assessment of potential fogging/icing impacts of cooling tower. Prepared summary of modeling results and background air quality for public hearing on permit application. [2000]

Duke Energy, PSD/New Source Review Permit Application for 520-MW Electric Generation Peaking Facility, Marble Hill, Missouri. Air modeling task manager for preparation of air permit application for a gas-fired simple-cycle peaking facility. Prepared modeling protocol and supervised air dispersion modeling, including modeling assessment of potential impacts on a PSD Class I area located within 40 km of the project. Performed modeling to assess impacts on visibility, using the EPA VISCREEN model, and regional haze, using the CALPUFF model developed by Earth Tech. [2000]

Power Development Corporation, PSD/New Source Review Permit Application for 544-MW Electric Generation Facilities, Milford, CT. Air modeling task manager for preparation of air permit applications for two dual-fuel combined-cycle generating facilities. Supervised air dispersion modeling for criteria air pollutants, authored modeling report section of application, and performed modeling assessment of potential fogging/icing impacts of cooling tower. Prepared summary of modeling results and background air quality for public hearing on Milford permit application. [1998]

Power Development Corporation, PSD/New Source Review Permit Application for 544-MW Electric Generation Facilities, Milford, CT and Meriden, CT. Air modeling task manager for preparation of air permit applications for two dual-fuel combined-cycle generating facilities. Supervised air dispersion modeling for criteria air pollutants, authored modeling report section of application, performed modeling of visible plume to provide impact assessment for Ridgeline Protection regulation. Prepared summary of modeling results and background air quality for public hearing on permit application. [1998-99]

Northern States Power, Multiple Pathway Risk Assessment for Air Toxics Compounds, Minnesota. Managed dispersion modeling analysis for an NSP power plant and ash disposal site evaluated as a test application for a proposed state regulation to require risk assessment for existing major sources of air emissions in Minnesota. Applied the EPA Building Profile Input Procedure and the Industrial Source Complex (ISCST3) model to estimate concentrations of air toxics in the region surrounding the two facilities. [2000]

Regional Photochemical Air Quality Studies

Wisvest Connecticut and NRG Energy, Photochemical Modeling to Assess Power Plant Impact, Connecticut. Managed a modeling study to assess the potential impact on ozone air quality of reducing NOx emissions from six Connecticut power plants. The photochemical grid model CAMx2 was applied with three-level nesting (36-12-4 km), with a 4-km grid encompassing Connecticut, Long Island, and the NYC metropolitan area. The July 1995 OTAG episode was modeled, using the OTAG emissions inventory to define base case emissions. Results demonstrated emissions from the subject sources had minimal impact on peak ozone levels. [2000]

Texas Natural Resources Conservation Commission, Photochemical Modeling Review, Southeast Texas. Managed a comprehensive review of the modeling approach and all model inputs for three episodes. The study objective was to identify potential improvements in the modeling methodology. UAM-V was applied to the COAST domain to estimate ozone concentrations for the Houston-Galveston and Beaumont-Port Arthur nonattainment areas. Review included evaluation of meteorological and emissions inputs, initial and boundary conditions, choices of model options and measurements available for testing model performance. [1997]

General Public Utilities, Meteorological Analysis for NARSTO, Northeast US. Manager of project to analyze meteorological conditions associated with regional peak ozone episodes observed during the summer 1995 field measurements program. The goal was to characterize regional transport conditions and synoptic and mesoscale meteorology associated with peak ozone events. Trajectories of upper-level and surface-level transport were developed for two episodes with high observed ozone concentrations. [1997]

Model Performance Evaluation and Applied Research Studies

US Department of Agriculture - Forest Service, Sensitivity Study of Aerial Spray Model. Manager and technical lead for a technical review and sensitivity study of the AGricultural DISPersal (AGDISP) model. The AGDISP model was developed for the Forest Service to predict deposition and drift for aerial spray applications. The study involved a systematic analysis of model sensitivity to aircraft and release characteristics, drop-size distribution, meteorological inputs, and canopy/ground surface characteristics. Managed consistency checks and tests for mass balance and mass conservation. A second study was performed to investigate mass conservation issues in greater detail. [2004-2005]

Electric Power Research Institute, Plume Model Validation and Development Study. Technical lead for statistical design and protocol development, plus technical oversight of model evaluation activities for this 10-year, multi-site research project to develop improved models for large buoyant stack plumes. Results demonstrated deficiencies in regulatory models and led to development of the Hybrid Plume Dispersion Model. [1980]

USEPA, Model Performance Evaluations. Technical director for a series of systematic model performance evaluation studies to compare model predictions with air quality measurements. Directed the statistical design of model evaluation procedures and oversaw implementation of evaluation studies for the following categories of regulatory models: rural, urban, complex terrain, mobile source, area source, and dense-gas models. [1978-1990]

American Petroleum Institute, Relationships between Air Quality and Meteorology. Technical director for a research project to study relationships between meteorological variables and air quality concentrations of ozone and carbon monoxide in the northeastern US. Utilized multiple linear regression and analysis of variance techniques to identify critical meteorological variables associated with elevated pollutant concentrations. [1985]

Air Quality and Regulatory Strategy Analysis

Great River Energy, Technical Comments for North Dakota Hearing on Modeling for Class I Areas, Western North Dakota. Technical lead for preparation of testimony concerning air quality modeling procedures for assessing PSD air quality impacts and increment consumption for Class I areas. The North Dakota Department of Health convened a hearing to solicit comments on the state's procedures for assessing increment consumption in Class I areas. The issues central to the hearing concerned the state's modeling procedures, and a related policy dispute between North Dakota and EPA Region VIII. Prepared and presented hearing testimony concerning the technical merits of CALPUFF, the model recommended by both North Dakota and EPA Region VIII, and the importance of using available air quality measurements, in conjunction with modeling estimates, to assess increment consumption. [2002]

Wisvest-Connecticut, LLC, Air Quality and Emissions Analysis to Assess Power Plant Impacts. Technical and project manager for statistical analysis and graphical displays comparing observed air quality (SO2 and fine particulates) with power plant emissions for 1989 through 1998. Observed ambient concentrations in Bridgeport, New Haven and statewide showed no detectable response to the large changes in annual power plant emissions that occurred over this 10-year period. Study results indicate ambient concentrations of SO2 and fine particulates are dominated by regional transport and commercial/residential space heating. Presented study findings at legislative committee hearing. [2001]

Confidential Client, Environmental Compliance Audit. State lead and regional team manager for a national audit program to assess the environmental permit and compliance status of distribution and retail facilities for a national retail chain. The project was performed by a team of consulting firms, working under the direction of legal counsel. Managed the review of regulatory requirements, development of protocols, auditor training, and preparation of audit reports for over 100 facilities in the Northeast region. Permit applications were prepared and procedures developed to address any identified noncompliance. [2004]

Metropolitan Edison Company, Air Quality Modeling/Permitting Support. Manager of a task order contract to provide air quality modeling, permitting, and measurement services to address requirements of the 1990 Clean Air Act Amendments. Specific tasks included complex terrain modeling; fluid modeling for GEP stack height analysis; design, installation, and operation of meteorological measurement programs; permitting support for a new 150 MW combustion turbine, including modeling and BAT control technology evaluation; analysis of alternative strategies to meet Title IV Acid Rain emission limits; and tracking regulatory developments under Title I and Title V, including photochemical modeling and NOx RACT regulations. [1993 - 1995]

Northeast Graphics, North Haven, Connecticut. Provided regulatory and engineering assistance in preparing the Title V permit application for an offset printing facility, and preparation of the "permit to construct and operate" for facility expansion to replace two offset printing units. Tasks for Title V include review of emissions inventory, determination of applicable regulatory requirements, and assistance with permit strategy. For facility modification,

tasks include preparation of applications package and assistance with permit strategy to formulate plant-wide applicable limit for VOC emissions.

World Color Press, Air Permitting, North Haven, Connecticut. Managed the air emissions inventory, compliance analysis and permitting for an offset printing facility. Collected of vent flow measurements and prepared air permit applications for two new web presses, including ACT analysis and calculations to demonstrate compliance with Connecticut air toxics regulation.

Metropolitan Edison Company, Air Quality Modeling/Permitting Support. Manager of a task order contract to provide air quality modeling, permitting and measurement services to address requirements of the 1990 Clean Air Act Amendments. Managed complex terrain modeling; fluid modeling for GEP stack height analysis; design, installation and operation of meteorological measurement programs; permitting support for a new 150 MW combustion turbine, including modeling and BAT control technology evaluation; analysis of alternative strategies to meet Title IV Acid Rain emission limits; and tracking regulatory developments under Title I and Title V, including photochemical modeling and NOx RACT regulations for ozone nonattainment.

United Technologies Corporation, Air Regulatory Analysis, Connecticut. Analyzed proposed EPA and Connecticut regulations to implement several facets of the 1990 Clean Air Act Amendments, including Title V operating permits, enhanced monitoring regulations, and new source review. Senior reviewer for a Title V manual prepared for UTC facility managers. Created a data base to identify UTC facilities located in ozone nonattainment areas. For UTC's Connecticut facilities, analyzed the Connecticut SIP and state air regulations to identify "applicable requirements" that will become federally enforceable under Title V.

Fort Devens Army Base, Air Emissions Inventory and Operating Permit, Massachusetts. Technical lead for preparation of an updated emissions inventory and operating permit application for a large US Army facility that encompasses a wide variety of operations, including space heating for over 300 buildings, fueling and maintenance for a large vehicle fleet (gasoline stations and paint spray booths), emergency generators, firing range, water supply and wastewater treatment, open burning, and venting from a closed landfill. The permitting strategy for Fort Devens was complicated by the ongoing closure process, which will affect many of the operations that represented the largest air emission sources. A permit application to limit potential to emit to below major source thresholds was prepared.

Letterkenny Arsenal, Air Emissions Inventory and Operating Permit, Pennsylvania. Provided senior review for preparation of an updated emission inventory and operating permit application. Developed reasonable emission estimates for open burning and open detonation, which was complicated because standard methods produced extremely large estimates, particularly for open detonation. Other important operations included space heating, fueling and maintenance for a large vehicle fleet (gasoline stations and paint spray booths) and emergency generators. A complete Title V Operating Permit application package was prepared.

Pennsylvania Electric Company, Strategies for Regulatory Compliance. Technical director and project manager for a series of modeling studies to assess the air quality impacts of alternative strategies for achieving compliance with GEP stack height and acid rain requirements. Directed fluid modeling studies to assess the effects of terrain-induced downwash on plume dispersion for two sites. Predicted multi-source impacts from a group of four coal-fired generating stations located in complex terrain for a matrix of emission scenarios involving scrubbing, fuel sulfur reductions, and stack modifications.

Lake Michigan Air Directors Consortium, Model Code Verification. Performed quality assurance project to review the model codes of the regional photochemical model UAM-V, the prognostic meteorological model CAL RAMS, and the intermediate processor programs used to create UAM-V input files from CAL RAMS output. Conducted test runs of both models to confirm transferability. Identified coding and documentation errors, which were resolved through this review process.

Electric Power Research Institute, Winter Haze Study, Dallas-Fort Worth, Texas. Manager of independent quality assurance audits for a multiyear measurements and modeling study to assess the contribution of several lignite-burning power plants to fine-particle haze. Reviewed an intensive measurements program that included aircraft and ground-based measurements of gaseous and aerosol pollutants, tracer releases from sources of concern, and light scattering/extinction. Audits provided independent estimates of measurement accuracy and verified monitoring procedures.

Pennsylvania Electric Company - Site Specific Model Comparison Studies, Western Pennsylvania. Technical and project manager for studies to compare the performance of EPA recommended (guideline) and alternative models for complex terrain applications. Developed monitoring network designs and model evaluation protocols for three locations. Protocol has been implemented for two sites. Results demonstrated superior performance by the alternative model.

Electric Power Research Institute, Plume Model Validation and Development Study. Technical lead for statistical design and protocol development, plus technical oversight of model evaluation activities for this 10-year multi-site research project to develop improved models for large buoyant stack plumes. Results demonstrated deficiencies in regulatory models and led to development of the Hybrid Plume Dispersion Model.

