

STATE OF CONNECTICUT

SITING COUNCIL

<p>The Connecticut Light and Power Company application for a Certificate of Environmental Compatibility and Public Need for (1) The Greater Springfield Reliability Project consisting of a new 345-kV electric transmission line and associated facilities from the North Bloomfield Substation in Bloomfield to the Connecticut/Massachusetts border, together with associated improvements to the North Bloomfield Substation, and potentially including portions of a new 345-kV electric transmission line between Ludlow and Agawam, Massachusetts that would be located in the Towns of Suffield and Enfield, Connecticut; and (2) the Manchester Substation to Meekville Junction Circuit Separation Project in Manchester, Connecticut.</p>	<p>DOCKET NO. 370</p>
<p>APPLICATION OF NRG ENERGY, INC. PURSUANT TO CONNECTICUT GENERAL STATUTES § 16-50l(a)(3)</p>	<p>DOCKET NO. 370B</p> <p>March 24, 2009</p>

**FIRST SET
INTERROGATORIES AND DATA REQUESTS
ADDRESSED TO NRG ENERGY, INC.
BY THE CONNECTICUT LIGHT AND POWER COMPANY**

Please provide answers to the following interrogatories and data requests by April 8, 2009.

A. DEFINITIONS

“GSRP” – Greater Springfield Reliability Project.

“ISO” or “ISO-NE” – Independent System Operator New England

“MMP” – Manchester Substation to Meekville Junction Project.

“NRG” – NRG Energy, Inc.

“RMR” – Reliability Must Run.

B. INTERROGATORIES / DATA REQUESTS

1. Does NRG propose the Meriden Plant as an alternative to the entirety of GSRP, including the major portion of GSRP to be located in Massachusetts?
2. Does NRG propose the Meriden Plant as an alternative to specific facilities or segments included within GSRP?
 - a. If so, identify the specific facilities or segments that NRG contends could be displaced by the Meriden Plant.
3. Does NRG propose the Meriden Plant as an alternative to the MMP?
4. Is it NRG’s position that the Siting Council may not find a “public need” for a portion of a transmission line to be constructed in the State of Connecticut based on the fact that the line will resolve reliability criteria violations of the electric power supply system in an adjacent state?
5. Does NRG acknowledge that its Meriden Plant would not address the “Springfield reliability need” that NRG characterizes in its application (p. 8) as “well documented.”
 - a. If the answer to the preceding question is anything other than “Yes,” explain how and the extent to which construction of the Meriden plant would resolve such criteria violations and provide copies of all studies or other electronic or paper documents supporting that answer.

6. Tables FA 1 and FA 3 of the CEII Appendix to Section F of CL&P's Application list the thermal overloads that occurred in power-flow simulations using the assumptions identified in Section F. These include overloads on six different lines serving six different substations located in Connecticut. Would construction of the Meriden Plant eliminate any of these overloads?

- a. If your answer is in the affirmative, identify which overloads would be eliminated; identify the simulation software used; provide electronic copies of the "base cases" in Siemens PTI format, rev 29 or greater and all load flow cases (simulations) run; provide tables identifying all assumptions for load, generation dispatch and regional power transfer levels and outputs; and provide a copy of any report generated.
- b. If you can not say whether or not the Meriden Plant would address these overloads, explain the basis for your contention that the Meriden plant provides an alternative solution to the need that will be addressed by the GSRP.

7. Tables FA 2 and FA 4 of the CEII Appendix to Section F of CL&P's Application lists the voltage violations that occurred in power-flow simulations using the assumptions identified in Section F. These include voltage violations on seven different lines serving ten different substations located in Connecticut. Would construction of the Meriden Plant eliminate any of these voltage violations?

- a. If your answer is in the affirmative, identify which voltage violations would be eliminated; identify the simulation software used; provide electronic copies of the "base cases" in Siemens PTI format, rev 29 or greater and all load flow cases (simulations) run; provide tables identifying all assumptions for load, generation dispatch and regional power transfer levels and outputs; and provide a copy of any report generated.
- b. If you can not say whether or not the Meriden Plant would address these voltage violations, explain the basis for your contention that the Meriden plant provides an alternative solution to the need that will be addressed by the GSRP.

8. The Request for Proposals issued by the CEAB to which NRG responded stated (p.8):


Bidders are advised to perform their own information gathering and due diligence... including obtaining directly from CL&P certain Confidential Energy Infrastructure Information ("CEII") upon which CL&P based its filing and its conclusions.

9. Did NRG request such information from CL&P?
 - a. If NRG claims that it did request such information from CL&P, provide a copy of each such written request, and as to any oral request, identify the person who made the request, the person to whom it was directed, the date of the request and the response given.
 - b. If NRG did not request such information, explain why it did not do so before proposing the Meriden Plant as an alternative means of resolving the reliability need addressed by GSRP (or the portion of GSRP that NRG claims the Meriden Plant will displace.)
10. Has NRG performed or contracted for any studies analyzing whether the Meriden Plant would resolve any of the reliability criteria violations that will be addressed by GSRP and/or MMP?
 - a. If your answer is in the affirmative, identify which criteria violations would be eliminated; identify the simulation software used; provide electronic copies of the "base cases" in Siemens PTI format, rev 29 or greater and all load flow cases (simulations) run; provide tables identifying all assumptions for load, generation dispatch and regional power transfer levels and outputs; and provide a copy of any report generated.
11. In order to provide the reliability benefits claimed for it, would the Meriden Plant have to be operated as an RMR unit?
 - a. If not, explain why not.
12. Has the Meriden Plant received ISO approval under Section I.3.9 under the ISO-NE Transmission, Markets, and Services Tariff?
13. The Meriden Plant expects to receive ISO revenue under the Forward Capacity Market between \$3.00 and \$7.00/kW-month, see page 22. Has the Meriden Plant been qualified by ISO to participate in the Forward Capacity Market? Has the Meriden Plant been approved by ISO to supply capacity in any of the FCM Commitment Periods?

