STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

PETITION NO. 831

PETITION OF WATERBURY GENERATION LLC FOR A DECLARATORY RULING FOR THE CONSTRUCTION OF AN ELECTRIC GENERATING FACILITY AND ASSOCIATED TRANSMISSION LINE TAP IN WATERBURY CONNECTICUT

TESTIMONY OF

JOHN P. CAMPBELL

ON BEHALF OF

WATERBURY GENERATION LLC

JANUARY 3, 2008

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I. INTRODUCTION

Q. Please state your name, position and business address.

A. My name is John P. Campbell. I am the Senior Vice President of Asset Operations for FirstLight Power Resources, Inc. ("FirstLight"). My business address is 20 Church Street, 16th Floor, Hartford, Connecticut 06103. Both FirstLight and Waterbury Generation LLC ("WatGen") are indirect subsidiaries of FirstLight Power Enterprises, Inc.

Q. Briefly describe your background.

A. I have over 30 years of experience in the power industry and joined FirstLight in February 2007. I have a Bachelors of Science degree in Mechanical Engineering from the University of Pittsburgh and am a registered Professional Engineer in the State of Pennsylvania. My experience has spanned every generation technology, including responsibility for over 3,000 megawatts ("MW") of simple cycle and combined cycle natural gas fired generating units, predominantly from General Electric ("GE").

I spent the first 22 years of my career with General Public Utilities ("GPU") in a variety of engineering, project management and operations positions with increasing levels of responsibility. In 2000, I joined Reliant Energy ("Reliant") and became the Managing Director of Reliant's 7,200 MW fleet of coal plants. During this time, I served as project manager overseeing the installation of a $350 million scrubber system in a 1,800 MW coal plant. In 2004, I joined Mirant Corporation as the Vice President of Operations for

their approximately 17,000 MW worldwide generation fleet. I then joined Allegheny Energy as the President of its 12,000 MW generation business.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to assist the Connecticut Siting Council ("Council") in its review of the project proposed in Petition 831 ("Project"). In particular, my testimony will provide the Council with additional information about the Project team and generator technology.

II. PROJECT TEAM

Q. Who will be responsible for Project Management?

A. Under my direction, Project Director Peter Leighton will be responsible for the day-to-day oversight and management of the Project. Mr. Leighton has 28 years of experience in the power and power equipment industry. He spent 11 years in boiler construction, project engineering, project management and start up management with two boiler manufacturers until May 1990.

Mr. Leighton joined Southern Electric International, now Mirant Corporation ("Mirant"), in May 1990 as a Plant Manager. During his career at Mirant, he served as a Plant Manager at two different coal fired generating stations, which were both new facilities. At both plants, Mr. Leighton was responsible for hiring the staff, developing the operations training and procedures and developing the operations and maintenance budgets. Additionally, while at Mirant, he held positions in corporate operations support

as Regional Director of Operations, with responsibility for 3,000 MW of generation and in engineering, project management and fleet reliability. In his career, Mr. Leighton has worked with all generation technologies including combustion turbines, coal and oil fired steam plants, cogeneration and circulating fluidized bed boilers. Mr. Leighton holds an Associates Degree in Mechanical Engineering Technology from The Franklin Institute of Technology in Boston, Massachusetts and has advanced training in Project Management, Finance and Competitive Power Markets.

Q. Who are the other members of the Project Team?

A. Other members of the team will include professionals experienced in the disciplines of construction, engineering, operations, maintenance, project management, environmental compliance and safety and technical support. Throughout the course of the Project, WatGen will also be able to draw on the FirstLight management team, including myself, Curt Morgan and others, who have many years of experience in the construction and operation of power generation facilities.

Q. Who will provide Engineering Procurement and Construction services to the Project?

A. The Project is being constructed under a design-build contract with Lill-DiFazio Constructors, Inc. ("Lill-DiFazio"). Lill-DiFazio is a joint venture between Frank Lill and Son, Inc. and DiFazio Electric, Inc. that was formed to construct turnkey projects for customers installing new power generation projects and equipment. WatGen selected

Lill-DiFazio based on the outstanding reputation and demonstrated capacity of each of these companies to complete projects like the one proposed in Petition 831.

DiFazio Electric, Inc. ("DiFazio") is a major electrical contractor located in Deer Park, New York, that has been in business for over 50 years and has the capacity to perform electrical, instrumentation and control ("I&C") and total turnkey engineering, procurement and construction ("EPC") services for power plant construction. Some of DiFazio's recent projects include:

- 80 MW simple cycle natural gas fired facility for PP&L Global
- 80 MW simple cycle oil fired facility for PP&L Global
- 60 MW simple cycle dual fuel facility for FPL Generation
- 100 MW emergency generation facility for FPL Generation
- 80 MW combined cycle dual fuel facility for Harbert Power, Inc.
- 600 MW AC to DC Converter Station (345 kV to 235 kV) for Neptune Regional Transmission System, LLC
- 150 MW combined cycle dual fuel generation facility for New York Power Authority.

