

ANDREW W. LORD
860.240.6180 DIRECT TELEPHONE
860.240.5723 DIRECT FACSIMILE
ALORD@MURTHALAW.COM

February 2, 2012

VIA HAND DELIVERY

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

Re: Docket No. 187; Milford Power, LLC – Potable Water Consumption

Dear Ms. Roberts:

I write on behalf of Milford Power Company LLC ("Milford Power") to provide you with Milford Power's annual report on the use of potable water as a cooling source. This report is being submitted in accordance with paragraph 2 of the Connecticut Siting Council's ("the Council") Decision and Order, dated April 7, 2009, in the above-referenced docket, which requires Milford Power to provide an annual report on the use of water and identifying contingency events.

As you will see from the attached report, "Milford Power Company LLC, 2011 Monthly Consumption of River Water and Supplemental Potable Water for Cooling," Milford Power used a total of 988,192,572 gallons of water, of which 129,711,677 gallons was potable water, or 13.13 percent. A second table, "Milford Power Company LLC – 2011 Potable Water Usage Summary," lists the dates on which potable water was used, the volumes consumed and the contingency events that necessitated the use of potable water.

As you know, Paragraph 1 of the Decision and Order limits the facility's use of potable water to 15 percent of the annual average consumption of the facility's total water use. Advance approval from the Council is required to exceed the 15 percent limit. As you may recall, Milford Power notified the Council on June 16, 2011 that it had discovered a significant leak in the supply line from the river water pump house to the on-site treatment facilities and that it would be necessary to utilize potable water for cooling until the supply line could be repaired. On September 9, 2011, Milford Power submitted a status report on the repair of the river water supply line and indicated that

Murtha Cullina LLP | Attorneys at Law

BOSTON

HARTFORD

MADISON

NEW HAVEN

STAMFORD

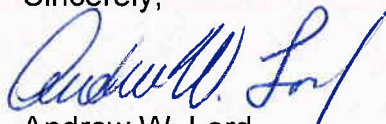
WOBURN

because of the use of potable water during the repair of the supply line, that the 15 percent limit may be exceeded. The Council considered and approved that potable water use request on September 22, 2011. As you will see from the attached reports Milford Power did not exceed the potable water limit in 2011 and was able to keep the actual potable water consumption below the 15 percent limit, in part because the levels of total suspended solids in the river water were within tolerances throughout the second half of the year.

Going forward, in an effort to minimize the use of potable water, Milford Power will be completing \$480,000 of preventative maintenance and instrumentation upgrades on the river water treatment system in the first quarter of 2012. The maintenance activities include the installation of new filter media which will require that the treatment system be taken out of service for approximately 14 days during which time Milford Power will be utilizing potable water as the cooling source. The estimated potable water use while the system is out of service for maintenance is estimated at 33,500,000 gallons. Milford Power should be able to manage the facility's use of potable water to remain below 15 percent of the annual average consumption of the facility's total water use as required by the Decision and Order.

If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



Andrew W. Lord

Enclosure

cc: Mr. Christopher J. Curtis

Milford Power Company LLC
2011 Monthly Consumption of River Water
and Supplemental Potable Water for Cooling

	River Water Usage	Potable Water Usage
	(Gallons)	(Gallons)
January	71,805,985	1,415,584
February	66,824,908	138,853
March	44,375,921	2,348,545
April	70,772,823	195,364
May	88,348,428	375,466
June	13,627,652	64,969,306
July	84,092,360	32,620,879
August	98,579,605	10,710,718
September	79,591,720	15,882,136
October	89,445,942	512,420
November	71,617,418	542,407
December	79,398,133	0
Sub Totals	858,480,895	129,711,677
Total		988,192,572
Percentage of Potable Water to Total		13.13%

Milford Power Company, LLC - Potable Water Usage Summary

		Condition			
		Mechanical Failure	Drought condition or low flow conditions	Routine Maintenance or Operational Issues.	Comment
1/6/2011				105,521	High Blowdown
1/10/2011	893,352				RW Intake Pump Failure
1/15/2011	270,876				RW system tripped
1/16/2011	145,835				RW system tripped
2/1/2011	62,774				RW system tripped
2/2/2011				28,440	High Blowdown Flow
2/9/2011				47,639	High Blowdown Flow
3/9/2011				8,046	Tower Fill Controller lost tower level.
3/11/2011				675,410	RW Coagulant Supply Failure
3/12/2011				1,206,022	RW Coagulant Supply Failure
3/13/2011				82,593	RW Coagulant Supply Failure
3/14/2011				197,735	RW Coagulant Supply Failure
3/30/2011				178,740	RW Contactor Maintenance
4/16/2011				109,663	Loss of power to river water intake building
4/21/2011	85,701				High Blowdown Flow
5/19/2011	261,178				High Blowdown Flow
5/30/2011	6,176				Underground pipe failure and repair
5/31/2011	108,111				Underground pipe failure and repair
6/1/2011	355,016				Underground pipe failure and repair
6/2/2011	696,300				Underground pipe failure and repair
6/3/2011	1,764,746				Underground pipe failure and repair
6/4/2011	2,382,325				Underground pipe failure and repair
6/5/2011	2,276,595				Underground pipe failure and repair
6/6/2011	2,331,817				Underground pipe failure and repair
6/7/2011	2,547,098				Underground pipe failure and repair
6/8/2011	2,584,562				Underground pipe failure and repair
6/9/2011	2,195,628				Underground pipe failure and repair
6/10/2011	2,460,378				Underground pipe failure and repair
6/11/2011	2,233,022				Underground pipe failure and repair
6/12/2011	2,037,022				Underground pipe failure and repair
6/13/2011	2,214,727				Underground pipe failure and repair

