

280 Trumbull Street  
Hartford, CT 06103-3597  
Main (860) 275-8200  
Fax (860) 275-8299  
jmiranda@rc.com  
Direct (860) 275-8227

Also admitted in District of  
Columbia and Massachusetts

*Via Hand Delivery and Electronic Mail*

January 13, 2011

Linda Roberts  
Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

**Re: Docket No. NT-2010: Reopening of Final Decisions Pursuant to C.G.S. § 4-181(a)(b) for Jurisdictional Natural Gas-Fired Electric Generating Facilities Under C.G.S. § 16-50i(a)(3) and C.G.S. § 16-50k(a) Limited to Council Consideration of Changed Conditions and the Attachment of Conditions to the Certificates and Declaratory Rulings Consistent with the Findings and Recommendations in the Final Report Issued by the Kleen Energy Plant Investigation Review Panel (Nevas Commission) and the Findings and Recommendations in the Executive Report Issued by the Thomas Commission**

Dear Ms. Roberts:



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Waterbury Generation LLC (“WatGen”) hereby submits this letter in lieu of a brief in connection with the above-referenced proceeding. WatGen appreciates the opportunity to participate in this important proceeding.

As indicated in the responses to the Connecticut Siting Council’s (“Council”) interrogatories, the WatGen facility was designed and constructed in accordance with the applicable codes and standards in place at the time of its design. *See* WatGen Exhibit 1, Response 1. Nevertheless, WatGen is willing to accept the attachment of the applicable Thomas Commission report recommendations, including without limitation a ban on the use of flammable gas to conduct “gas blows,” to the Connecticut Siting Council’s approval of the petition for declaratory ruling (Petition No. 831) for its facility. Moreover, in accordance with good engineering practices, to the extent there are future modifications of the WatGen facility, WatGen will design and construct those modifications in accordance with all applicable codes and standards.

# ROBINSON & COLE<sub>LLP</sub>

Linda Roberts  
January 13, 2011  
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Please feel free to contact me if you have any questions or require additional information. Thank you.

Sincerely,



Joey Lee Miranda

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