Frank Lill & Son, Inc. ("Lill"), based in Webster, New York, has been operating for 80 years and has gained a nationwide reputation as a quality prime contractor providing mechanical, electrical and civil disciplines to the power plant industry. Lill has been involved in new power plant construction, major plant and turbine renovations and plant modifications including turnkey operations, design and build projects, boiler erection, refractory, power plant process piping, breeching, dust collectors, bag houses and

precipitators, and control systems. Some of Lill's most recent power related projects include work for:

- Westinghouse
- NASA
- General Electric/Tennessee Valley Authority
- NRG Energy
- Destec Michigan Power
- American Ref-Fuel Corporation
- Eastman Kodak Company
- C.R.S. Sirrine Indeck
- Onondaga County Resource Recovery Facility
- Cadbury Schweppes
- General Motors, Delco Division

Q. Who will provide environmental services for the Project?

A. TRC Environmental, an environmental consulting firm, has been retained by WatGen to assist with the environmental permitting of the Project. Mr. Steven Daniels, a State of Connecticut Licensed Environmental Professional ("LEP") from Facility Support Services ("FSS"), will be leading the investigation and remediation activities.

FSS has been retained by Ansonia Copper and Brass to perform the investigation and remediation activities in accordance with the Connecticut Department of Environmental Protection's ("DEP") requirements. Mr. Daniels is an LEP with over twenty years'

experience and is the Technical Director/Managing Partner at FSS. He specializes in environmental site assessment and compliance projects and has managed several large scale Brownfield redevelopment projects throughout Connecticut. Overall, Mr. Daniels has been involved in more than 1,000 environmental site assessment and remediation projects.

All environmental activities at the Project site will be performed under the supervision of Cynthia Vodopivec from FirstLight. Ms. Vodopivec joined FirstLight in December 2006. Prior to joining FirstLight, Ms. Vodopivec was a Project Manager at Environmental Resources Management ("ERM"), a global environmental consulting firm. While at ERM, Ms. Vodopivec managed environmental compliance, including all aspects of permitting, environmental remediation and auditing for industrial, commercial, utility and pharmaceutical companies across the country. Ms. Vodopivec is a registered Professional Environmental Engineer who received a Bachelors Degree from Dartmouth College in Environmental Engineering and is currently pursuing an MBA from Rensselear Polytechnic Institute.

Q. Who is working with The Connecticut Light and Power Company ("CL&P") on the design and construction of the transmission line tap and Baldwin Street Substation improvements?

A. James A. Ginnetti, FirstLight's Vice President, External Affairs and a team of other FirstLight professionals with years of experience in the power industry. Mr. Ginnetti has over 31 years of experience in the electric energy business in New England. He joined

FirstLight in November 2006 from Select Energy, Inc. ("Select"), where he held various leadership positions, most recently Managing Director, Asset Management. Prior to joining Select, Mr. Ginnetti held executive positions at the predecessor to the ISO New England, including having overall responsibility for managing the day-to-day operation of New England's power system. He has a Bachelors Degree in Electrical Engineering from Northeastern University, a Masters Degree in Electrical Engineering from Iowa State University and an MBA from Western New England College.

III. PROJECT TECHNOLOGY

Q. What generator technology has WatGen selected for the Project?

A. WatGen has selected GE's LMS 100 Combustion Turbine Generator Package for its high efficiency, state of the art safety features, low noise and reduced environmental impacts. The LMS 100 was specifically designed by GE for installation and operation in urban areas.

Q. What are some of the operating features of the LMS 100?

A. The LMS 100 reaches simple cycle thermal efficiencies of approximately forty five percent (45%), which is a ten percent (10%) improvement over nearly every other turbine in its size range. In addition, the LMS 100 will be equipped with state of the art safety features to ensure fail safe operation and automatic shut down of the generating facility should any issues arise. Noise levels from the plant will be in compliance with the Connecticut Nighttime Noise Standards at all residential locations. The noise level standing directly next to the LMS 100 will be 75 dBA, which is equivalent to the noise

level from the engine of a sports car driven at 65 miles per hour. The noise level at the property line will be 66 dBA, which is equivalent to the noise level from a noisy restaurant or loud conversation.

Q. What are some of the security features associated with the Project?

A. The Project site will be surrounded by an eight foot (8') tall chain link fence with razor wire, key card access gates, appropriate security lighting and video surveillance cameras, which will be monitored at a power plant control room that is staffed continuously 24 hours per day, 7 days per week.

Q. What are the environmental benefits associated with the LMS 100?

A. The LMS 100 will be equipped with selective catalytic reduction ("SCR") to control nitrous oxide ("NO_X") emissions. Water injection will be used to further control NO_X emissions when the facility is burning ultra low sulfur distillate fuel in order to maintain NO_X emissions below regulatory requirements. The LMS 100 provides a thirty percent (30%) reduction in relative NO_X emissions as compared to other simple cycle turbines. Using the LMS 100, reduces emissions of carbon dioxide ("CO_2") by 18,000 tons when compared to an oil burning plant over the course of expected operation during the peaking season. Because of the LMS 100's efficient operation, no visible plume or odor will be emitted from the exhaust stack during operation of the generating facility. In addition, the oil storage and delivery system will utilize state of the art containment that will ensure protection of the environment and fully contain any spills that may occur during transfer operations.

IV. CONCLUSION

Q. Do you have any concluding remarks?

A. Yes. As discussed more fully above, WatGen has selected an experienced team of professionals and a generation technology that will insure the proper and safe construction, operation and maintenance of the Project.

Q. Does this conclude your testimony?

A. Yes, it does.