USEPA, Model Performance Evaluations. Technical director for a series of systematic model performance evaluation studies to compare model predictions with air quality measurements. Directed the statistical design of model evaluation procedures and oversaw implementation of evaluation studies for six categories of regulatory models: rural, urban, complex terrain, mobile source, area source, and dense gas/accidental release models.

US Navy, Impact Analysis for Rocket Engine Test Firing, San Nicolas Island. Performed air dispersion modeling analysis to assess the potential impacts of air emissions from the test firing of rocket engines. Standard modeling techniques are designed primarily for (vertical) stack releases. The INPUFF dispersion model was adapted for application to a high-temperature horizontal release. Meteorological conditions which enhanced plume dispersion and minimized the impacts of emissions were identified, so that testing could be performed during favorable conditions.

US Navy, NOx RACT Strategy, New London Submarine Base, Connecticut. Performed regulatory analysis and provided recommendations for the NOx RACT compliance plan for this facility. Potential emissions from several large boilers make SUBASENLON a major source of NOx emissions. A strategy to limit potential to emit and avoid the installation of costly controls without imposing unacceptable constraints on operations was proposed.

American Petroleum Institute, Relationships between Air Quality and Meteorology, Northeastern United States. Technical director for a research project to study the relationships between meteorological variables and air quality concentrations of ozone and carbon monoxide.

Used multiple linear regression and analysis of variance techniques to identify critical meteorological variables associated with elevated pollutant concentrations.

American Petroleum Institute, Offshore and Coastal Dispersion, California and Louisiana. Technical director and project manager for a model evaluation study to compare observed and predicted concentration for a series of offshore release experiments. Conducted systematic evaluation of the OCD model and alternative modeling approaches during periods of stable, onshore flow.

Utility Air Regulatory Group, Complex Terrain Model Evaluations, Eastern United States. Technical director and project manager for studies to compare the performance of EPA recommended (guideline) and alternative models for complex terrain. Assisted UARG in preparing technical materials to support regulatory use of improved complex terrain modeling techniques. Conducted a feasibility study to develop a complex terrain model specifically designed for application to terrain.

EARTH TECH HEALTH & SAFETY TRAINING

01 - Safety Orientation 02/02/2006
02 - Hazard Communication (US) /WHMIS (Canada) 06/16/2005
13 - Field Safety 4-Hour 03/01/2005
14 - Office Ergonomics Training 06/16/2005

PROFESSIONAL MEMBERSHIPS

Air and Waste Management Association
Sigma Xi

PUBLICATIONS

Harold W. Thistle, M.E. Teske, J. Droppo, C.J. Allwine, S.L. Bird and R.J. Londergan, "AGDISP as a Source Term in Far-Field Modeling and Near Field Geometric Assumptions", Paper Number 051149, ASAE Annual Meeting, Tampa, FL, July 2005.

Gary E. Moore and R.J. Londergan, "Sampled Monte Carlo uncertainty analysis for photochemical grid models," *Atmospheric Environment 35*, 4863-4876, 2001.

Gary E. Moore and R.J. Londergan, "Development of a Method to Determine the Technical Level of Significance of Model Output Air Quality Impacts," American Petroleum Institute, August 2001.

Richard J. Londergan, "Modeling Assessment – Impact of Power Plant Emissions on Peak Ozone Concentrations in Connecticut," Wisvest-Connecticut, LLC and NRG Energy, Inc., April 2000.

R.J. Londergan, G.E. Moore and M.E. Fernau, "Meteorological Analysis of a 1995 NARSTO-Northeast Ozone Episode," Technical Paper No. 97-RA94A.06, AWMA Annual Conference, Toronto, 1997.

R.J. Londergan, M.E. Fernau, G.E. Moore and J.C. Chang, "Peer Review of Urban Airshed Modeling," Report 20133, Texas Natural Resource Conservation Commission, Austin, TX, 1996.

R.J. Londergan, G.E. Moore and M.E. Fernau, "Meteorological Analysis of a 1995 NARSTO-Northeast Ozone Episode," Technical Paper No. 97-RA94A.06, AWMA Annual Conference, Toronto, 1997.

R.J. Londergan, M.E. Fernau, G.E. Moore and J.C. Chang, "Peer Review of Urban Airshed Modeling," Report 20133, prepared for the Texas Natural Resource Conservation Commission, Austin, Texas, 1996.

R.J. Londergan and J.L. West, "The Problem of Load-Dependent NOx Emission Rates for Computing Averages from CEM Data," presentation at Electric Power Research Institute CEM Users Group, Minneapolis, 1994.

R.J. Londergan and D.J. McNaughton, "Analysis of Regional-Scale Ozone Concentrations in the Eastern U.S.," technical paper for 1994 TAPPI Environmental Conference, Portland, Oregon.

R.J. Londergan and D.J. McNaughton, "Characteristics of Rural Ozone Concentrations in the Eastern U.S.," Technical Paper No. 93-MP-14.05, AWMA Annual Conference, Denver, 1993.

M.K. Anderson, R.J. Londergan, V.J. Brisini, and T.E. McKenzie, "Model Performance Comparison in Complex Terrain," Technical Paper No. 93-MP-2.07, AWMA Annual Conference, Denver, 1993.

R.L. Petersen, D.K. Parce, J.L. West, and R.J. Londergan, "Effect of a Nearby Hill on Good Engineering Practice Stack Height," Technical Paper No. 93-MP-2.04, AWMA Annual Conference, Denver, 1993.

J.G. Zapert, R.J. Londergan and H.S. Thistle, "Evaluation of Dense Gas Simulation Models," EPA-450/4-90-018, May 1991.

H.S. Thistle and R.J. Londergan, "Review and Evaluation of Area Source Dispersion Algorithms for Emission Sources at Superfund Sites," EPA-450/4-89-020, November 1989.

D.J. Wackter, R.J. Londergan and G.F. Hoffnagle, "API Evaluation of Urban Dispersion Models with the St. Louis RAPS Data Base," API Publication No. 4457, June, 1987.

R.J. Londergan, "Evaluation of Air Quality Estimates for Materials Damage Assessment," Technical Paper 86-85.6, APCA Annual Conference, Philadelphia, 1986.

M.A. Atwater and R.J. Londergan, "Differences Caused by Stability Class on Dispersion in Tracer Experiments," Atmospheric Environment 19, 1945, 1985.

S.D. Reynolds, C. Seigneur, T.E. Stoeckenius, G.E. Moore, R.G. Johnson, R.J. Londergan, "Operational Validation of Gaussian Plume Models at a Plains Site," Report EA-3076, Electric Power Research Institute, Palo Alto, CA, 1984.

D.J. Wackter and R.J. Londergan, "Operational Evaluation of Eight Complex Terrain Models for Potential Use in Regulatory Applications," Technical Paper J1.6, Fourth Joint Conference on Applications of Air Pollution Meteorology, Portland, Oregon, October 1984.

R. Londergan and D. Murray, "The Role of Quality Assurance in Model Validation Studies," International Specialty Conference on Quality Assurance in Air Pollution Measurements, Boulder, CO, 1984.

R. Londergan and M. Anderson, "An Evaluation of Model Performance for Predicting Onshore Impacts from Offshore Sources," Fourth Joint Conference on Applications of Air Pollution Meteorology, Portland, OR, 1984.

D.J. Wackter and R.J. Londergan, "Evaluation of Complex Terrain Air Quality Models," EPA-450/4-84-017, 1984.

M.A. Atwater and R.J. Londergan, "Quantitative Determination of Meteorological Influence on Concentrations of Air Pollutants," American Petroleum Institute, 1984.

N. Bowne, R. Londergan, D. Murray, and H. Borenstein, "Overview, Results and Conclusions for the EPRI Plume Model Validation Project: Plains Site," EA-3755, EPRI, 1983.

R. Londergan, D. Minott, D. Wackter, and R. Fizz, "Evaluation of Urban Air Quality Simulation Models," EPA-4350/4-83-020, 1983.

M. Atwater, R. Londergan, R. Fizz, "Development of Improved Dispersion Estimates in Tracer Experiments," API Publication No. 4376, 1983.

R.P. Burkhart, R.J. Londergan, R.A. Rothstein, H.S. Borenstein, "Comparative Performance Evaluation of Two Complex Terrain Dispersion Models," Technical Paper 83-47.4, APCA Annual Meeting, Atlanta, Georgia, June 1983.

Londergan, R.J., J. Mangano, H. Borenstein, "An Evaluation of Gaussian Model Performance Using Tracer Study Data," American Petroleum Institute, API Publication No. 4344, February 1982.

Minott, D.H., R. Londergan, W. Cox, J. Tikvart, "Comparative Performance Evaluations of MPTER and Alternative Rural Models," Technical Paper 82-3.4, APCA Annual Meeting, New Orleans, LA, June 1982.

Londergan, R.J., "Quantifying and Communicating Uncertainty in Regulatory Air Quality Modeling - Actual Uncertainties in Practice," invited paper, AMS Workshop on Model Uncertainty, Woods Hole, MA, September, 1982.

R. Londergan, et al, "Evaluation of Rural Air Quality Simulation Models," EPA-450/4-83-003, 1982.

Londergan, R.J., J. Mangano, H. Borenstein, "Comparison of Dispersion Predicted by Gaussian Models with Observed Tracer Dispersion." Technical Paper 81-20.5, APCA Annual Meeting, Philadelphia, PA, June 1981.

Londergan, R.J., et al., "EPRI Plume Model Validation Project: Model Performance Evaluation at Plains Site." Paper 11.4, Fifth Symposium on Turbulence, Diffusion and Air Pollution, Atlanta, Georgia, March 1981.

Bowne, N.E., R. Londergan, D. Minott, D. Murray, "Preliminary Results from the EPRI Plume Model Validation Project - Plains Site." Electric Power Research Institute, EPRI EA-1788, April 1981.

Londergan, R.J., et al., "A Comparison of Predictions from Standard Short-Term Air Quality Models with Observed Tracer Dispersion." Paper 10.4, Second Joint Conference on Applications of Air Pollution Meteorology, New Orleans, LA, March 1980.

Birenzvige, A., R. Londergan, J. Mangano, and D. Mage, "Methodology for Estimation of Individual Exposure to Air Pollutants," Technical Paper 80-61.4, APCA Annual Meeting.

Londergan, R.J., "Validation of Plume Models - Statistical Methods and Criteria," Report EA-1673-SY, Electric Power Research Institute, November 1980.

Londergan, R.J., "Protocol for Plume Model Validation," Report EA-1638, Electric Power Research Institute, November 1980.

Londergan, R.J., et al., "An Evaluation of Short-Term Air Quality Models Using Tracer Study Data." American Petroleum Institute, API Report No. 4333, October 1980.

Hilst, G.R., R. Londergan, T. Hopper, 1977: "Time-Variable Air Pollutant Emissions Strategies for Individual Power Plants." Report EA-418, Electric Power Research Institute, April 1977.

EMPLOYMENT HISTORY

05/1995 - present, Earth Tech
07/1991 - 05/1995, ENSR, Senior Program Manager
09/1974 - 06/1991, TRC, Vice President/Chief Scientist

PREFILED TESTIMONY OF ROBERT J. GOLDEN, Jr.

Q. Please state your name, title, and business address.

A. Robert J. Golden, Jr.
Vice President
TRC Environmental Corporation
1200 Wall Street West
Lyndhurst, NJ 07071

Q. Please describe your current responsibilities and professional experience.

A. I am presently a Vice President of TRC Environmental Corporation and I am the Practice Leader for the Energy Facility Licensing Group work efforts for the Company. I am presently the Project Manager of environmental permitting work efforts for a number of simple cycle and combined cycle gas turbine projects, as well as waste-coal fired and wind energy generation projects, in the Northeast and Mid-Atlantic Region. A more detailed summary is provided in my resume which is attached hereto.

Q. Have you ever appeared as a witness before any regulatory agency?

A. Over the last eighteen (18) years of my professional career, I have appeared as a witness or submitted testimony to various regulatory agencies as part of the environmental licensing work efforts for numerous electric generation as well as electric substation/transmission facilities. I have served as a witness or submitted testimony in proceedings before the New Jersey Department of Environmental Protection's Land Use Regulation Program; the New York Public Service

EXHIBIT 6

Commission, as well as before numerous Municipal Board of Supervisors/Municipal Planning Boards and/or Municipal Zoning Commissions.

