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Energy and Technology Committee

March 1, 2011

Raised Bill 6459 - An Act Concerning Renewable Resource Generation

NRG Energy, Inc. (“NRG”) is pleased to provide comments on Raised Bill 6459 - An Act Concerning Renewable Resource Generation. My name is Jon Gordon, Manager of External Affairs for NRG. NRG is a competitive wholesale generator in Connecticut with power plants located in Montville, Middletown, Norwalk, Devon, Cos Cob, Torrington and Branford. In total, NRG operates over 2,000 MWs in Connecticut, which, in real terms, equates to enough power to serve nearly 1/3 of the state or over 1.4 million households.

NRG fully supports initiatives aimed at improving energy efficiency and providing new, Connecticut-sited renewable and distributed energy options that provide measurable benefits to Connecticut consumers. However, NRG opposes the provisions in Raised Bill 6459, which grant electric distribution companies (“EDCs”) the ability to own and operate generation facilities within the state on a cost of service basis, with no provision for competitive solicitation of the lowest cost renewable generation options.

A well designed competitive bid process is best way to ensure that generation projects that provide the greatest benefit to consumers get built. A competitive RFP process conducted by the DPUC for renewable generation, allows the state to pick renewable energy generation projects based on need and ratepayer benefit. Another alternative would be a DPUC managed RFP process where the EDCs would compete directly with competitive renewable generators for long

term contracts. In fact, as directed by legislation that passed in 2007, the DPUC has completed a successful RFP process where the EDCs competed directly with competitive generators for long-term contracts for peaking generation on a cost of service basis. The DPUC approved nearly 700 MW of new peaking capability in this process, including 400MW of peaking generation through GenConn, a 50/50 partnership between NRG and United Illuminating

A competitively bid process is the only way to insure that ratepayers get only the lowest priced, most efficient renewable generation. If utilities choose to compete in this process, there must be a level playing field for utilities and competitive generators. In this way, the state will be able to select projects on the basis of their impact on prices and consumer costs, and Connecticut will get the benefit of knowing it has chosen the best priced offer for the type of generation needed. Allowing the utilities to develop generation outside a competitive process is not in ratepayer's best interest. as ratepayers cannot be assured that the lowest cost capacity is constructed. As we've seen from Project 150 and the solicitations that resulted from the 2005 and 2007 legislation, competitive solicitations in Connecticut yield robust bidding by a variety of companies and utilities, and provide Connecticut with many options from which the best projects may be chosen.

We strongly suggest that the legislation be modified to allow all companies the opportunity to bid on the renewable and distributed generation projects contemplated in the legislation. The solicitations could be structured such that awarded projects receive a fixed price contract or cost of service – as was done in 2007. We are flexible on this point and have developed projects under both scenarios. Either way, ratepayers will have the benefit of multiple projects (not just the state's two utilities) considered.

Thank you for providing NRG the opportunity to provide comments today.