

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

THE CONNECTICUT LIGHT AND POWER :
COMPANY APPLICATION FOR CERTIFICATES :
OF ENVIRONMENTAL COMPATIBILITY AND :
PUBLIC NEED FOR THE CONNECTICUT VALLEY :
ELECTRIC TRANSMISSION RELIABILITY :
PROJECTS; NRG ENERGY, INC. APPLICATION :
FOR CONSIDERATION OF A COMBINED CYCLE :
GENERATING PLANT IN MERIDEN, CONNECTICUT :

DOCKET NO. 370
RECEIVED
MAY - 8 2009
CONNECTICUT
SITING COUNCIL
MAY 8, 2009

**PETITION OF THE CONNECTICUT ENERGY ADVISORY BOARD
FOR INTERVENOR STATUS**

The Connecticut Energy Advisory Board ("CEAB"), of 804 Brook Street, Building 4, Rocky Hill, Connecticut 06067, hereby requests that the Connecticut Siting Council ("Siting Council") grant it intervenor status in the above-captioned proceeding pursuant to §§ 16-50n and 4-177a of the Connecticut General Statutes. In support of this Request, CEAB represents as follows:

1. Conn. Gen. Stat. § 4-177a(b), in conjunction with Conn. Gen. Stat. § 16-50n, provides that the Siting Council may grant a party intervenor status in certification proceedings where the party files a written petition stating facts demonstrating that its participation is in the interests of justice and will not impair the orderly conduct of the proceedings.
2. CEAB is constituted pursuant to Conn. Gen. Stat. § 16a-3. CEAB's statutory responsibilities include, *inter alia*: preparing an annual Energy Plan; representing the state in regional energy planning; participating in the state's annual load forecast proceeding; and reviewing procurement plans submitted by electric distribution companies.
3. On November 4, 2008, pursuant to Conn. Gen. Stat. § 16a-7c(b), CEAB issued a Request for Proposal ("RFP") seeking alternatives to The Connecticut Light and Power Company's ("CL&P") application, so as to encourage competitive energy solutions. Three entities tendered alternative proposals: NRG Energy, Inc. ("NRG"), Ice Energy, LLC, and GE Energy Financial Services. On February 17, 2009, pursuant to Conn. Gen. Stat. § 16a-7c(f), CEAB submitted a report ("Report") to the Siting Council evaluating CL&P's proposed project and all alternatives with respect to its established infrastructure guidelines ("Preferential Criteria"). Of the three entities that proffered alternatives, only NRG filed an application with the Siting Council.

4. The Siting Council, in this docket, will consider the competing applications of CL&P and NRG and select a project, or any combination of the projects, that represents the most appropriate alternative. Specifically, in this proceeding, CL&P is seeking approval for a Certificate of Environmental Compatibility and Public Need for the Connecticut Portion of the Greater Springfield Reliability Project (“GSRP”). The GSRP is part of the New England East-West Solution (“NEEWS”), an overall transmission-based solution to electric system reliability needs in Connecticut.
5. CEAB’s participation is in the interests of justice and will not impair the orderly conduct of the proceedings. CEAB has interests at stake because the outcome of the proceeding will significantly affect the reliability of the regional electric supply. Further, CEAB’s expertise in the area of energy planning and its familiarity with the proposals at hand will assist the Siting Council in resolving this matter. In particular, CEAB is uniquely able to clarify issues and answer questions pertaining to its Report on conformance of the competing project proposals to the Preferential Criteria.
6. Conn. Gen. Stat. § 4-177a(d) provides that where a request to intervene is granted, the Siting Council may limit the intervenor’s participation to designated issues in which the intervenor has a particular interest as demonstrated by the petition, so as to promote the orderly conduct of the proceedings.
7. CEAB proposes to participate at the hearings, to submit testimony, and to file briefs and other comments as appropriate. However, in accordance with Conn. Gen. Stat. § 4-177a(d), CEAB respectfully requests that its participation be limited in the following manner. CEAB declines to advocate for or recommend a particular project, given that the task of proposal selection is solely within the expertise of the Siting Council. In composing its Report, CEAB’s responsibility was to facilitate and enhance the Siting Council’s review by enabling it to examine the multiple energy solutions simultaneously. Thus, the Report was intended to be an extensive, but more importantly, neutral evaluation. Moreover, CEAB recognized in its Report that, notwithstanding its analysis, the Siting Council would necessarily have to conduct a range of further assessments before a determination could be made as to the appropriateness of any given proposal. Therefore, consistent with its statutory duty, although CEAB may expound upon the analysis presented in its Report, it cannot properly opine or recommend as to which of the prospective projects should be selected.
8. CEAB requests that it be included on the service list for this docket as follows:

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Accordingly, CEAB requests that the Siting Council grant it intervenor status in this proceeding, limited as set forth herein.

CONNECTICUT ENERGY
ADVISORY BOARD

A handwritten signature in cursive script, appearing to read "Michele S. Riverson", written over a horizontal line.

Michele S. Riverson
Assistant Attorney General

CERTIFICATION

I hereby certify that a copy of the foregoing has been via email or first class mail, postage prepaid, to all known parties and intervenors of record on this 8th day of May, 2009.



Michele S. Riverso
Assistant Attorney General