Q. What has been your involvement in this project?

A. I am the Project Manager for TRC's work efforts that have been authorized by LS Power Development, LLC to support the environmental permitting of the Bridgeport Energy II, LLC Project. This has included the supervision of the preparation of the Coastal Site Plan Review Application's Support Document for the Bridgeport Peaking Station as well as miscellaneous environmental support services related to environmental site assessment documentation and wastewater permit application preparation assistance.

Q. Were you involved in the preparation of the Petition?

A. Yes. I was involved with and supervised the preparation of the "Coastal Site Plan Review Application Support Document for the Bridgeport Peaking Station" (Exhibit G to the Petition). I also supervised the preparation of correspondence sent to the State of Connecticut's Department of Environmental Protection regarding the presence of populations of Federal or State Endangered, Threatened or Special Concern Species at the Project site. (The State of Connecticut Department of Environmental Protection Natural Diversity Database letter to Mr. Kevin Maher, TRC, dated December 28, 2007 is Petitioner's Exhibit 8.)

Q. Were you also responsible for answering any pre-hearing interrogatories?

A. No.

Q. Are you prepared to address those sections of the Petition that were prepared under your supervision and control?

A. Yes.

Q. Is the information presented in the portions of the Petition and in the Answers to the Prehearing Interrogatories for which you are responsible true and correct to the best of your knowledge and belief?

A. Yes.

Q. At this time, are there any additions or corrections to those sections of the Petition you reference earlier?

A. No.

Q. Are there aspects of the Petition that merit special focus by the Siting Council?

A. Yes. While the project is located within 1,000 feet of the high tide line in Bridgeport Harbor, placing it under the jurisdiction of the Coastal Management Act, the project will have no adverse impacts on coastal resources in the area. There is no evidence of any coastal resources on or adjacent to the proposed project site. The project site location is on a parcel of land physically isolated from the shore and is part of a larger area that has been dedicated to generation of

electricity for decades. Additionally, the project site is not located on the waterfront and therefore would not preclude the future development of waterfront-dependent uses within the coastal zone. The project is, accordingly, consistent with the policies set forth in the Coastal Management Act.

Q. Does this conclude your testimony?

A. Yes.

TRC

ROBERT J. GOLDEN JR.

EDUCATION

M.S., Management, Marine Resources Management Specialization, Texas A&M University, 1978
B.S., Environmental Science, Cook College, Rutgers University, 1974

TECHNICAL SPECIALTIES

Mr. Golden has 28 years of experience encompassing:

- Project Management
- Multi-Media Environmental Permitting
- Regulatory Review/Fatal Flow Analysis
- Environmental Due Diligence Reviews/Assessments
- Environmental Impact Studies/Assessments
- Expert Testimony

REPRESENTATIVE EXPERIENCE

Mr. Golden has over 28 years of experience as a Project Manager and Multi-Media Permitting Specialist on a variety of energy development/facility siting projects as well as pharmaceutical, healthcare and industrial projects. Mr. Golden has prepared and supervised the development of permitting strategies as they relate to the development, construction and/or operation of each project and served as the Project Manager responsible for obtaining all required environmental permits and plan approvals/certifications. Mr. Golden has extensive experience at managing multidisciplinary technical staff and project team members/subcontractors under strict budget and/or schedule constraints while interacting with/responding to various regulatory approval agencies.

Power Generation

River Hill Power Company, LLC, 290 MW Waste Coal Fired Power Plant Project – Karthaus Township, Clearfield County, PA (Project Manager: 2002 – Present)

Mr. Golden serves as the Project Manager for total environmental permitting of a 290 MW CFB waste coal fired power plant in Karthaus Township, Clearfield County, Pennsylvania. Responsibilities have included preparation and/or coordination of PSD air permit and air permit amendment; SRBC water allocation; railroad crossing and occupancy approvals; NPDES Industrial and Sanitary approvals; PENNDOT HOP approvals; County Conservation District Soil Erosion and Sedimentation Control approvals; PaDEP Waterways Obstruction and Encroachment approvals; Township Supervisor Land Development and Subdivision Plans; USACOE wetlands jurisdictional determination; threatened and endangered species and Pennsylvania Historical & Museum Commission clearances; FAA approvals and Phase I ASTM site assessments. Work efforts also included preparation/administration of two Pennsylvania Energy Harvest

Grants, a PEDFA tax exempt bond application and environmental components of the EPC Bid Specification. Current work efforts include providing financial closing assistance; ongoing permit maintenance/compliance assistance and working with the EPCM Contractor to obtain construction – related permits/approvals.

SG Somerset Power, LLC, 300 MW Waste Coal Fired Power Plant Facility – Shade Township, Somerset County, PA (Project Manager: 2006 – Present)
Mr. Golden serves as the Project Manager responsible for the coordination/preparation of all required environmental approvals at the Federal, State, Regional and Municipal levels for a 300 MW, waste coal fired power plant project as well as the required electric transmission line interconnection.

Confidential Client, Fatal Flaw/Licensing Assessment for Proposed 600 MW Combined Cycle Facility – Central NJ (Project Manager: Present)
Mr. Golden serves as Project Manager for the preparation of a Fatal Flaw/Licensing Analysis for a dual fuel, combined cycle facility proposed to be developed in Central New Jersey. TRC's work scope includes the identification of risks/issues and significant areas of concern relative to the planned project; the preparation of a licensing/permitting strategy and schedule; and the preparation of a Phase I Environmental Site Assessment prepared in accordance with ASTM Standard E 1527-05.

AES Ironwood, LLC, Environmental Permitting/Compliance Assistance – South Lebanon Township, Lebanon County, PA (Project Manager: 2002 – Present)
Mr. Golden has worked on and/or coordinated the preparation of various permit applications/submittals as well as provided environmental compliance assistance, as necessary, since the facility became operational. Work activities on the project have included preparation of an updated Spill Prevention Response (SPR) Plan; a Title V application; a modification application to the Susquehanna River Basin Commission; and an EPA Risk Management Program (RMP) Manual. Mr. Golden has also provided compliance support to AES relative to various third party and/or Corporate Environmental, Health and Safety Audits performed at the Facility.

Consolidated Edison Development Operating Company, LLC, Environmental Consulting/Permitting Assistance – Lakewood Township, Ocean County, NJ (Project Manager: 2002 – Present)
Mr. Golden has served as Project Manager to CED Operating Company, LLC for the 500 MW Ocean Peaking Power (OPP) facility as well as the 236 MW Lakewood Cogeneration, L.P (LCLP) facility that are located in Lakewood Township, New Jersey and the Rock Springs Generation Facility in Rising Sun, Maryland. Work efforts have included preparation of a Discharge Prevention Containment Countermeasure/Discharge Cleanup and Removal (DPCC/DCR) Plan Renewal for LCLP; SPCC Plans for OPP and Rock Springs facilities;

Stormwater Pollution Prevention Plans for OPP; various air permit amendments for OPP; and Phase I ESA Reports for all three facilities.

AES Ironwood, LLC, Total Environmental Permitting for 700 MW Gas Turbine Power Generation Facility – South Lebanon Township, PA (Project Manager: 1998 – 2002)

Mr. Golden served as Project Manager for total environmental permitting of a 700 MW combined cycle natural gas fired power facility. He managed preparation of extensive groundwater and surface water impact studies related to water supply alternatives and coordinated preparation of a comprehensive water allocation application, which was submitted to and approved by the Susquehanna and Delaware River Basin Commissions (SRBC and DRBC, respectively) and the Pennsylvania Fish and Boat Commission. Mr. Golden attended numerous meetings with SRBC and DRBC staff and local environmental and special interest groups. He coordinated the local land development approval process and coordinated efforts of AES's in-house engineering consultant and local architect/engineering firm with the Township and County Planning Boards and the South Lebanon Township Board of Supervisors. Additional tasks which Mr. Golden managed for the project included coordinating noise monitoring and modeling studies; the preparation of PENNDOT application and Phase I Site Assessment studies; and the preparation of miscellaneous permit application such as FUA certification, FAA, and four (4) state General Permit applications; and a zoning hearing board application for variance request for the construction of a meteorological monitoring tower and for a stack height variance. Mr. Golden coordinated the permitting effort of other project consultants; served as liaison with EPC construction contractor and provided environmental documentation during the financial closing process. During facility construction and commercial operation, Mr. Golden managed work efforts that involved preparation of Site Specific Installation Permit, an Operational Stormwater Permit Application, a Title V permit application and PSD air permit modification to address start-up/shutdown issues and new emission sources as well as DRBC/SRBC permit compliance documentation.

Liberty Electric Power, LLC, Total Environmental Permitting for 500 MW Gas Turbine Power Generation Facility, Borough of Eddystone, Delaware County, PA (Project Manager)

Mr. Golden served as Project Manager for total environmental permitting of a 500 MW natural gas fired combined cycle electric generating facility. He prepared and/or coordinated the preparation of all required federal, state and/or local approvals, including the municipal land development approval; the Delaware River Basin Commission approval; the DELCORA wastewater discharge approval; the FAA and PENNDOT Bureau of Aviation determinations and FUA certification; Pennsylvania CZM approval; the PENNDOT application; the USACOE wetlands presence/absence jurisdictional determination; and threatened and endangered species and Pennsylvania Historic Museum commission clearances. Work efforts performed during facility construction

involved managing/coordinating the review of required air quality CEMS and emissions testing protocols and compliance documentation. During commercial operation work efforts have included obtaining PaDEP General Stormawater Permit Associated with Industrial activities as well as the preparation of PaDEP storage tank registration for affected tanks. The Facility is constructed and operational.

Reliant Energy Hunterstown, LLC, Environmental Permitting and Regulatory Review for 800 MW Power Generation Facility, Straban Township, Adams County, PA (Project Manager)
Mr. Golden served as Project Manager of the permitting effort for a 800 MW natural gas fired power generation facility developed by Reliant Energy. He prepared and/or coordinated the preparation of the PSD air permit; the FAA and PENNDOT Bureau of Aviation approvals; FUA certification; a wetlands jurisdictional determination; formal approvals of the Pennsylvania Game Commission, Pennsylvania Fish and Boat Commission, Pennsylvania Department of Conservation and Natural Resources and U.S. Fish and Wildlife Service relative to no threatened and/or endangered species impacts; a Phase I archaeological survey; a local EIS for Straban Township conditional Land Use approval; and provided wastewater/NPDES Part I and II permitting assistance. The facility is constructed and operational.

AES Red Oak, LLC., Total Environmental Permitting for 816 MW Gas Turbine Power Generation Facility – Sayreville, NJ (Project Manager)
Mr. Golden served as Project Manager responsible for obtaining all environmental permits/approvals for a 816 MW dispatchable, natural gas fired power generation facility in Sayreville, New Jersey. He prepared and/or coordinated the preparation of the PSD air permit; Sayreville Planning Board EIS and land development submittal; wetlands delineation; FAA application; FUA certification; Conrail crossing and Occupancy permit applications; Treatment Works approval and Potable Water Line application; Middlesex County Utilities Authority industrial wastewater discharge application; Middlesex County Planning Board application; and performance of an environmental baseline (soil and groundwater) investigation/report preparation. He also provided environmental compliance assistance as part of financial closing as well as guidance/liaison with the EPC Contractor as to regulatory permitting compliance obligations. Additional efforts during construction and commercial operation have included preparation/coordination of PSD/air permit modification for new emission sources and Title V application as well as ongoing air quality compliance assistance; MCUA Wastewater renewal application; and the preparation of Discharge Prevention Containment and Countermeasure/Discharge Cleanup Removal (DPCC/DCR) Plan and Stormwater Pollution Prevention Plans for the facility.

Ocean Peaking Power, L.P., Environmental Permitting for a 500 MW Gas Turbine Peaking Facility – Lakewood, NJ (Project Manager)
Mr. Golden served as Project Manager and was responsible for the environmental permitting efforts associated with the development of a 500 MW natural gas fired simple cycle peaking generating facility developed by Consolidated Edison Development, Inc. in Lakewood Township, Ocean County, New Jersey. Responsibilities included preparation and/or coordination of the preparation of the PSD/State air permit application; the coastal Area Facilities Review Act (CAFRA) application; FAA application; and the provision of expert witness testimony during Lakewood Township planning board public hearings to obtain this approval. Additional work efforts during construction/operation of the facility, which Mr. Golden managed included the preparation of a Spill Control Countermeasure and Control Plan, a Stormwater Pollution Prevention Plan as part of the facility's General Stormwater Operational Permit, and supervising the preparation of CEMS equipment protocol as well as CEMS and Emissions Compliance testing protocols. The facility is constructed and operational.

