CARMODY & TORRANCE LLP

Attorneys at Law

195 Church Street Post Office Box 1950 New Haven, Connecticut 06509-1950

Telephone: 203 777-5501 Facsimile: 203 784-3199

afitzgerald@carmodylaw.com

Anthony M. Fitzgerald

BY HAND DELIVERY

October 5, 2009

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

Re:

Docket No. 370A: CL&P Application for the Greater Springfield Reliability Project and the Manchester to Meekville Jct. Circuit Separation Project

Docket No. 370B: NRG Energy, Inc. Application Pursuant to C. G.S. § 16-50l(a)(3) for Consideration for a 530 MW Combined Cycle Generation Plant in Meriden, CT.

Dear Mr. Phelps,

I have received a copy of a letter from Attorney McGrath dated October 1, 2009, on behalf of Citizens Against Overhead Powerline Construction, asking for permission to submit late-filed Interrogatories and Testimony. The letter does not identify the subject matter of the proposed Interrogatories, the parties or intervenors to whom they would be directed, explain why they could not have been submitted earlier, or why it would be in the interests of a fair and efficient proceeding to consider them now, after CAOPLC has already conducted a length cross examination. Further, the letter does not identify the subject matter of the proposed testimony or why it was not submitted earlier. (It may be that the proposal is to submit the same pre-filed testimony that was tendered in connection with the joint Connecticut / Massachusetts hearing, but if so, this is not stated.) Accordingly, CL&P at this point can only make a general objection, based on the lateness of the request and the complete lack of supporting argument or documentation. If CAOPLC will make a supplemental response specifically identifying what it proposes to file, CL&P will be able to, and will, respond by identifying the specific proposed interrogatories and/or testimony, if any, to which it objects.

Very truly yours,

Anthony M. Fitzgerald

cc: CSC Service List dated September 18, 2009

{N0835434}

WATERBURY

NEW HAVEN

SOUTHBURY

	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Applicant	☑ U.S. Mail	The Connecticut Light & Power Co. P.O. Box 270 Hartford, CT 06141-0270	Robert E. Carberry, Manager NEEWS Projects Siting and Permitting Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-6774 carbere@nu.com
	⊠ E-mail		Duncan MacKay, Esq. Legal Department Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3495 mackadr@nu.com
	⊠ U.S. Mail		Jeffrey Towle, Project Manager Transmission, NEEWS Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3962 towlejm@nu.com
	⊠ U.S. Mail		Anthony M. Fitzgerald, Esq. Brian T. Henebry, Esq. Carmody & Torrance LLP P.O. Box 1950 New Haven, CT 06509 (203) 777-5501 afitzgerald@carmodylaw.com bhenebry@carmodylaw.com
Intervenor (granted on February 19,	☑ U.S. Mail	NRG Energy, Inc.	NRG Energy, Inc. c/o Julie L. Friedberg, Senior Counsel – NE 211 Carnegie Center Princeton, NJ 08540
2009) Competing Applicant as of 03/19/2009	⊠ U.S. Mail		Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-5723 – fax alord@murthalaw.com

	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
	☑ U.S. Mail	NRG Energy, Inc. continued	Jonathan Milley Vice President, NE Region NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540 (609) 524-4680 (609) 524-5160 fax Jonathan.milley@nrgenergy.com Diana M. Kleefeld, Esq. Murtha Cullina LL CityPlace I, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6035 (860) 240-5974 dkleefeld@murthalaw.com
Party (granted November 20, 2008)	⊠ E-mail	Richard Blumenthal Attorney General	Michael C. Wertheimer Assistant Attorney General Attorney General's Office 10 Franklin Square New Britain, CT 06051 (860) 827-2620 (860) 827-2893 Michael.wertheimer@po.state.ct.us
Party (granted November 20, 2008)	⊠ E-mail ⊠ U.S. Mail	Town of East Granby	Donald R. Holtman, Esq. Katz & Seligman, LLC 130 Washington Street Hartford, CT 06106 (860) 547-1857 (860) 241-9127 dholtman@katzandseligman.com The Honorable James Hayden First Selectman Town of East Granby
			P.O. Box 1858 East Granby, CT 06026

	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Party (granted November 20, 2008)	⊠ U.S. Mail	Town of Suffield	Edward G. McAnaney, Esq. McAnaney & McAnaney Suffield Village 68 Bridge Street Suffield, CT 06078 (860) 668-2000 (860) 668-2666 – fax Mcananey-mcananey@att.net The Honorable Scott R. Lingenfelter First Selectman Suffield Town Hall 83 Mountain Road Suffield, CT 06078
Intervenor (granted December 4, 2008)	⊠ E-mail ⊠ U.S. Mail	ISO New England Inc.	Anthony M. Macleod Whitman Breed Abbott & Morgan LLC 500 West Putnam Avenue, P.O. Box 2250 Greenwich, CT 06830-2250 (203) 862-2458 amacleod@wbamct.com Kevin Flynn, Esq. Regulatory Counsel ISO New England One Sullivan Road Holyoke, MA 01040 (413) 535-4177 kflynn@iso-ne.com
Party (granted on January 8, 2009)	⊠ U.S. Mail	Office of Consumer Counsel	Mary J. Healey Consumer Counsel Ten Franklin Square New Britain, CT 06051 Mary.healey@ct.gov Bruce C. Johnson Principal Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Bruce.johnson@ct.gov

