

**MURTHA**

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

July 6, 2010

RECEIVED  
JUL - 7 2010

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

CONNECTICUT  
SITING COUNCIL

Re: Docket 190; Meriden Gas Turbines, LLC Facility

Dear Mr. Phelps:

I write on behalf of NRG Energy, Inc. and Meriden Gas Turbines LLC (collectively, "NRG") to request that the Connecticut Siting Council (the "Council") extend the construction schedule for NRG's project in Meriden, Connecticut (the "Meriden Project") until April 27, 2016.

As you know, the Council issued a Certificate of Environmental Compatibility and Public Need ("Certificate") for the Meriden Project on April 27, 1999. Under the terms of the Decision and Order, construction of the project was to be completed by April 27, 2003. For a number of reasons that the Council is familiar with, construction could not be completed within that timeframe, and the Council has granted two extensions of the construction deadline. Although the project had been targeted for completion by April 27, 2011, NRG is not currently in a position to complete construction by that date and is seeking an extension of the construction schedule.

As you know from the recently completed proceeding involving Northeast Utilities' Greater Springfield Reliability Project, and NRG's competitive Application in Docket No. 370, NRG remains committed to completing the Meriden Project. In order to do so, however, NRG must first secure the financing that would allow the Meriden Project to be completed. To secure the financing, NRG will need to enter into a long-term power supply contract with a third party to assure lenders and investors that the project is economically viable.

When NRG last requested an extension of the construction schedule, by letter dated February 1, 2006, NRG correctly predicted that the Department of Public Utility Control ("DPUC") would solicit proposals for quick-start peaking plants to reduce federally-mandated congestion costs. In fact, NRG, through a joint venture with The

Murtha Cullina LLP | Attorneys at Law

BOSTON

HARTFORD

MADISON

NEW HAVEN

STAMFORD

WOBBURN

United Illuminating Company ("UI"), was selected to construct new peaking facilities at its Devon and Middletown Stations. Both projects are now under construction and the Devon peaking project is nearly complete. NRG also predicted that once the peaking plants were complete, that the DPUC would follow with a solicitation for proposals for larger projects to replace aging plants. Currently, the DPUC, through its Integrated Resource Planning ("IRP") process, is considering whether it should begin the procurement process for such generation now or in the near future. Based on the 2010 Comprehensive Plan for the Procurement of Energy Resources submitted to the DPUC on April 27, 2010 by the Connecticut Energy Advisory Board ("CEAB"), the DPUC is now considering in Docket No. 10-02-07 whether to initiate a procurement this year or to revisit the issue in the 2012 planning cycle. Diverse stakeholders in the DPUC IRP proceeding (CEAB, Connecticut Attorney General, Office of Consumer Counsel, the electric distribution companies and several generators) noted the potential electric customer savings and environmental benefits that could be created by constructing new combined cycle gas turbines in Connecticut. Thus, viable commercial opportunities are becoming manifest to serve as the basis for completing the project. NRG has expressed interest in submitting a proposal for the Meriden Project in such a procurement process. The DPUC is expected to issue its decision in late August of this year.

Provided that the DPUC proceeds with a procurement plan for large combined cycle gas-fired generation, the Meriden Project will have several advantages over competing projects. First, the project is already permitted and all of the site civil work has been completed and nearly all of the power island structures are ready to accept installation of the actual equipment. Second, as the Council may recall from Docket No. 370, there is a demonstrated public benefit for the Meriden Project. Third, the Towns of Berlin and Meriden, in particular, strongly support the completion of the project. Finally, NRG has proven, through the DPUC's peaking plant procurement process, that it has the ability to quickly permit, develop and construct generation facilities in a timely manner once it has a long-term power supply contract in place. However, even if the DPUC were to initiate the procurement process this year, it would still take a number of years to bring the Meriden Project on-line. Hence, a five-year extension of the construction schedule is necessary, particularly if the DPUC defers the procurement process until 2012.

In summary, the Meriden Project is a superior alternative to other potential generation projects because it is designed, permitted and partially constructed and therefore is much less risky than projects that would need to start from scratch. Accordingly, an extension of the construction schedule is necessary to allow NRG to move forward quickly, efficiently and effectively when market and regulatory conditions are again favorable for generation projects like the Meriden Project.

Mr. S. Derek Phelps  
July 6, 2010  
Page 3

Thank you for your assistance in this matter. Please contact me if you have any questions or require additional information.

Sincerely,

*Andrew W. Lord*  
Andrew W. Lord *amp*

cc: Julie Friedberg, Esq.  
Mr. Jonathan Milley

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

<b>Status Granted</b>	<b>Status Holder (name, address &amp; phone number)</b>	<b>Representative (name, address &amp; phone number)</b>
<b>Applicant</b>	Meriden Gas Turbines, LLC	<p>Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29<sup>th</sup> Floor 185 Asylum Street Hartford, CT 06103</p> <p>Mr. Raymond G. Long Director, Government Affairs NRG Energy, Inc. Middletown Station P.O. Box 1001 1866 River Road Middletown, Connecticut 06457</p>
<b>Intervenor</b>	The Connecticut Light and Power Company	<p>Daniel P. Venora Senior Counsel Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3395</p>
<b>Intervenor</b>	Rivers Alliance of Connecticut Farmington River Watershed Association	<p>Margery Winters Rivers Alliance of Connecticut 111 Main Street Collinsville, CT 06022</p> <p>Kevin Case Farmington River Watershed Association 749 Hopmeadow Street Simsbury, CT 06070</p>
<b>Party</b>	Quinnipiac River Watershed Association	<p>Sigrun N. Gadwa Executive Director Quinnipiac River Watershed Association 607 E. Main St. #4 Meriden, CT 06450 (address change 06/05) (203) 237-2237</p>