

PINPOINT POWER, LLC

August 3, 2007

By Electronic Mail and First-Class Mail

Gretchen Deans
Director of Administration
c/o CEAB
805 Brook Street, Building 4
Rocky Hill, CT 06067

Re: Request for Written Comment on ISO-New England's Need for NEEWS

Dear Ms. Deans:

On behalf of Pinpoint Power, LLC, I would like to respond to the Connecticut Energy Advisory Board ("CEAB" or "Board") request for comments on the advisability of the use of a Proactive Request for Proposal to identify local generation or load management alternatives to the major 345 kilovolt ("kV") transmission project referred to as "New England East-West Solution" or NEEWS. The CEAB has requested comments on alternatives prior to the start of the NEEWS siting processes in 2008.

On January 2, 2007, ISO New England ("ISO-NE") made a presentation to the CEAB about the Southern New England Transmission Reinforcement ("SNETR") project, the former name for NEEWS. At that time, ISO-NE also discussed the feasibility of a generation alternative. "The objective of this analysis was to determine the feasibility of strategically placing utility-grade, base-load generation units in the Southern NE transmission system to defer the need for the previously defined¹ transmission projects." ISO-NE observed that:

"A generic generation alternative, from a practical standpoint, could defer the need for the Interstate Reliability and the Connecticut East-West components if:

- There are no generator retirements,
- Some transmission upgrades are implemented in CT, and
- The reliability problems in other areas (Springfield Reliability and Rhode Island Reliability) are mitigated

There are no generic generation alternatives to the Springfield and Rhode Island area transmission projects that are practical and feasible." ISO Presentation, January 2, 2007.

¹ Southern New England, Central Connecticut, Greater Rhode Island, and Greater Springfield reliability components.

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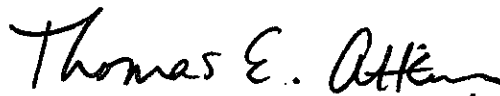
Pinpoint endorses the CEAB's use of a Proactive RFP process to assess the potential benefits of the Central Connecticut reliability portion of the NEEWS project. The use of the Proactive RFP process in this instance is critical in meeting the CEAB's statutory obligation to ensure that any new energy infrastructure project for the state meets the test of being the least cost and most reliable alternative available. C.G.S. Chapter 295, Section 16a-3.

Additionally, such an RFP would be essential for the CEAB to develop a procurement plan beginning in January 2008 in conjunction with the regional ISO and the Connecticut electric distribution companies as required by Public Act 07-242, *An Act Concerning Electricity and Energy Efficiency* (*See* Section 51). As set forth in recently revised Section 16a-7(c), the Board must develop critical information for an annual Connecticut procurement plan. This plan will inform and shape the market for all resources, fine-tune the needs of Connecticut as part of the overall regional plan and best implement Connecticut's objectives to mitigate the energy and environmental impacts of those plans on its residents. Through the recent passage of legislation expanding the scope of CEAB's planning responsibilities the legislature clearly has mandated that the CEAB be proactive rather than reactive in its energy planning coordination role.

Moreover, given the lead time for large regional infrastructure projects, the CEAB's proactive RFP process gives notice to the market for alternative resources to plan and offer competitive solutions. For such large regional projects, delays in development and permitting can cause large cost increases for all electric consumers. However, Connecticut consumers are particularly vulnerable to the impact of congestion costs which market response to a Proactive RFP may alleviate most quickly. A Proactive RFP will help the CEAB to determine and control the localized costs assessed to Connecticut ratepayers.

Pinpoint notes that the Connecticut Department of Public Utility Control ("DPUC") received a robust market response to its recent request for proposals in Docket No. 05-07-14PH02. By identifying the need at the earliest point, the CEAB can ensure the most reliable and least cost resource options are available to meet Connecticut's energy needs.

Sincerely,



Thomas E. Atkins
President, PINPOINT POWER, LLC