



STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

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DONALD W. DOWNES
CHAIRPERSON

Nils J. Diaz
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Millstone Power Station Application for Renewed Operating License

Dear Chairman Diaz:

The Connecticut Department of Public Utility Control (Department) submits this letter in support of the Application for Renewed Operating License for Millstone Power Station, located in Waterford, Connecticut. Millstone Power Station consists of Unit 2 and Unit 3. Unit 2 is solely owned and operated by Dominion Nuclear Connecticut, Inc, (Dominion) and Unit 3 is jointly owned by Dominion, Central Vermont Public Service Corporation and Massachusetts Municipal Wholesale Electric Company. Dominion is the operator of Unit 3 and authorized to act as agent for the joint owners. Dominion is seeking renewal of the operating license for a period of 20 years beyond the expiration date of the current operating license for both units (Unit 2 current expiration date is July 31, 2015; Unit 3 current expiration date is November 25, 2025). This letter is in support of both applications for the units, collectively referred to herein as Millstone.

The Department believes that Dominion is one of the best nuclear plant operators in the country and that it has demonstrated an excellent history of nuclear plant operation and safety. The Department would like to offer two additional reasons for granting Millstone's request.

First, from a regional and Connecticut energy needs point of view, Millstone has been an essential resource for the existing bulk power system. This essential resource need is expected to continue as such into the future. It is for this reason that Millstone's license extension is important to continue to serve New England and Connecticut energy needs. The Independent System Operator for the New England bulk power supply system (ISO-NE) publishes an annual regional system plan meant to identify system needs that can impact regional users and identify system solutions that will benefit the entire region. Its most recent annual report, dated January 4, 2005, states that it has identified serious bulk power system problems in Connecticut that pose risks not only for reliable electric service in the state, but also in the entire New England region. Connecticut Energy Plan Framework, 2005 ISO New England, page 5.

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The ISO-NE annual report states that New England could face a capacity shortage if there is high demand for electricity beginning in 2006 and continuing into the future. Id., page 6. Possible means of resolving this looming problem includes, inter alia, additional generation. Accordingly, the Department is greatly concerned that existing, reliable, safe, high capacity factor units such as Millstone be allowed to continue and extend operation. This is especially true given the high demand for fossil fuels upon which most new generation is based. Keeping Millstone operational greatly adds to the diversity of fuel supply in Connecticut and the region.

Second, on August 28, 2001 Connecticut and the New England region committed to a Climate Change Action Plan. The goal of this plan is to mitigate the release of greenhouse gases that are emitted by the combustion of fossil fuels. As is well known, the greenhouse gas emissions from nuclear power plants are negligible. Continued operation of Millstone past its present license expiration dates will displace fossil generation, helping the region to meet its greenhouse gas reduction targets. Extension of the licenses for the Millstone units is very important to meeting this goal.

The Department urges the Commission to consider the above factors in reviewing the request for the Millstone license extension.

Sincerely,



Donald W. Downes
Chairman
Public Utilities Control Commission