Calpine Newark, LLC., Ongoing Environmental Permitting/Compliance Assistance – Newark, NJ
Mr. Golden has served as Project Manager and has been responsible for preparing/coordinating wastewater discharge permit renewal application to Passaic Valley Sewerage Commission; DPCC/DCR Plan amendment and Plan renewal applications; NJDEP laboratory certification; Annual Facility Right-to-Know reports and the facility's SPPP Plan Update. Work also involved compilation of an environmental permits/reports binder and matrix; providing training on DPCC/DCR and SPPP requirements to facility operational staff; permit transfer/agency notification assistance, and regulatory agency inspection/compliance documentation assistance

Calpine Parlin, LLC., Ongoing Environmental Permitting/Compliance Assistance – Sayreville, NJ
Mr. Golden has served as Project Manager to Calpine Parlin and has been responsible for the preparation/coordination of DPCC/DCR Plan amendment and Plan renewals; the facility's NJDEP laboratory certification; and environmental permits compliance documentation and development of Environmental Standard Operating Procedures (SOPS). Additional services have included providing training on the facility's DPCC/DCR plan; providing permit transfer/agency notification assistance and updating the facility's CEMS QA/QC Plan.

Inn COGEN, Complete Environmental Permitting/Coordination for a 225 MW Limited, Gas Turbine Power Plant facility – Couva, Trinidad (Project Manager)
Mr. Golden served as Project Manager and the technical lead responsible for obtaining the required environmental permits for a 225 MW natural gas fired power plant project in Couva, Trinidad and Tobago. Responsibilities included preparation of an Outline Plan Approval Application and submittal to the Ministry

of Planning and Development's Town and Country Planning Division (TCPD) which was approved. He coordinated as well as participated in the preparation of an environmental impact statement which was submitted to TCPD and approved. Work efforts also included preparation of 5 compliance plans reflecting obtaining approvals from various agencies including Environmental Management Agency, Ministry of Energy and Energy Industries; and Water and Sewerage Authority to satisfy Notice of Grant of Outline Planning Permission. The facility was constructed and is presently operational.

Electric Transmission Projects

River Hill Power Company, LLC, 230 kV Electrical Transmission Line and Interconnection Substation Project – Karthaus Township, Clearfield County, PA (Project Manager: 2005 – Present)
Mr. Golden served as Project Manager and was responsible for obtaining the required environmental permits approvals for this project. Work efforts included obtaining Township approval of Preliminary/Final Land Development and Subdivision Approvals; supervising wetlands delineation and threatened/endangered species investigations; and obtaining NPDES Amendment for Soil Erosion and Sedimentation Control Plans for the transmission line and a PaDEP Waterways Obstruction and Encroachment Permit Waiver.

Consolidated Edison Company of New York, Inc., 138 kV Grasslands Transmission Lines and Substation – Westchester County, NY (Principal-In-Charge: 2002 – 2003)
Mr. Golden served as Principal-In-Charge and assisted the Project Manager as necessary with the preparation of an Article VII application for up to five underground transmission lines along two routes and a new 138/13 kV area substation in Westchester County. The project involved coordination with the NYS Department of Transportation, the NYC Department of Environmental Protection, Water Supply Bureau and the Westchester County Department of Public Works, as well as county and township officials, to advance the project under a non-contested Article VII proceeding. Additional approvals obtained for the project included obtaining a Highway Work Permit for Crossing Route 9A and Route 100C; a NYSDOT permit to conduct a geotechnical boring program; a NYCDEP permit to cross the Catskill Aquaduct; and a U.S. Army Corps of Engineers Nationwide Permit #12 to cross the Saw Mill River. TRC also prepared and obtained NYSPSC approval of the EM&CP plans for both the transmission lines and the Grasslands Substation.

Consolidated Edison Company of New York, Inc. Substation Improvements and Modernization of White Plains Substation – White Plains, NY (Project Manager: 2000 – 2002)
Mr. Golden served as Project Manager and was responsible for obtaining New York State Environmental Quality Review Act (SEQR) approval and City of White

Plains Planning Board approval for the proposed improvement and modernization of Consolidated Edison of New York's White Plains Substation. The project's SEQR documentation prepared addressed potential environmental impacts/issues associated with the placement of 138-kV transmission and 13-kV distribution lines within major roadways in the City of White Plains downtown core area; the potential for subsurface soil or groundwater contamination associated with a former manufactured gas plant at the site; and stormwater management issues.

SELECTED PUBLICATIONS

Golden, Jr., R.J., "Environmental Permitting for New Electric Capacity: The Need for an Innovative and Comprehensive Approach", presented at Association of Energy Engineers 1990 West Coast Congress Cogeneration Project Development Session, Santa Clara, California, March 30, 1990. Paper printed in Cogeneration Journal, Volume 5, #3, Summer 1990 issue.

Golden, Jr., R.J., "The Need to Comprehensively and Innovatively Approach Environmental Permitting for Technical Session – Environmental Factors Impacting Cogeneration and Independent Power Development at 1989 Cogeneration and Independent Power Congress," Atlantic City, New Jersey, June 7-8, 1989.

Golden, Jr., R.J. and B.H. Hoff, "Strategy Development for Accommodating an OCS Natural Gas Pipeline: New Jersey's Experience", Proceedings of the Conference on Joint Usage of Utility and Transportation Corridors sponsored by the Pipeline Division of the American Society of Civil Engineers, September 24-25, 1981 edited by C.H. Keohn, pp. 32-42, Houston, Texas.

Golden, Jr., R.J., K. Gallagher, N.P. Psuty, B.H. Hoff and E.J. Linky, March 1980. "OCS Pipelines: An Analysis of Routing Issues", a technical report by the Center for Coastal an Environmental Studies, Rutgers University and the New Jersey Department of Energy, 432 pages.

Psuty, N.P., R.J. Golden, Jr., K. Gallagher, B.H. Hoff and E.J. Linky. "Pipeline Landfall: Strategy Development Accommodating Natural Gas Production in the Baltimore Canyon Trough", Proceedings, Fifth Annual Coastal Society Conference, Newport, Rhode Island, November, 1979.

PREFILED TESTIMONY OF ANDREW DEGON

Q. Please state your name, title, and business address.

A. Andrew Degon
Project Engineer
Two Tower Center, 11th Floor
East Brunswick, NJ 08816

Q. Please describe your current responsibilities and professional experience.

A. I am presently a Project Engineer in the Engineering & Construction group of LS Power Development. My current responsibilities include the general oversight of technical development activities relating to specific projects, including permitting support, site plans, and construction contracts. Previously, I spent several years with R.W. Beck as an Owner's Engineer supporting the development of Greenfield power plants and as an Independent Engineer supporting the financing of various power projects.

Q. What is your educational background?

A. I graduated from Rutgers University with a B.S. in Mechanical Engineering.

Q. Have you ever appeared as a witness before any regulatory agency?

A. No.

Q. What has been your involvement in this project?

A. I have been responsible for the general oversight of technical development activities relating to the Project, including performance estimating, equipment

EXHIBIT 7

evaluation and selection, permitting support, and coordination of engineering and technical consultants responsible for the development of site layouts, stormwater drainage and landscaping plans, and other technical feasibility studies.

Q. Were you involved in the preparation of the Petition?

A. Yes. I was involved with the portions of the Petition relating to water resource impacts of the proposed peaking facility and the stormwater and drainage analysis.

Q. Were you also responsible for answering any pre-hearing interrogatories?

A. No.

Q. Are you prepared to address those sections of the Petition that were prepared under your supervision and control?

A. Yes.

Q. Is the information presented in the portions of the Petition and in the Answers to the Prehearing Interrogatories for which you are responsible true and correct to the best of your knowledge and belief?

A. Yes.

Q. At this time, are there any additions or corrections to those sections of the Petition you reference earlier?

A. A number of changes were made to the site plan based on comments received from the Planning & Zoning Hearing held on January 28, 2008. The majority of the changes were made to accommodate increased landscaping along the western and southern edges of the property and to reduce the size of the fuel oil storage tank from 1.2 million gallons to 800,000 gallons. Additionally, minor changes were made to incorporate newly obtained details on sizing of ancillary equipment. The General Arrangement Plan, Landscaping Plan, Grading & Drainage Plan ("Revised Site Plans") have all been updated to reflect these changes and are submitted as Petitioner's Exhibit 15. The Site Renderings have also been updated and are submitted as Petitioner's Exhibit 17. The revised Grading & Drainage Plan will be resubmitted to the Bridgeport Water Pollution Control Authority for its review.

Q. Does this conclude your testimony?

A. Yes.

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

December 28, 2007

Mr. Kevin Maher
TRC
1200 Wall Street West
2nd Floor
Lyndhurst, NJ 07071

Re: Bridgeport Peaking Station
Bridgeport Energy II, LLC, Bridgeport

Dear Mr. Maher:

I have reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed Bridgeport Peaking Station on the intersections of Henry and Russell Streets in Bridgeport, Connecticut. According to our information there are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species that occur at the site in question.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Natural Resources Center's Geological and Natural History Survey and cooperating units of DEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.

Please contact me if you have further questions at 424-3592. Thank you for consulting the Natural Diversity Data Base. Also be advised thatthis is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEP for the proposed site.

Sincerely,

Dawn M. McKay
Biologist/Environmental Analyst

DMM/blm

EXHIBIT 8

City of Bridgeport
Zoning Department
PLANNING & ECONOMIC DEVELOPMENT
45 Lyon Terrace • Bridgeport, Connecticut 06604
Telephone (203) 576-7217
Fax (203) 576-7213

DATE: January 31, 2008

OUR FILE: # 07 – 122

Attorney John F. Fallon
Owens, Schine & Nicola, P.C.
53 Sherman Street
Fairfield, CT 06824

RE: Coastal Site Plan Review
10 Atlantic Street
Bridgeport, CT

Dear Attorney Fallon:

At its Public Hearing held on Monday, January 28, 2008 the Planning & Zoning Commission voted to approve conditionally the application submitted by you on behalf of your client, Bridgeport Energy, LLC seeking a Coastal Site Plan Review pursuant to Sec. 14-3 to construct an electric power generation facility in an I-LI ZONE.

The Commission stipulated the following condition for its approval:

1. That additional trees as large as practical shall be planted in all areas of the site.
2. That the landscaping area around the storage tank shall be enlarged in proposition to the size reduction in the tank when reduced from 1.2 mil gals. to 800,000 gallons.
3. Street trees shall be planted (one every 25 feet) along both sides of the street.
4. It is recommended that this facility not be expanded in the future.

The Commission's decision is based on the following reasons:

1. As conditioned this project will have no unacceptable adverse impacts on the Coastal Area.

Very truly yours,

William E. Minor, Clerk
Planning & Zoning Commission

WEM:map

EXHIBIT 9

South End Neighborhood Council

37 Forest Court
Bridgeport, CT 06604
384-9742

January 28, 2008

Planning and Zoning Commission
City of Bridgeport
45 Lyon Terrace
Bridgeport, CT 06604

Re: 10 Atlantic Street

Dear Commissioners,

In early fall of 2007, at a meeting on the University of Bridgeport's campus, Bridgeport Energy II presented to the South End community a proposal for a peak demand generation facility to be located adjacent to the existing generation facility. Concern was raised with the height of the stacks and it was pointed out that the existing facility has a lower profile. Evidently because of regulatory requirements there is no adjustment possible on the height.

The Council understands that the city will benefit from additional tax revenue and the community would like a portion of the monies to go toward street and streetscape improvements in the South End. The Council would like at this time to request from Bridgeport Energy a modest annual donation to cover administrative and notification costs.

In closing, the South End Neighborhood Council is in support of Bridgeport Energy II's petition to build a new peak period generation facility in the South End.

