

December 1, 2008

Gretchen K. Deans
Director of Administration
The Connecticut Economic Resource Center, Inc.
805 Brook St, Bldg 4
Rocky Hill, CT 06067

Re: Comments on CEAB RFP Seeking Alternatives to the Connecticut Light and Power Company's Proposed Greater Springfield Reliability Project and Manchester to Meekville Project

Dear Ms. Deans:

Pursuant to the Connecticut Energy Advisory Board (CEAB) Request for Proposals (RFP) in the above-captioned matter issued on November 4, 2008, Comverge, Inc. submits these Comments. Comverge is a demand response provider in the State of Connecticut, currently providing approximately 40 MWs of load relief in SWCT through a residential and small C&I demand response program. Comverge is also one of the largest providers of demand response and energy efficiency in the country with over 2,200 MW of capacity under management.

As presented in Connecticut Light and Power's (CL&P) application to the Connecticut Siting Council in Docket 370, the level of non-transmission alternatives necessary to supplant the proposed projects is substantial – approximately 1000 MWs. What has not been addressed in the analysis, however, is the impact on the assessment of the 678 MW of peaking generation recently contracted through the Department of Public Utility Control's (DPUC) Final Decision in Docket No. 08-01-01. See RFP pages 7-8. The CEAB has indicated that it will seek to confirm with CL&P the impact of these generation additions on the analysis of need. At the Bidders' Conference held on November 21, 2008, representatives of the CEAB were unable to state when that impact analysis will be completed. Comverge submits that this information is critical to the consideration of non-transmission alternatives as well as allowing any potential bidder to meaningfully participate in this RFP.

While the RFP seeks bids for all or part of the relief needed, the CL&P analysis to the Siting Council indicates that no amount of load relief or additional generation would supplant that need. See Section G. The resources necessary to challenge these conclusions are substantial and not

within the expertise of potential bidders. Under the circumstances, Comverge believes that it would be administratively prudent for the CEAB to first conduct its review of these conclusions, including the impact of the 678 MWs of peaking generation, before setting a deadline for non-transmission alternative bids. Further, the CEAB's review would be useful in providing more specificity on the locations and levels of relief needed geographically than what is available from the CL&P application.

Accordingly, Comverge requests that the CEAB hold in abeyance its RFP and suspend the RFP bidding deadline until it has completed its review of CL&P's application as it relates to non-transmission alternatives and the impact of the peaking units.

Respectfully submitted,

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