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June 5, 2009

VIA HAND DELIVERY

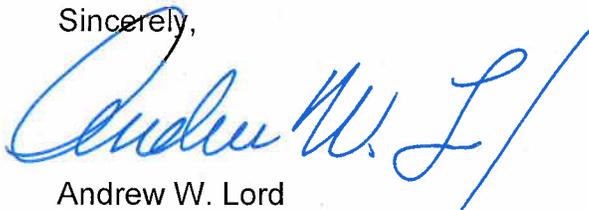
Mr. S. Derek Phelps
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: NRG Energy, Inc. Application Pursuant to CGS § 16-50/(a)(3) for
Consideration of a 530 MW Combined Cycle Generating Plant in
Meriden, Connecticut; Docket No. 370B

Dear Mr. Phelps:

Enclosed on behalf of NRG Energy, Inc. ("NRG") are responses to the first set of interrogatories and data requests addressed to NRG by The Connecticut Light and Power Company.

Sincerely,



Andrew W. Lord

Enclosure

cc: Jonathan J. Milley, NRG
Julie L. Friedberg, Esq., NRG
Service List

Murtha Cullina LLP | Attorneys at Law

BOSTON

HARTFORD

MADISON

NEW HAVEN

STAMFORD

WOBURN

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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?

RESPONSE: To the extent that (a) the GSRP increases import capability into Connecticut, and (b) new generation constructed within the state of Connecticut reduces the need to import power from outside the state, NRG does propose the Meriden Plant as an alternative to the GSRP.

NRG Energy, Inc.
CSC Docket No. 370B

Data Request CL&P-NRG-1
Dated: June 5, 2009
Q-CL&P-2
Page 1 of 1

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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.

RESPONSE: See Response to Q-CL&P-1.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: Does NRG propose the Meriden Plant as an alternative to the MMP?

RESPONSE: According to CL&P's Application, MMP is needed to "reliably accommodate higher power flows on the north-central Connecticut transmission system" that would result from increased imports. CL&P Application, Volume 1, ES-1, F-29. To the extent that (a) the GSRP increases import capability into Connecticut, (b) the MMP is necessary to accommodate those increased imports, and (c) new generation constructed within the state of Connecticut reduces the need to import power from outside the state, NRG does propose the Meriden Plant as an alternative to the MMP.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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?

RESPONSE: NRG objects to this question as it calls for a legal conclusion and the witnesses on the NRG Panel are not lawyers. NRG would be pleased to address this issue in legal briefs.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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.

RESPONSE: As described in the CL&P Application (Volume 1, at F-27), the 115kV system in the Springfield area “serve[s] a double duty of supplying local load and supporting interstate transfers. In fact, under the present system configuration, a portion of the power flowing into Hartford ... can come through the Greater Springfield 115kV system under normal conditions.” To the extent that the Meriden Plant can reduce flows on the Springfield area 115kV system by supplying power to Hartford from the southwest, it could address at least some aspects of the Springfield reliability need.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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.

RESPONSE: NRG has not analyzed any specific overloads. NRG proposed the Meriden Plant as an alternative to GSRP in response to the CEAB's request for proposals based on the representations in the public portion of the CL&P Application regarding the benefit to Connecticut of the GSRP in the form of "[i]ncrease[d] Connecticut import capabilities." See, for example, CL&P Application, Vol. 1 at F-28.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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.

RESPONSE: NRG has not analyzed any specific voltage violations. NRG proposed the Meriden Plant as an alternative to GSRP in response to the CEAB's request for proposals based on the representations in the public portion of the CL&P Application regarding the benefit to Connecticut of the GSRP in the form of "[i]ncrease[d] Connecticut import capabilities." See, for example, CL&P Application, Vol. 1 at F-28.

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CSC Docket No. 370B

Data Request CL&P-NRG-1
Dated: June 5, 2009
Q-CL&P-8
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Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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.

RESPONSE: See Question and Response to Q-CL&P-9 below.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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).

RESPONSE: NRG requested and received the CEII data from CL&P on April 7, 2009, immediately following the Council's ruling on CL&P's Motion for Protective Order with respect to the CEII data (including CL&P's proposed CEII data request forms and nondisclosure agreement). NRG proposed the Meriden Plant as an alternative to GSRP in response to the CEAB's request for proposals based on the representations in the public portion of the CL&P Application regarding the benefit to Connecticut of the GSRP in the form of "[i]ncrease[d] Connecticut import capabilities." See, for example, CL&P Application, Vol. 1 at F-28.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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.

RESPONSE: NRG has not contracted for any studies analyzing whether the Meriden Plant will resolve any of the reliability criteria violations that will be addressed by GSRP and/or MMP. NRG performed a preliminary in-house evaluation of the impact of Connecticut generation on the need for the GSRP transmission upgrades in the Springfield area based on three dispatch scenarios. NRG identified no appreciable criteria violations that would be eliminated through the introduction of Connecticut generation. The evaluation was done using publicly available data and only the 345 kV portions of the GSRP were modeled. NRG used the 2013 summer peak load flow case available to NEPOOL Participants from ISO-New England. NRG did not utilize Siemens PTI in performing its evaluation. The following transmission additions were made, a 345-kV line from Ludlow (MA) to Agawam (MA) to North Bloomfield (CT), two 345/115-kV autotransformers at Agawam and a 2nd 345/115-kV autotransformer at N. Bloomfield. None of the 115 kV GSRP changes were modeled. The generation dispatch from the ISO case was modified to simulate the dispatches used by CL&P in support of their application (located in Volume 1, page F-32, Table F3 of their application). The contingencies tested are the same as used by CL&P (located in Volume 1, Appendix F-2 of the CL&P application). The Connecticut generation scenario assumed generation at three possible sites: 750 MW at Middletown, 750 MW at Meriden, and 300 MW at Franklin Drive with local transmission upgrades added. NRG has not prepared a final report that provides any additional data beyond the information presented in this response.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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.