Thank you,

Greg Breland
Vice-President
SENC

EXHIBIT 10

Updated Plot Plan – Poster size
(One poster size exhibit available at public hearing only)

EXHIBIT 11

Site Renderings – Poster size
(One poster size exhibit available at public hearing only)

EXHIBIT 12

VIEWSHED ANALYSIS

Tall buildings, heavy tree cover and other structures will serve to screen the Bridgeport Peaking Facility from much of the surrounding community. The primary components of the proposed facility include the turbine building (80 feet tall), the fuel oil storage tank (40 feet tall) and the exhaust stacks (213 feet tall). A visibility analysis that considers tree cover, buildings and other structures that would be expected to obscure the view of the stacks and other components from a ground level observer is presented in the Viewshed Map, which shows areas within a one mile radius from which the project stacks may be visible. The analysis was prepared using high resolution, oblique aerial imagery to identify areas in which heavy tree cover and close proximity buildings would obscure views of the stacks from surrounding vantage points. Even though the stacks may be visible from a long distance, in many areas of the view shed, an observer may only see a small portion of the top of the stack. Further, the view shed map does not consider the screening to be provided by the proposed 60 Main Street development, which would further obscure views from the south.

The views of the proposed exhaust stacks from Russell Street, the corner of Main Street and Atlantic Street, and from the corner of Main Street and Henry Street are shown in the Site Renderings, Attachment E to the Petition. 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, so they will not as visible as that stack at more distant locations.

EXHIBIT 13

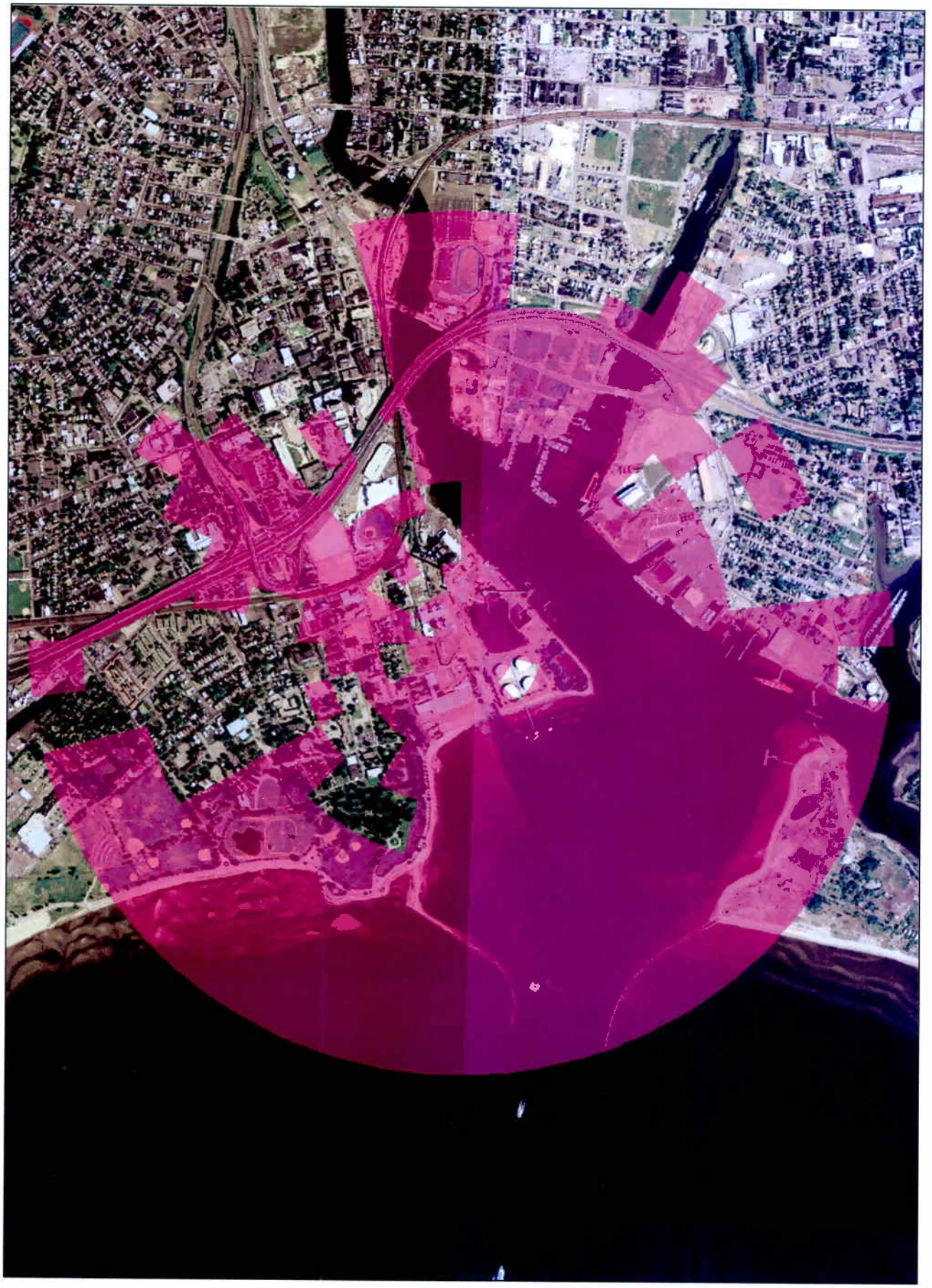


Exhibit 13

Bridgeport II Stacks Viewshed Map

N
W E
S

Areas shaded pink are areas in which a ground observer would likely be within the viewshed of the 213' Bridgeport II stacks. Analysis was limited to a one mile radius.

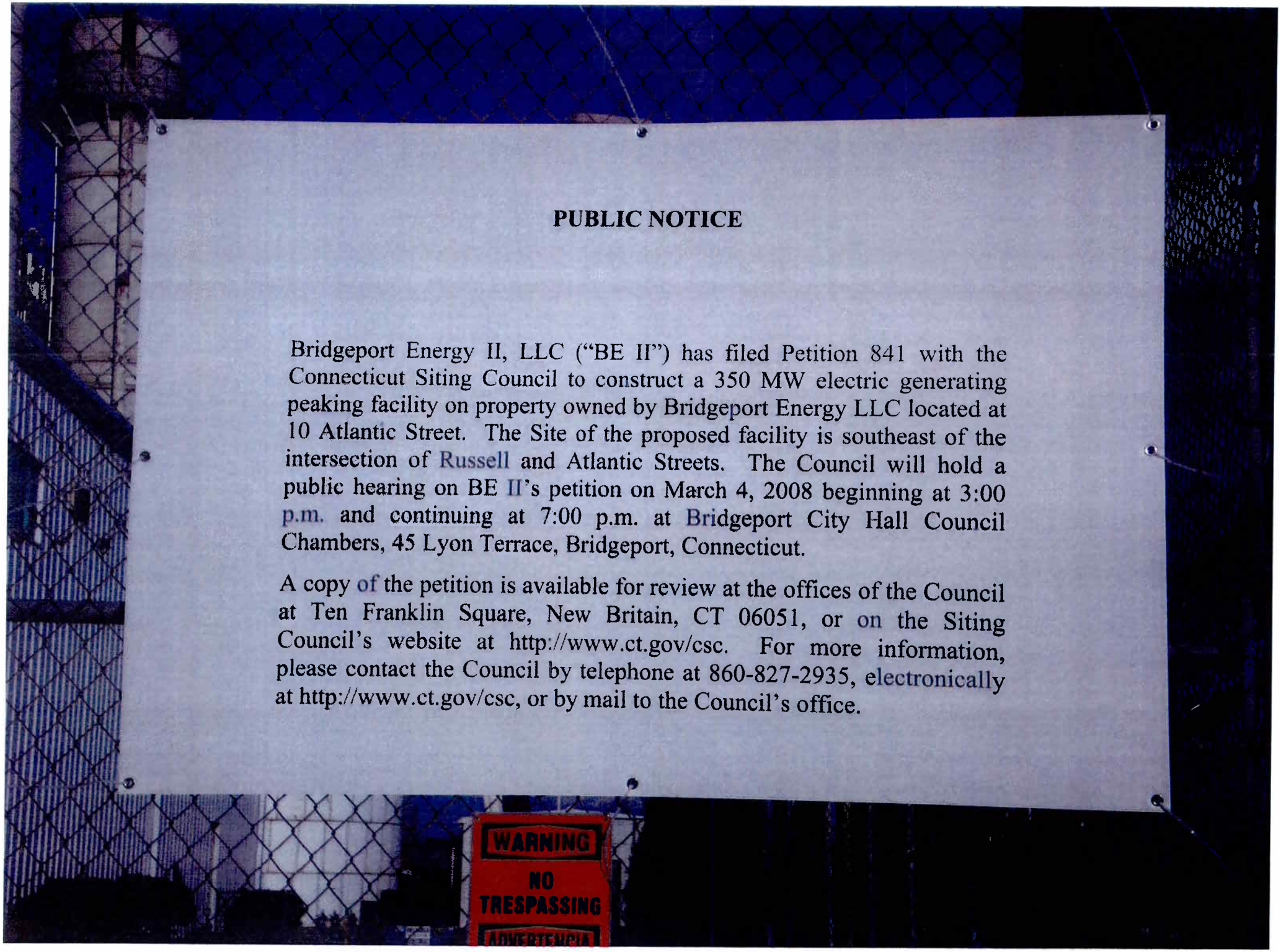
0 1,000 2,000 4,000

Feet


First Sign- BE Property
10 Atlantic St, Bridgeport, CT 06604
Second Sign- UI Property
Henry Street
© 2008 Europa Technologies
Image © 2008 DigitalGlobe
© 2008 Tele Atlas
Google
Pointer 41°10'05.91" N 73°11'06.03" W elev 10 ft Streaming 100%