14. Pursuant to the ISO-NE tariff, Connecticut load will be responsible for approximately 27% of the cost of the facilities constructed in Massachusetts as part of the GSRP. Does NRG claim that, by supporting the construction of the Meriden Plant, Connecticut load would be excused from bearing its full share of the cost of the Massachusetts construction?
15. Would the Meriden Plant increase the reliability of the North Bloomfield Substation?
16. Would the Meriden Plant increase the reliability of the Agawam Substation?
17. Why has the Meriden Plant not been constructed in the nine years since it was approved by the Siting Council?
18. At pages 5 and 11 of its Application, NRG states that the Meriden Plant would displace "...older, less efficient units" or "resources."
 - a. By "displaced," do you mean that you would expect the Meriden unit to be run in preference to the other generation, or are you referring to plant retirements?
 - b. In either case, does NRG expect that plant retirements would occur as the result of "displacement" by the Meriden Plant?
 - i. If so, identify which units you would expect to be retired and when you would expect those retirements to occur; or, if you are unable to identify specific units, describe the characteristics of the units you would expect to be retired, including their aggregate capacity (including the likely aggregate capacity to be displaced) age, fuel source, heat rate, location, and NO_x, SO_x, and CO emissions, and the time when you would expect these retirements to occur.
 - ii. If the Meriden Plant were built pursuant to a state contract, would NRG retire any of its own Connecticut plants? If so, which ones?

Respectfully submitted,

**THE CONNECTICUT LIGHT AND
POWER COMPANY**

By: 
Anthony M. Fitzgerald
of Carmody & Torrance LLP
Its Attorneys
195 Church Street
New Haven, CT 06509-1950
(203) 777-5501

CERTIFICATION

This is to certify that a copy of the foregoing has been served on this 24th day of March, 2009 upon all parties and intervenors as listed on the attached Service List, via the document service manner set forth therein.


Anthony M. Fitzgerald

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

Status Granted	Document Service	Status Holder (name, address, & phone number)	Representative (name, address, & phone number)
Applicant	<input checked="" type="checkbox"/> 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
	<input checked="" type="checkbox"/> 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
	<input checked="" type="checkbox"/> 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
	<input checked="" type="checkbox"/> U.S. Mail		Anthony M. Fitzgerald, Esq. Brian T. Henebry, Esq. Carmody & Torrance LLP P.O. Box 1915 New Haven, CT 06509 (203) 777-5501 afitzgerald@carmodylaw.com bhenebry@carmodylaw.com
Party (granted November 20, 2008)	<input checked="" type="checkbox"/> 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

Status Granted	Document Service	Status Holder (name, address, & phone number)	Representative (name, address, & phone number)
Party (granted on January 8, 2009)	<input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> E-Mail <input checked="" type="checkbox"/> E-mail <input checked="" type="checkbox"/> E-mail	Office of Consumer Counsel	<p>Mary J. Healey Consumer Counsel Ten Franklin Square New Britain, CT 06051 Mary.healey@ct.gov</p> <p>Bruce C. Johnson Principal Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Bruce.johnson@ct.gov</p> <p>Victoria Hackett Staff Attorney Office of Consumer counsel 10 Franklin Square New Britain, CT 06051 860-826-2922 Fax: 860-827-2929 Victoria.hackett@ct.gov</p> <p>Paul Chernick, President Resource Insight, Inc. 5 Water Street Arlington, MA 02476 (781) 646-1505 ext. 207 (781) 646-1506 – fax pchernick@resourceinsight.com</p>
Intervenor (granted on January 22, 2009)	<input checked="" type="checkbox"/> E-mail	Ice Energy, Inc.	<p>Stephen J. Humes McCarter & English LLP 185 Asylum Street, CityPlace I Hartford, CT 06103 (860) 275-6761 (860) 560-5955 shumes@mccarter.com</p>
Party (granted on February 19, 2009)	<input checked="" type="checkbox"/> E-mail	Town of Enfield	<p>Kevin M. Deneen Office of the Town Attorney Town of Enfield 820 Enfield Street Enfield, CT 06082-2997 (860) 253-6405 (860) 253-6362 townattorney@enfield.org</p>

Status Granted	Document Service	Status Holder (name, address, & phone number)	Representative (name, address, & phone number)
Intervenor (granted on February 19, 2009)	<input checked="" type="checkbox"/> U.S. Mail	NRG Energy, Inc.	NRG Energy, Inc. c/o Julie L. Friedberg, Senior Counsel – NE 211 Carnegie Center Princeton, NJ 08540
	<input checked="" type="checkbox"/> U.S. Mail		Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29th Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-5723 – fax alord@murthalaw.com
	<input checked="" type="checkbox"/> E- Mail		Diana M. Kleefeld, Esq. Murtha Cullina LLP CityPlace I, 29th Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6035 (860) 240-5974 dkleefeld@murthalaw.com