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October 2, 2007

VIA FIRST CLASS MAIL AND ELECTRONIC FILING

Louise E. Rickard
Acting Executive Secretary
State of Connecticut
Department of Public Utility Control
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 07-08-24 - DPUC Investigation of the Process and Criteria for Use in
Implementing Section 50 of Public Act 07-242 – Peaking Generation

Ms. Rickard:

Pursuant to the DPUC's Notice of Scope of Proceeding and Request for Written Comments dated September 5, 2007, in the above referenced docket, the New England Power Generators Association, Inc. (NEPGA) hereby respectfully files the following comments.¹ NEPGA is the largest trade association representing competitive electric generating companies in New England. NEPGA's member companies represent approximately 23,000 megawatts of generating capacity throughout New England, and over 7,000 megawatts of generating capacity in Connecticut. NEPGA's mission is to promote sound energy policies which will further economic development, jobs, and balanced environmental policy. In furtherance of that mission, NEPGA supports properly designed competitive markets that enable all resources to compete on a level playing field and to be subject to the competitive pressures of the marketplace to discipline costs. Therefore, NEPGA is categorically opposed to any actions by a state seeking to procure new generation that does not include a competitive process, with market discipline, for determining the most economic projects.

I. BACKGROUND

Section 50 of Public Act 07-242 directs the DPUC to receive, review and approve, approve with modifications, or reject proposals to build peaking units within 120 days of its receipt of complete proposals. The DPUC is required to approve all proposals unless it

¹ The views expressed in these comments do not necessarily represent the positions of each of NEPGA's members. In addition, nothing in these comments should be deemed to waive any rights that NEPGA or any of its members may have to challenge the administrative, procedural or substantive validity of the proposed regulations in any forum.