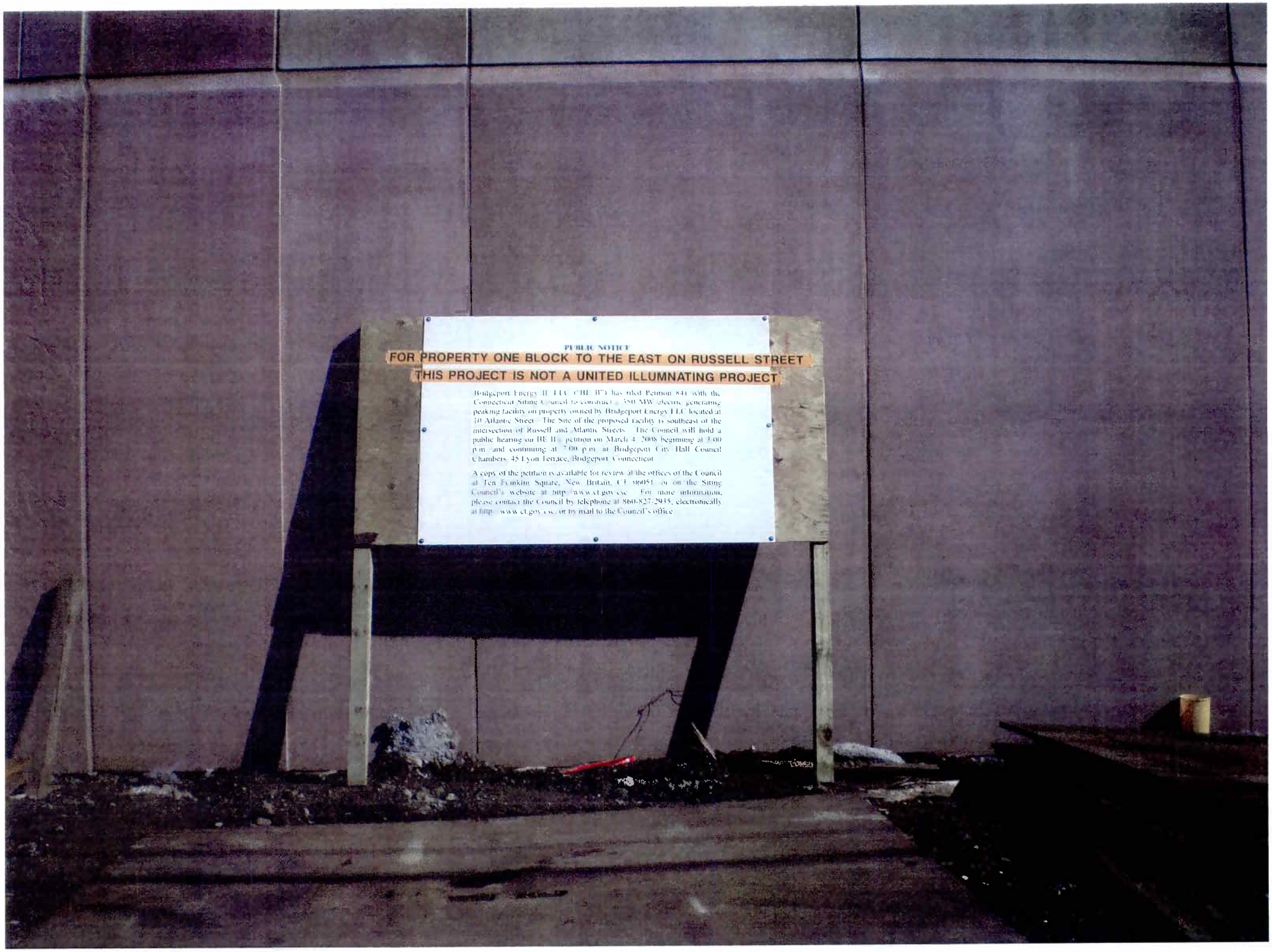
EXHIBIT 14


HANDY HOUSE
15


PUBLIC NOTICE
Bridgeport Energy II, LLC ("BE II") has filed Petition 841 with the Connecticut Siting Council to construct a 350 MW electric generating peaking facility on property owned by Bridgeport Energy LLC located at 10 Atlantic Street. The Site of the proposed facility is southeast of the intersection of Russell and Atlantic Streets. The Council will hold a public hearing on BE II's petition on March 4, 2008 beginning at 3:00 p.m. and continuing at 7:00 p.m. at Bridgeport City Hall Council Chambers, 45 Lyon Terrace, Bridgeport, Connecticut.
A copy of the petition is available for review at the offices of the Council at Ten Franklin Square, New Britain, CT 06051, or on the Siting Council's website at http://www.ct.gov/csc. For more information, please contact the Council by telephone at 860-827-2935, electronically at http://www.ct.gov/csc, or by mail to the Council's office.
WARNING
NO
TRESPASSING
ADVERTENCIA


ONE WAY
STOP
Main St
Atlantic


FOR PROPERTY ONE BLOCK TO THE EAST ON RUSSELL STREET
THIS PROJECT IS NOT A UNITED ILLUMINATING PROJECT


PUBLIC NOTICE
FOR PROPERTY ONE BLOCK TO THE EAST ON RUSSELL STREET
THIS PROJECT IS NOT A UNITED ILLUMNATING PROJECT
Bridgeport Energy II LLC (BE II) has filed Petition 841 with the Connecticut Siting Council to construct a 560 MW electric generating peaking facility on property owned by Bridgeport Energy LLC located at 30 Atlantic Street. The Site of the proposed facility is southeast of the intersection of Russell and Atlantic Streets. The Council will hold a public hearing on BE II's petition on March 4, 2008 beginning at 3:00 p.m. and continuing at 7:00 p.m. at Bridgeport City Hall Council Chambers, 45 Lyon Terrace, Bridgeport, Connecticut.
A copy of the petition is available for review at the offices of the Council at Ten Franklin Square, New Britain, CT 06051 or on the Siting Council's website at http://www.ct.gov/csc. For more information, please contact the Council by telephone at 860-827-2935, electronically at http://www.ct.gov/csc, or by mail to the Council's office.

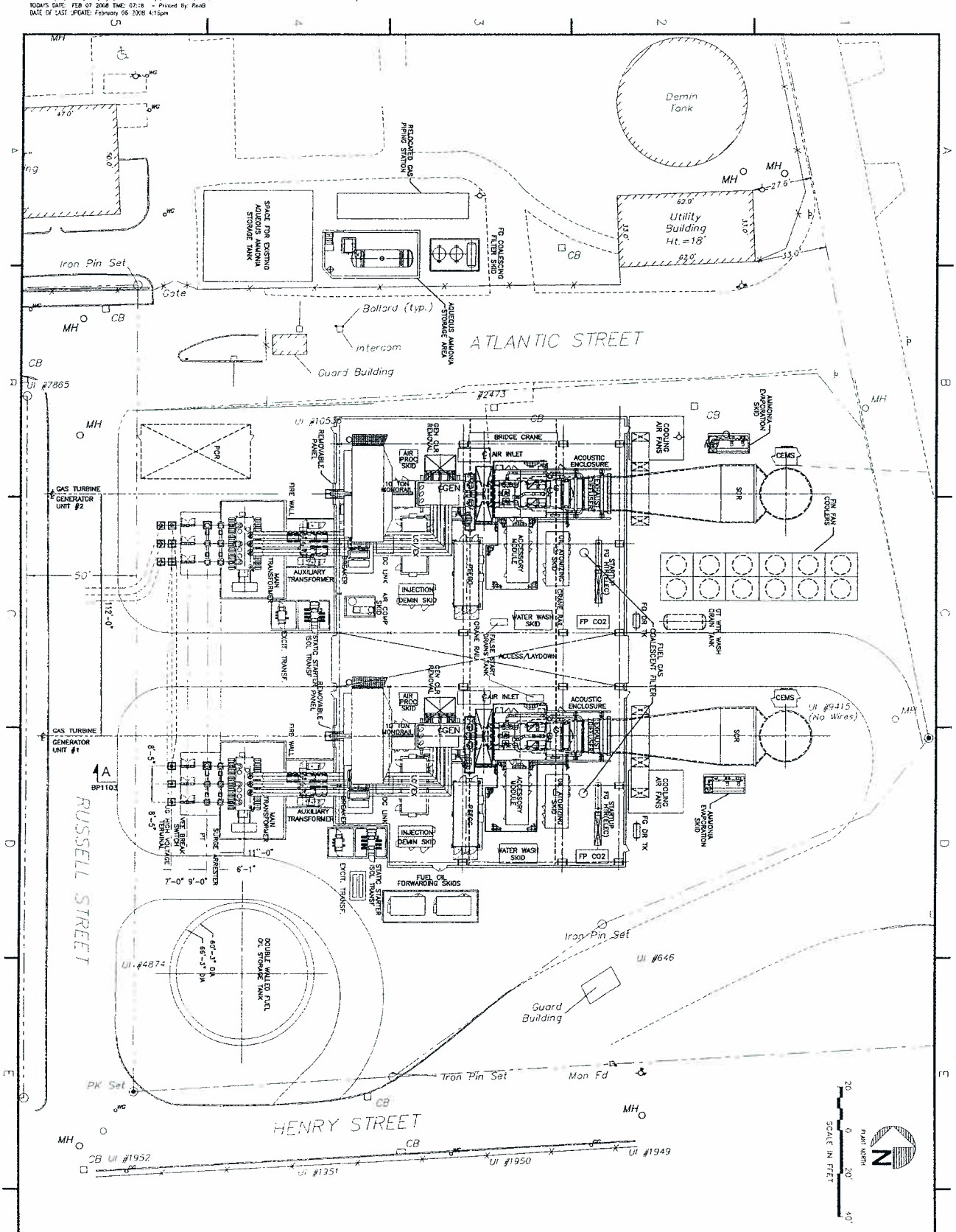

Demin Tank
Utility Building Ht.=18'
ATLANTIC STREET
Guard Building
Bollard (typ.)
Intercom
Iron Pin Set
Gate
SPACE FOR EXISTING AQUEOUS AMMONIA STORAGE TANK
FG COALESCING FILTER SKID
AQUEOUS AMMONIA STORAGE AREA
GAS TURBINE GENERATOR UNIT #2
GAS TURBINE GENERATOR UNIT #1
BRIDGE CRANE
AIR INLET
ACOUSTIC ENCLOSURE
COOLING AIR FANS
AMMONIA EVAPORATION SKID
CEMS
SCR
AUXILIARY TRANSFORMER
MAIN TRANSFORMER
INJECTION DEMIN SKID
WATER WASH SKID
FP CO2
FUEL OIL FORWARDING SKIDS
DOUBLE WALLED FUEL OIL STORAGE TANK
RUSSELL STREET
HENRY STREET
Iron Pin Set
Mon Fd
Guard Building
SCALE IN FEET
PLANT NORTH
GENERAL NOTES:

EXHIBIT 15(a)

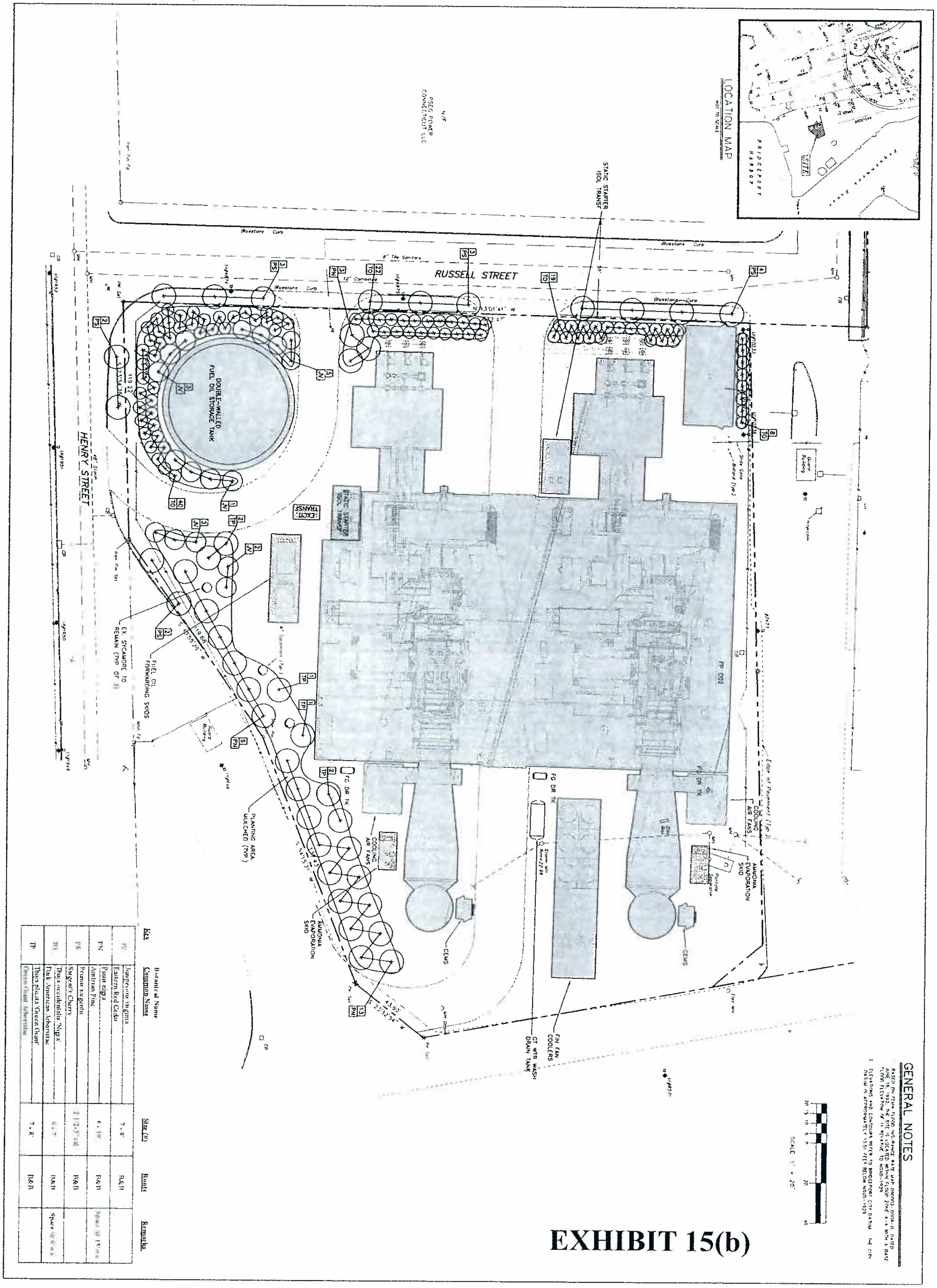


EXHIBIT 15(b)

