



Northeast
Utilities System

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February 8, 2008

D26695

Ms. Michele Totten
Department of Environmental Protection
Bureau of Air Management
79 Elm Street
Hartford, CT 06106-5127

RE: Comments for Proposed RCSA §22a-174-31 and §22a-174-31a

Dear Ms. Totten,

Northeast Utilities Service Company (NUSCO) offers the following comments on the proposed RCSA §22a-174-31 Control of Carbon Dioxide Emissions/ Carbon Dioxide Budget Trading Program and RCSA §22a-174-31a Greenhouse Gas Emissions Offset Projects. NUSCO submits these comments on behalf of its affiliates, The Connecticut Light and Power Company, Yankee Gas Services Company, Western Massachusetts Electric Company and Public Service Company of New Hampshire (collectively, "NU").

As stated in NUSCO's comments on the draft regulations dated June 1, 2007, NUSCO continues to be concerned about the upward pressure on the market and the availability of credits for covered sources. Additionally, NUSCO reiterates its previous comment regarding the potential for duplicative programs. NUSCO is concerned that the above referenced regulations, as proposed, do not include a sunset clause should a federal program for climate change be implemented. At this time, the proposed federal programs do not allow for pre-emption in states that already have a program in place. Therefore, there is a potential that when a federal program is adopted, sources in Connecticut will be forced to comply with two cumulative programs. This will further drive up the costs of electricity in the state. To avoid this situation, NUSCO suggests a "sunset clause" be added to the language of the proposed regulations that will close the Connecticut program as soon as any federal program is effective.

NUSCO is pleased to have offered these comments on the proposed regulations. If you have any questions about these comments, please do not hesitate to contact Tracy A. Gionfriddo at (860) 665-5762 or gionfta@nu.com.

Sincerely,

NORTHEAST UTILITIES SERVICE COMPANY as agent for THE CONNECTICUT LIGHT AND POWER COMPANY, YANKEE GAS SERVICES COMPANY, WESTERN MASSACHUSETTS ELECTRIC COMPANY AND PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE (COLLECTIVELY, "NU")



Christie Bradway

Manager, Environmental Compliance and Policy