6/14/2011	2,062,500	Underground pipe failure and repair
6/15/2011	2,261,981	Underground pipe failure and repair
6/16/2011	2,352,346	Underground pipe failure and repair
6/17/2011	2,350,606	Underground pipe failure and repair
6/18/2011	2,485,775	Underground pipe failure and repair
6/19/2011	2,516,180	Underground pipe failure and repair
6/20/2011	2,402,344	Underground pipe failure and repair
6/21/2011	2,427,352	Underground pipe failure and repair
6/22/2011	2,520,090	Underground pipe failure and repair
6/23/2011	2,398,999	Underground pipe failure and repair
6/24/2011	2,084,756	Underground pipe failure and repair
6/25/2011	2,326,104	Underground pipe failure and repair
6/26/2011	2,310,285	Underground pipe failure and repair
6/27/2011	2,110,417	Underground pipe failure and repair
6/28/2011	3,258,013	Underground pipe failure and repair
6/29/2011	1,636,348	Underground pipe failure and repair
6/30/2011	1,385,974	Underground pipe failure and repair
7/1/2011	755,348	Underground pipe failure and repair
7/2/2011	270,427	Underground pipe failure and repair
7/5/2011	1,012,528	Underground pipe failure and repair
7/6/2011	875,406	Underground pipe failure and repair
7/7/2011	3,205,739	Underground pipe failure and repair
7/8/2011	3,366,455	Underground pipe failure and repair
7/9/2011	3,854,388	Underground pipe failure and repair
7/10/2011	3,672,610	Underground pipe failure and repair
7/11/2011	2,978,388	Underground pipe failure and repair
7/12/2011	1,250,533	Underground pipe failure and repair
7/15/2011	84,317	Acid Pump Failure (Control PH)
7/16/2011	1,433,950	Acid Pump Failure (Control PH)
7/17/2011	1,506,108	Acid Pump Failure (Control PH)
7/18/2011	3,749,795	Acid Pump Failure (Control PH)
7/19/2011	2,016,345	Acid Pump Failure (Control PH)
7/21/2011		Blending with tower water due to poor quality river water
7/22/2011		Blending with tower water due to poor quality river water
7/23/2011		Blending with tower water due to poor quality river water
7/24/2011		Blending with tower water due to poor quality river water
7/25/2011		Blending with tower water due to poor quality river water

7/26/2011	541,336	Blending with tower water due to poor quality river water
7/27/2011	708,243	Blending with tower water due to poor quality river water
7/28/2011	682,472	Blending with tower water due to poor quality river water
7/30/2011	113,354	Blending with tower water due to poor quality river water
8/1/2011	791,937	Blending with tower water due to poor quality river water
8/2/2011	71,181	Blending with tower water due to poor quality river water
8/3/2011	161,892	Blending with tower water due to poor quality river water
8/4/2011	226,772	Blending with tower water due to poor quality river water
8/5/2011	76,210	Blending with tower water due to poor quality river water
8/8/2011	58,760	Blending with tower water due to poor quality river water
8/18/2011	1,579,463	Blending with tower water due to poor quality river water
8/19/2011	1,382,645	Blending with tower water due to poor quality river water
8/23/2011	485,415	Blending with tower water due to poor quality river water
8/24/2011	1,727,886	Blending with tower water due to poor quality river water
8/25/2011	1,495,263	Blending with tower water due to poor quality river water
8/26/2011	602,421	Blending with tower water due to poor quality river water
8/28/2011	1,823,078	Blending with tower water due to poor quality river water
8/29/2011	158,994	Blending with tower water due to poor quality river water
8/31/2011	68,800	Loss of power to RW intake building (Storm)
9/2/2011	1,856,618	Blending with tower water due to poor quality river water
9/3/2011	3,047,890	Blending with tower water due to poor quality river water
9/4/2011	3,139,737	Blending with tower water due to poor quality river water
9/5/2011	2,841,054	Blending with tower water due to poor quality river water
9/6/2011	1,394,853	Blending with tower water due to poor quality river water
9/7/2011	1,942,138	Blending with tower water due to poor quality river water
9/8/2011	1,518,890	Blending with tower water due to poor quality river water
9/16/2011	42,328	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
9/17/2011	60,201	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
9/23/2011	38,427	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.

10/4/2011	7,646	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
10/8/2011	55,966	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
10/14/2011	272,739	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
10/16/2011	82,072	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
10/17/2011	93,998	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
11/1/2011	53,681	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
11/6/2011	72,360	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
11/19/2011	139,134	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.
11/29/2011	277,232	One of the CT fill from river water line check valves cracked. High Blowdown-cannot make up enough through 1 line.

<u>Quarter 1</u>		<u>Quarter 2</u>		<u>Quarter 3</u>		<u>Quarter 4</u>	
January-11	1,415,584	April-11	195,364	July-11	32,620,879	October-11	512,420
February-11	138,853	May-11	375,466	August-11	10,710,718	November-11	542,407
March-11	2,348,545	June-11	64,969,306	September-11	15,882,136	December-11	0

<u>Quarter 1</u>		<u>Quarter 2</u>		<u>Quarter 3</u>		<u>Quarter 4</u>	
January-11	1,415,584	April-11	195,364	July-11	32,620,879	October-11	512,420
February-11	138,853	May-11	375,466	August-11	10,710,718	November-11	542,407
March-11	2,348,545	June-11	64,969,306	September-11	15,882,136	December-11	0

<u>Quarter 1</u>		<u>Quarter 2</u>		<u>Quarter 3</u>		<u>Quarter 4</u>	
January-11	0	April-11	0	July-11	0	October-11	0
February-11	0	May-11	0	August-11	0	November-11	0
March-11	0	June-11	0	September-11	0	December-11	0

108,300,902
0