DRAWING NUMBER	L-1
	BRIDGEPORT ENERGY II, LLC 10 ATLANTIC STREET BRIDGEPORT, CONNECTICUT
	PRELIMINARY LANDSCAPING PLAN
DESIGNER:	D.A.S.
DRAFTER:	D.A.S.
CHECKER:	
SCALE:	1"=20'
DATE:	12/12/07
TPA PROJ. NO.:	07-019

NO.	DATE	REMARKS
1	2/20/08	REVISED SITE PLAN

TPA DESIGN GROUP
Planning, Engineering, Landscape Architecture

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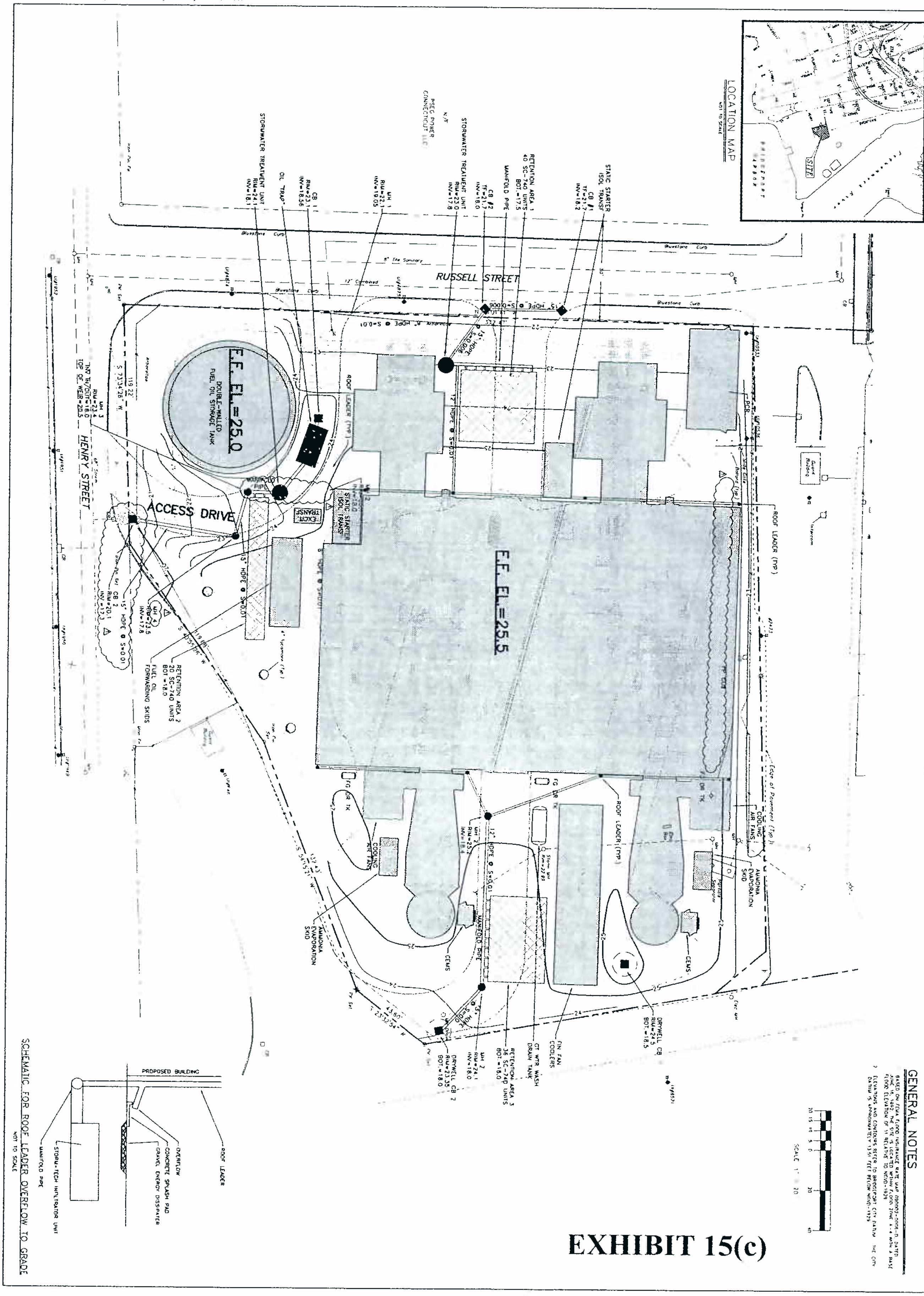


EXHIBIT 15(c)

BRIDGEPORT ENERGY II, LLC 10 ATLANTIC STREET BRIDGEPORT, CONNECTICUT	DESIGNER: D.A.S. DRAFTER: D.A.S. CHECKER: SCALE: 1"=20' DATE: 12/12/07 TPA PROJ. NO.: 07-019	REVISION: NO. 1 — 12/17/07 — WPCA COMMENTS NO. 2 — 2/20/08 — REVISED SITE PLAN	TPA DESIGN GROUP Planning, Engineering, Landscape Architecture
PRELIMINARY GRADING AND DRAINAGE PLAN			DRAWING NUMBER GD-1

Exhibit 16

Anticipated Fuel Truck Route Map from I-95 to Facility

N
W E
S

0 200 400 800

Feet

BRIDGEPORT PEAKING STATION
Bridgeport, Connecticut

VIEW FROM MAIN STREET AND HENRY STREET

EXHIBIT 17

BRIDGEPORT PEAKING STATION
Bridgeport, Connecticut

VIEW FROM MAIN STREET AND ATLANTIC STREET

BRIDGEPORT PEAKING STATION
Bridgeport, Connecticut

VIEW FROM RUSSELL STREET

February 21, 2008

Mr. David F. Caruso, Chairman
Connecticut Citing Council
10 Franklin Square
Hartford, CT 06051

BRIDGEPORT PORT AUTHORITY

RE: **Bridgeport Energy II, LLC Petition for Declaratory Ruling for 350 MW Peaking Plant, Petition, No. 841**

Dear Mr. Caruso:

The Bridgeport Port Authority (the "Port Authority") is a Connecticut Port Authority which has been duly established and organized pursuant to Section 329a of the Connecticut General Statutes (the "CGS") and the Bridgeport Municipal Code.

Section 7-239c of the CGS provides that the Port Authority shall have the power over the development and operation of Port Facilities within Port Authority District, as such terms are defined in Section 329b of the CGS (see attached).

The Port Authority understands that the Bridgeport Power Peaking Station (the "Station"), which will be a Port Facility in the Port District, will provide an increased substantial reliable supply of electric power in Southwestern Connecticut, including the Port District, when there is a significant electric generation capacity storage.

Because the operation of the Station will provide substantial reliable source of electric power to operators of businesses in the Port District, at the Regular Meeting of the Board of Commissioners of the Port Authority held February 12, 2008, the Board of Commissioners of the Port Authority approved the construction and operation of the Station, to be located at 10 Atlantic Street, Bridgeport, Connecticut. A supply of reliable electric power to businesses and users of the Port District is of important concern to the Port Authority to ensure that owners and operators of Port Facilities can rely on an adequate reliable source of power to conduct their operations in the Port District.

Sincerely,

Joseph A. Riccio, Jr.
Executive Director
BRIDGEPORT PORT AUTHORITY

350 Water Street
Bridgeport, CT 06604
203 381 9777
Fax 203 384 9686

EXHIBIT 18

Historical and Statutory Notes

Codification

Gen.St., Rev. to 2005, codified 2003, P.A. 03–256, § 1 as C.G.S.A. § 7–328c.

§ 7–329a. Establishment of port district and port authority. Jurisdiction

United States Code Annotated

Shipping, passenger vessels, ferries, definitions, see 46 U.S.C.A. § 2101.

§ 7–329b. Definitions

As used in sections 7–329a to 7–329u, inclusive:

(1) "District" means a port district established pursuant to section 7–329a, or if any such district is terminated, the entity accorded the powers and duties of sections 7–329a to 7–329u, inclusive;

(2) "Project" means the acquisition, purchase, construction, reconstruction, improvement or extension of a port facility;

(3) "Port authority" means the Bridgeport Port Authority, the New London Port Authority and the New Haven Port Authority created pursuant to sections 7–329a to 7–329u, inclusive, or if any such port authority is terminated, then the successor entity of such port authority accorded the powers and duties of said sections 7–329a to 7–329u, inclusive; and

(4) "Port facilities" means (A) wharves, docks, piers, vessels, air or bus terminals, railroad tracks or terminals, cold storage and refrigerating plants, warehouses, elevators, freight-handling machinery and such equipment as is used in the handling of freight, passengers and vessels, vehicles, and the establishment and operation of a port and any other works, vessels, vehicles, rolling stock, properties, buildings, structures or other facilities necessary or desirable for commerce and industry or waterfront development within a district or in connection with the development and operation of port facilities, or (B) manufacturing and industrial facilities, recreational and entertainment facilities, residential facilities or other commercial facilities necessary for commerce and industry or waterfront development within a district, and (C) located within or benefiting the district.

(1967, P.A. 900, § 2; 1998, P.A. 98–240, § 2; 2001, P.A. 01–143, § 7, eff. July 6, 2001; 2002, P.A. 02–42, § 1, eff. May 6, 2002.)

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

PETITION OF BRIDGEPORT ENERGY 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	:	PETITION NO. 841
	:	FEBRUARY 26, 2008

BRIDGEPORT ENERGY II, LLC'S RESPONSES TO INTERROGATORIES
OF 60 MAIN STREET LLC ET AL

Bridgeport Energy II, LLC ("BE II") hereby files this response to the Interrogatories received from 60 Main Street, LLC et al ("60 Main Street") on February 15, 2008. Each of the foregoing responses was prepared for BE II by Blake Wheatley.

Q1. What visual mitigation has the Applicant considered incorporating to make the facility more compatible with the renewal of this area, specifically the approved $700 million 1,200-unit waterfront residential development (breaking ground later this year) across the street from the facility? Please identify specifically what visual mitigation methods were considered, and if rejected, why.

A. BE II has considered and implemented a multitude of features that make it more compatible with the urban surroundings in general and the 60 Main Street development in particular. The proposed combustion turbine generators and associated ancillary equipment will be enclosed in a building that will shield its neighbors from the enclosed generating equipment. The new electric line that will connect the proposed peaking station with Singer Substation will also be located underground. Few peaking facilities in the United States incorporate such features. In addition, BE II has included substantial landscaping along the south and west sides of the proposed facility. BE II's most recent facility arrangement relocates the building and facility equipment to the north and east. BE II looks forward to working with the developers of the 60 Main Street project to design landscaping that will best utilize the newly freed up space in a manner most compatible with the proposed mixed use development. BE II is also willing to consider architectural or other artistic treatment of its building, fuel oil storage tank and exhaust stacks. BE II plans to work with the developers of the 60 Main Street project on these design elements as well.

Q2. Has the Applicant considered housing/enclosing all or a portion of the facility in a façade or false structure? If it has, please respond with the depictions of the structures

EXHIBIT 19

considered and an explanation of why this type of mitigation was accepted/rejected. If the Applicant has not considered doing so please address why it has not done so.

A. The building included in BE II's design has already been designed to enclose substantially more project equipment than comparable facilities constructed elsewhere in the United States and, therefore, encloses all project equipment that can reasonably be enclosed. This includes both combustion turbine generators and associated ancillary equipment. The most current depiction of the structures is included in Petitioner's Exhibit 15 ("Revised Site Plans").

Q3. Has the Applicant considered any alternatives to painting the facility using standard industrial painting scheme, i.e. in a creative, visually attractive or artistic fashion?

A. Yes, as noted above, BE II is willing to consider architectural or other artistic treatment of its building, fuel oil storage tank and exhaust stacks. BE II has offered to meet with the architect for 60 Main Street to discuss these design elements and looks forward to working with the developers of the 60 Main Street project in the future.

Q4. Has the Applicant considered environmentally-sensitive "green building" techniques, such as "green roofs" on top of the building and fuel tank, energy saving light fixtures, etc. Please identify what techniques were considered and accepted or rejected.

