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September 2, 2009

S. Derek Phelps
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

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**CONNECTICUT
SITING COUNCIL**

Re: Docket No. 370 - Application of The Connecticut Light & Power Company for the Connecticut Valley Electric Transmission Reliability Projects; NRG Energy, Inc. Application for a Combined Cycle Generating Plant in Meriden, Connecticut

Dear Mr. Phelps,

The Connecticut Energy Advisory Board ("CEAB") is in receipt of the submission of NRG Energy, Inc. ("NRG"), dated August 25, 2009, in support of its request that The Connecticut Light & Power Company ("CL&P") produce further data embedded in the modeling utilized by London Economics, Inc. ("LEI"), a company retained by CL&P to conduct an economic benefits analysis. CEAB is also in receipt of the submission of CL&P, dated August 31, 2009, in which it asks the Siting Council to deny NRG's request. CEAB urges the Siting Council to grant NRG's data request for the following reasons:

- (1) On June 4, 2009, CL&P issued its First Set of Interrogatories and Data Requests to CEAB. In this filing, CL&P made extensive requests for data embedded in the modeling utilized by CEAB for the economic analysis it conducted in its Evaluation Report. In order to fully respond to CL&P's requests, CEAB necessarily constructed tables of data points similar to those which CL&P now contends are unreasonable and impossible to produce.¹ NRG's request is less onerous than the requests CL&P propounded to CEAB, and the production of this data is essential for an understanding of CL&P's economic analysis.
- (2) At the Siting Council hearing in this docket on August 13, 2009, CL&P witness, Ms. Julia Frayer, provided her explanation as to why the projections in LEI's economic analysis differed from the projections in the economic analysis presented by CEAB in its Evaluation Report. Ms. Frayer based her explanation on the modeling data CEAB had provided in response to CL&P's data requests. In order to have the same

¹ See, especially, CEAB's Responses to CL&P Interrogatories 18, 27, and 29, including all necessary attachments, dated July 9, 2009.

opportunity to explain the differences among the analyses, and appropriately defend and explain its Evaluation Report, CEAB urges that the Siting Council require CL&P to produce the data requested by NRG.

For the reasons stated herein, CEAB respectfully urges the Siting Council to grant NRG's data request. Thank you for your consideration. Please let us know if there is further information we may provide.

Respectfully submitted,

CONNECTICUT ENERGY ADVISORY
BOARD

By: _____
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MSR

cc: Gretchen Deans
Service List