RESPONSE: No. The need for Reliability-Must-Run ("RMR") treatment generally arises when a unit needed for reliability has relatively high energy costs and therefore is not dispatched in economic merit order. The Meriden Plant, by virtue of its anticipated competitive (low) heat rate, is expected to be "in merit" a high percentage of the time. Thus, NRG does not expect the Meriden Plant to be operated as an RMR unit.

NRG Energy, Inc.
CSC Docket No. 370B

Data Request CL&P-NRG-1
Dated: June 5, 2009
Q-CL&P-12
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Witnesses: NRG Panel

Request from: CL&P

QUESTION: Has the Meriden Plant received ISO approval under Section I.3.9 under the ISO-NE Transmission, Markets, and Services Tariff?

RESPONSE: No.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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?

RESPONSE: The Meriden Plant has no Capacity Supply Obligations as of the present date, but it has been qualified to participate in each of the first two auctions in the Forward Capacity Market, and has applied to be qualified for the third auction.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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?

RESPONSE: The Meriden Plant would not alter the transmission cost sharing requirements of the ISO-NE tariff. To the extent that construction of the Meriden Plant would eliminate the need for some or all of the GSRP, the cost of such facilities would be avoided, thereby relieving Connecticut ratepayers from bearing their share of the cost for those facilities.

NRG Energy, Inc.
CSC Docket No. 370B

Data Request CL&P-NRG-1
Dated: June 5, 2009
Q-CL&P-15
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Witnesses: NRG Panel

Request from: CL&P

QUESTION: Would the Meriden Plant increase the reliability of the North Bloomfield Substation?

RESPONSE: NRG does not have detailed information upon which to base an answer to this question.

NRG Energy, Inc.
CSC Docket No. 370B

Data Request CL&P-NRG-1
Dated: June 5, 2009
Q-CL&P-16
Page 1 of 1

Witnesses: NRG Panel

Request from: CL&P

QUESTION: Would the Meriden Plant increase the reliability of the Agawam Substation?

RESPONSE: NRG does not have detailed information upon which to base an answer to this question.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: Why has the Meriden Plant not been constructed in the nine years since it was approved by the Siting Council?

RESPONSE: A series of external events have precluded completion of the project to date. The Meriden Plant was well on its way to completion in 2001 when the simultaneous crises of the Enron bankruptcy, the Arthur Andersen scandal, and the major regulatory retrenchment in the California wholesale energy market caused a drastic reassessment of the merchant wholesale energy sector overall. This ultimately led to the bankruptcy of many wholesale merchant power producers, NRG being the first in 2002-2003. NRG emerged from bankruptcy in a much stronger financial position and has had consistently good financial results in each of the succeeding years.

Today, NRG is committed to completing the Meriden Plant, as evidenced by NRG's continued permitting activity (air, water, ISO-NE interconnection) and by the continued payment of property taxes to the City of Meriden. To that end, NRG is actively pursuing off-take contracting opportunities which would be necessary to allow NRG to secure financing for the Meriden Plant in the current financial markets.

Witnesses: NRG Panel

Request from: CL&P

QUESTION: 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?

RESPONSE: As noted in the Response to Q-CL&P-11, the Meriden Plant would expect generally to be in economic merit order in the regional wholesale markets. The variable costs of operation for the Meriden Plant are anticipated to be very competitive, which would tend to "displace" some other, higher-cost resources in the daily economic dispatch of the system. In addition, it is possible that the normal operation of the Meriden Plant in economic merit order may make it unnecessary to operate some other resources "out of merit" for reliability purposes, due to the location of the Meriden Plant in southwestern Connecticut. NRG has not made any decisions regarding the retirement of its Connecticut generation plants with or without the Meriden Plant and makes no representations regarding retirements of other merchant plants.

**LIST OF PARTIES AND INTERVENORS
SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<p>Applicant</p>	<input checked="" type="checkbox"/> U.S. Mail	<p>The Connecticut Light & Power Co. P.O. Box 270 Hartford, CT 06141-0270</p>	<p>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</p>
	<input checked="" type="checkbox"/> E-mail		<p>Duncan MacKay, Esq. Legal Department Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3495 mackadr@nu.com</p>
	<input checked="" type="checkbox"/> U.S. Mail		<p>Jeffrey Towle, Project Manager Transmission, NEEWS Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3962 towlejm@nu.com</p>
	<input checked="" type="checkbox"/> U.S. Mail		<p>Anthony M. Fitzgerald, Esq. Brian T. Henebry, Esq. Carmody & Torrance LLP P.O. Box 1950 New Haven, CT 06509 (203) 777-5501 afitzgerald@carmodylaw.com bhenebry@carmodylaw.com</p>
<p>Intervenor (granted on February 19, 2009)</p> <p>Competing Applicant as of 03/19/2009</p>	<input checked="" type="checkbox"/> U.S. Mail	<p>NRG Energy, Inc.</p>	<p>NRG Energy, Inc. c/o Julie L. Friedberg, Senior Counsel – NE 211 Carnegie Center Princeton, NJ 08540</p>
	<input checked="" type="checkbox"/> U.S. Mail		<p>Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-5723 -- fax alord@murthalaw.com</p>

**LIST OF PARTIES AND INTERVENORS
SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
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Party (granted on April 7, 2009)	<input checked="" type="checkbox"/> U.S. Mail	The United Illuminating Company (UI)	John J. Prete The United Illuminating Company 157 Church Street New Haven, CT 06506-1904 (203) 499-3701 (203) 499-3728 uiregulatory@uinet.com
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