A. BE II has discussed with its engineers a roof design that would include plantings and/or other green features. Such a design is impractical for the Bridgeport Peaking Facility because the building roof must be capable of being disassembled in the future to allow access to the generating equipment within. Similarly, tank access prohibits the placement of green components atop the tank. BE II's final design will include a review of the feasibility of energy saving lighting consistent with safety and security considerations.

Q5. If the facility is operating on fuel rather than natural gas, when and how often will trucks be delivering fuel to re-supply that source? Please respond specifically by addressing the number of trips per day/week, time of day, day of week, etc.

A. Any estimate of anticipated operation of the proposed facility, whether using natural gas or its backup fuel supply, should consider that new peaking capacity is needed most in the State of Connecticut to satisfy a shortfall of reserve capacity, which is the capability to start up and generate electricity following an unanticipated failure of another generating unit, following a critical transmission outage or in periods of very high electric demand. Such reserves can not be provided if the peaking facility is operating. For this reason, and the fact that simple cycle units such as the proposed facility are inherently less efficient and more costly to operate than combined cycle units such as the Bridgeport Energy Station, anticipated operation is low, most likely less than 1,000 hours per year on any fuel and in no event more than 500 hours per year on distillate fuel oil.

Ultra low sulfur fuel oil is the back-up fuel supply for the proposed facility and will only be used during periods when natural gas can not reasonably be obtained. Pipeline companies typically curtail the supply of natural gas for facilities such as the Bridgeport Peaking Station during the coldest days of winter to enable the continued service of home heating loads. A typical anticipated profile of fuel oil use would be one or two 4-6 hour runs over a period of 3-5 consecutive very cold days. Two daily runs might be necessary to cover both the morning peak (6 – 10 am) and the evening peak (4 – 8 pm). Operation of both units in this manner would consume up to 32,000 gallons of fuel oil per hour, or the capacity of approximately four 8,000 gallon fuel oil trucks each hour.

To achieve the optimal operating availability, BE II will need to request fuel oil deliveries immediately following the commencement of operation. Such deliveries could be expected to begin within one hour of commencement of startup and continue until the fuel oil storage tank is refilled. While the plant may consume up to four truck loads of fuel oil each hour, truck unloading capability will limit truck deliveries to about two each hour. Using the above operating profile, deliveries would likely be made during the hours of 7 a.m. to 3 p.m. to cover the morning operation and 5 p.m. to 1 a.m. to cover the evening operation. During these periods, therefore, we would expect approximately two fuel oil trucks per hour, if the plant's natural gas supply is not available. On most days of operation, however, we anticipate that the facility will operate on natural gas, and, therefore, there will be no fuel oil deliveries.

Q6. Please identify the size of the trucks that will be delivering the fuel to the facility.

A. Fuel oil delivery trucks typically carry approximately 8,000 gallons, but can range in size from 4,000 – 9,000 gallons.

Q7. Has the Applicant undertaken a traffic study to determine the impacts of these fuel trucks on the surrounding neighborhoods and its traffic patterns?

A. At BE II's request, TPA reviewed BE II's anticipated fuel truck volume and routing. TPA's response, which is attached, indicates very insignificant affect on traffic because of the very few trips expected.

Q8. Has the Applicant undertaken either a traffic or safety study to ascertain the route the fuel trucks will need to travel to get from I-95 to the facility?

A. The closest fuel oil terminal is the Motiva terminal located in the City of Bridgeport. We would anticipate Motiva trucks traveling south from downtown Bridgeport on Interstate 95 and exiting onto Lafayette Street. Trucks would then travel south on Lafayette to Atlantic Street, then east on Atlantic to Russell Street and then south to the Russell Street entrance.

After transferring its fuel oil to BE II's storage tank, the truck would exit onto Henry Street and turn immediately north onto Russell Street. The truck would then head

west on Atlantic Street to Main Street, north on Main Street, west on Whiting Street, north on Broad Street, west on Allen Street and finally north on Lafayette Street, where it could return to the terminal via Interstate 95. A map showing the most likely expected route from I-95 to the facility is included in Petitioner's Exhibit 16.

Q9. Has the Applicant considered alternatives to avoid routing fuel trucks in surrounding residential areas in which such trucks pose a greater risk to children and residents?

A. The route identified above is both the most direct route and minimizes routing trucks through residential areas.

Q10. Specifically, is there a route that the fuel trucks could take which would avoid them traveling on Henry Street, and near the large residential development that has been approved there (but has not yet been built)?

A. The route identified above would require trucks to travel less than one hundred feet on Henry Street prior to turning north onto Russell Street. Due to site constraints, the fuel oil storage tank has been located in the only location available. Truck travel on this limited stretch of Henry Street, therefore, cannot safely be avoided.

Q11. What is the Applicant's evacuation plan for the facility in case of a hurricane?

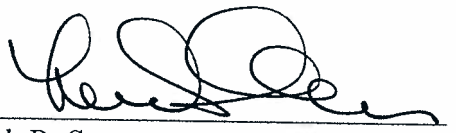
A. The proposed Bridgeport Peaking Station is not anticipated to have any operating personnel to evacuate. It will be operated from the existing Bridgeport Energy Station.

Q12. How would emergency vehicles access the facility in case of a fire or catastrophic event?

A. Emergency vehicles would access the plant via its primary entrance on Russell Street.

Respectfully Submitted,

BRIDGEPORT ENERGY II, LLC

By 

Mark R. Sussman
Loni S. Gardner
Murtha Cullina LLP
CityPlace I, 29th Floor
185 Asylum Street
Hartford, Connecticut 06103-3469
Telephone: (860) 240-6000
Its Attorneys

Planning
Engineering
Landscape Architecture

TPA
DESIGN GROUP

85 Willow Street
New Haven
Connecticut 06511
TEL 203·562·2181
FAX 203·787·7116
www.tpadesigngroup.com

February 22, 2008
Via E-mail: BWheatley@LSPower.com

D. Blake Wheatley, General Manager
Bridgeport Energy II, LLC
400 Chesterfield Center, Suite 110
St. Louis, Missouri 63017

Re: Bridgeport, CT

Dear Sir:

TPA has not conducted a formal "traffic study" for the proposed Bridgeport Peaking Station. However, a review of Bridgeport Energy II's truck traffic projections indicates very insignificant affect on traffic because of the very few trips expected to and from the Plant. Our traffic analysis concerned itself with the traffic routes as indicated below.

On February 21, 2008, we surveyed the geometric condition and traffic flow along the proposed routing and found that the routes indicated below to be the most favorable, with the least impact, especially to residences of the City of Bridgeport.

From I-95 to the plant: After exiting I-95 onto Lafayette Street, trucks would then travel south on Lafayette to Atlantic Street, then east on Atlantic to Russell Street and then south to the Russell Street entrance of the new plant.

From the plant back to I-95: After transferring its fuel oil to the plant's storage tank, the truck would exit onto Henry Street and turn immediately north onto Russell Street. The truck would then head west on Atlantic Street to Main Street, north on Main Street, west on Whiting Street, north on Broad Street, west on Allen Street and finally north on Lafayette Street, where it could return to the terminal via Interstate 95.

Respectfully,

TPA Design Group

Humbert V. Sacco, Jr., P.E.
Chairman

HVS/jgs
F:\DATAWIN\07-019 Bridgeport Peaking Station\02-22-08 REVISED2 Wheatley ltr.doc

PROFESSIONAL CONSULTING SINCE 1945

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been mailed, postage prepaid, this 26th day of February, 2008 to:

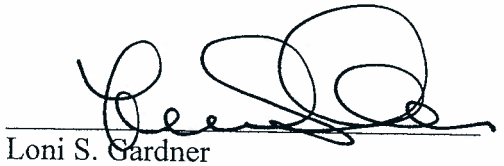
Julie Kohler, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, Connecticut 06604

Bruce L. McDermott
Wigin and Dana LLP
One Century Tower
New Haven, Connecticut 06508-1832

Linda Randell
Senior Vice President
General Counsel and Corporate Secretary
UIL Holdings Corporation
P.O. Box 1564
New Haven, Connecticut 06506-0901

John J. Prete*
Vice President of Transmission Business
The United Illuminating Company
P.O. Box 1564
New Haven, Connecticut 06506-0901

* Sent via regular mail only.



Loni S. Gardner

City of Bridgeport, Connecticut
OFFICE OF PLANNING & ECONOMIC DEVELOPMENT
999 BROAD STREET
BRIDGEPORT, CONNECTICUT 06604
TELEPHONE: (203) 576-7221
FAX: (203) 332-5611

BILL FINCH
Mayor

NANCY L. HADLEY
Director of
Planning and
Economic Development

January 28, 2008

Bridgeport Planning & Zoning Commission
c/o Dennis Buckley, Commission Clerk
City Hall – Room #210
45 Lyon Terrace
Bridgeport, CT 06604

Re: Bridgeport Energy II, LLC
350MW Peaking Plant
Bridgeport, CT

Dear Honorable Commissioners:

I am writing this letter to express the City of Bridgeport's support for the proposed Bridgeport Peaking Station's Coastal Area management (CAM) application. The CT Siting Council has the final approval associated with the siting of any utility facility and the applicant is appearing before your board tonight to address the issue of any adverse impacts on coastal resources. This project is a part of the State's on-going efforts to address the fragile power supply serving our area. The City of Bridgeport shares the state and regional concerns about the significant electric generation capacity shortage projected for southwestern Connecticut.

The Bridgeport Peaking Station is a natural expansion of the Energy Park that has developed around PSEG's Bridgeport Harbor Station. The new plant will be located on land that is a part of the Bridgeport Energy LLC combined cycle gas turbine electric generating facility, only 250 feet east of the United Illuminating Company's Singer Substation, which is currently under construction. No additional gas transmission lines and only a short underground electrical interconnect will be needed for the proposed Peaking Plant to provide much needed electricity to the region.

Representatives of Bridgeport Energy II LLC have met on a number of occasions with City of Bridgeport staff and other local organizations, including the South End Neighborhood Revitalization Zone ("NRZ") Committee to describe the proposed Project and to solicit their input. The company has been in communication with the developer of

EXHIBIT 20

the adjoining 60 Main Street mixed-use waterfront development and they have asked that the Peaking Station incorporate the following elements into their design:

1. Add "green" roofs to the structure.
2. Add large trees (as large as possible) to the landscaping, in addition to the evergreens that are shown.
3. Keep all fuel and delivery trucks off of Henry Street allowing ingress and egress off of Atlantic Street only.

These requests appear to be reasonable and the City supports incorporating these items into the final design to the extent possible.

I am confident that Bridgeport Energy II LLC will continue to cooperate with the City throughout the construction and implementation phases of this Project and that the completed Peaking Station will be of great benefit to the City of Bridgeport and the region in the future.

Sincerely yours,

Nancy L. Hadley, Director
Office of Planning & Economic Development

Pc: Bill Finch – Mayor
Andrew Nunn – CAO
Mike Nidoh – City Planning
John F. Fallon, Esq. – Bridgeport Energy II LLC

CERTIFICATION

This is to certify that on this 26th day of February, 2008, one copy has been sent via email to the Connecticut Siting Council and the original and twenty-five (25) copies of the foregoing Petitioners List of Witnesses and Exhibits was delivered via UPS Overnight to the Connecticut Siting Council, 10 Franklin Square, New Britain, Connecticut 06051 and one copy of the foregoing has been sent via email and mailed, postage prepaid, this 26th day of February, 2008 to:

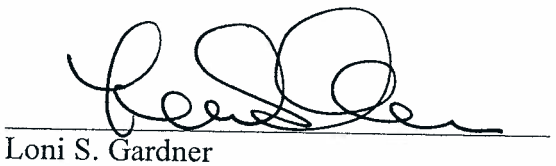
Julie Kohler, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, Connecticut 06604

Bruce L. McDermott
Wigin and Dana LLP
One Century Tower
New Haven, Connecticut 06508-1832

Linda Randell
Senior Vice President
General Counsel and Corporate Secretary
UIL Holdings Corporation
P.O. Box 1564
New Haven, Connecticut 06506-0901

John J. Prete*
Vice President of Transmission Business
The United Illuminating Company
P.O. Box 1564
New Haven, Connecticut 06506-0901

* Sent via regular mail only.



Loni S. Gardner