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October 15, 2009

VIA HAND DELIVERY

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

Re: Petition No. 907; Response to Department of
Environmental Protection Comment Letter

Dear Mr. Phelps:

I write on behalf of NRG Energy, Inc. ("NRG") and Montville Power LLC ("MPL") to respond to a letter to the Connecticut Siting Council (the "Council") from the Connecticut Department of Environmental Protection ("DEP"), dated October 8, 2009. The DEP letter provides comments on the proposed retrofit of Unit 5 at the NRG/MPL facility in Montville. As requested by Mr. Mercier, this letter provides additional information to address DEP's comments.

1. Fuel Usage/Wastewater Discharges

The proposed facility will use between 350,000 and 400,000 tons of biomass fuel per year, which is approximately 1,000 tons per day. The facility is currently permitted to discharge up to 200 gallons of wastewater per minute, which is 288,000 gallons per day. Currently, the daily water usage varies based on the operation of Unit 5. The retrofitting of Unit 5 will not increase the volume of the discharge above the permit limits.

2. Fuel Supply and Sustainability

As stated at the public hearing, MPL has obtained information from fuel suppliers and a fuel study that indicates that within a 100-mile radius of Montville, the available biomass fuel supply exceeds 1,000,000 tons per year, which would be sufficient to support more than 100 megawatts of biomass-fired generation annually. These findings are consistent with supply studies conducted by the Connecticut Clean Energy Fund and the Massachusetts Division of Energy Resources. With regard to the harvesting

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practices for the fuel supply, the Council can be assured that the fuel will be derived in a sustainable manner as required by state regulations to qualify for Class I Renewable Credits ("RECs"). The Connecticut Department of Public Utility Control has reviewed MPL's proposed operations and has determined that the biomass operations qualify for Class I RECs, provided they meet the applicable emissions criteria.

3. Waste Permitting Issues

MPL does not believe that the facility requires a permit to operate the wood hogger. The wood hogger will only be used to process the small portion of the fuel supply that is larger than specified. The fuel handling system, including the hogger, is very similar to the system proposed in the Watertown biomass project for which no solid waste permits were required. MPL will meet with the DEP to discuss whether a permit is necessary and will obtain any permits that may be required.

4. Wastewater Treatment

On August 27, 2009, MPL attended a pre-application meeting with DEP to discuss the permitting of a wastewater discharge to the Town of Montville sewage treatment plant. DEP staff members, Mr. Ken Major, Ms. Oluwatoyin Fakilede, Ms. Ann Straut-Esden and Ms. Christine Gleason, attended the meeting. DEP requested additional information in order to complete the application. NRG is obtaining the required information.

MPL will modify the information in its registration under the General Permit for the Discharge of Stormwater Associated with Industrial Activities and is aware of the requirement to modify the Stormwater Pollution Control Plan required by this General Permit, as necessary to reflect any changes at the facility.

MPL will register for the General Permit for Discharge of Stormwater Associated with Construction Activities prior to the commencement of construction. Depending upon the acreage associated with the construction, this submittal will be made with the DEP or the Town of Montville, as appropriate.

5. Miscellaneous Comments

MPL will specify to its fuel suppliers to provide chips that are less than two inches. Chips larger than three inches will not fit through the chip-sizing screens.

The fuel storage shed will be capable of housing a 12-day supply of chips.

"Reclaiming wood "chips refers to the process of removing fuel from the storage shed and conveying it to the boiler.

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If you have any questions or require additional information, please contact me.

Sincerely,



Andrew W. Lord

cc: Mr. Jonathan Baylor, NRG
Julie L. Friedberg, Esq., NRG
Service List

LIST OF PARTIES AND INTERVENORS
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