SERVICE DIST			
Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	⊠ E-mail ⊠ E-mail	Office of Consumer Counsel Continued	Victoria Hackett Staff Attorney Office of Consumer Counsel 10 Franklin Square New Britain, CT 06051 860-827-2922 860-827-2929 - fax victoria.hackett@ct.gov
			Paul Chernick, President Resource Insight, Inc. 5 Water Street Arlington, MA 02476 (781) 646-1505 ext. 207 (781) 646-1506 - fax pchernick@resourceinsight.com
Intervenor (granted on January 22, 2009)	⊠ E-mail	Ice Energy, Inc.	Stephen J. Humes, Esq. McCarter & English LLP 185 Asylum Street, CityPlace I Hartford, CT 06103 (860) 275-6761 (860) 560-5955 - fax Shumes@mccarter.com
Party (granted on February 19, 2009)	⊠ E-Mail	Town of Enfield	Kevin M. Deneen, Town Attorney Office of the Town Attorney 820 Enfield Street Enfield, CT 06082-2997 (860) 253-6405 (860) 253-6362 – fax townattorney@enfield.org

Page 5

	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Party (granted on April 7, 2009)	⊠ U.S. Mail	City of Meriden	Deborah L. Moore, City Attorney Meriden City Hall Department of Law 142 East Main St. Meriden, CT 06450 (203) 630-4045 (203) 630-7907 – fax dmoore@ci.meriden.ct.us Lawrence J. Kendzior, City Manager Meriden City Hall 142 East Main St. Meriden, CT 06450 lkendzior@ci.meriden.ct.us
Party (granted on April 7, 2009)	⊠ E-Mail	The United Illuminating Company (UI)	John J. Prete The United Illuminating Company 157 Church Street, P.O. Box 1564 New Haven, CT 06506-1904 (203) 499-3701 (203) 499-3728 neews-ui@uinet.com
	⊠ E-Mail		Linda L. Randell Senior Vice President, General Counsel and Corporate Secretary UIL Holdings Corporation 157 Church St., P.O. Box 1564 New Haven, CT 06506-0901 (203) 499-2575 (203) 499-3664 Linda.randell@uinet.com
	⊠ E-Mail		Bruce L. McDermott Wiggin and Dana LLP One Century Tower New Haven, CT 06508-1832 (203) 498-4340 (203) 782-2889 bmcdermott@wiggin.com

LIST OF PARTIES AND INTERVENORS SERVICE LIST

SERVICE LIST Page 1 Status Wolder Proposentative			
Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Intervenor (granted on June 4, 2009)	⊠ E-Mail	The Connecticut Energy Advisory Board (CEAB)	Michele S. Riverso Assistant Attorney General 10 Franklin Square New Britain, CT 06051 (860) 827-2683 Michele.riverso@po.state.ct.us
	⊠ U.S. Mail		CEAB c/o Gretchen Deans CERC 805 Brook Street, Bldg. 4 Rocky Hill, CT 06067 (860) 571-7147 gdeans@cerc.com
Party (granted on June 4, 2009)	⊠ E-Mail	Connecticut Department of Transportation	Eileen Meskill Assistant Attorney General Office of the Attorney General 55 Elm Street P.O. Box 120 Hartford, CT 06141-0120 Eileen.meskill@po.state.ct.us
	⊠ U.S. Mail		Thomas A. Harley, P.E. Chief Engineer Connecticut Dept. of Transportation 2800 Berlin Turnpike Newington, CT 06131
Intervenor (granted on June 4, 2009)	⊠ E-mail	Farmington River Watershed Association	Eileen Fielding Farmington River Watershed Association 749 Hopmeadow Street Simsbury, CT 06070 (860) 658-4442 (860) 651-7519 fax efielding@frwa.org
Party (granted on June 4, 2009)	⊠ U.S. Mail	Citizens Against Overhead Power Line Construction	Citizens Against Overhead Power Line Construction c/o Richard Legere 1204 Newgate Road West Suffield, CT 06093 (860) 668-0848 (860) 668-0848 rlegere@cox.net

LIST OF PARTIES AND INTERVENORS SERVICE LIST

SERVICE LIST Description			
	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Party (granted on June 4, 2009)	⊠ E- Mail	Citizens Against Overhead Power Line Construction continued	Matthew C. McGrath Attorney at Law 4 Richmond Road West Hartford, CT 06117 (860) 878-0158 (860) 570-1203 – fax McGrath@McGrathLaw.Pro
Intervenor (granted on July 21, 2009)	⊠ E- Mail	Massachusetts Municipal Wholesale Electric Company (MMWEC)	Nicholas J. Scobbo, Jr. Bruce F. Anderson Ferriter Scobbo & Rodophele, PC 125 High Street Boston, MA 02110 (617) 737-1800 ext. 234 (617) 737-1803 fax nscobbo@ferriterscobbo.com Edward Kaczenski Manager, Generation Services Massachusetts Municipal Wholesale Electric Company 327 Moody St., P.O. Box 426 Ludlow, MA 01056 banderson@ferriterscobbo.com
	⊠ E-Mail	Massachusetts Energy Facilities Siting Board (MA EFSB)	Stephen August Presiding Officer Energy Facilities Siting Board One South Station Boston, MA 02110 (617) 305-3525 (617) 443-1116 - fax Stephen.August@state.ma.us