

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

NTE Connecticut, LLC application for a	:	
Certificate of Environmental Compatibility	:	
and Public Need for the construction,	:	Docket No. 470
maintenance and operation of a 550-megawatt	:	
dual-fuel combined cycle electric generating	:	
facility and associated electrical interconnection	:	
switchyard located at 180 and 189 Lake Road,	:	October 7, 2016
Killingly, Connecticut	:	

MOTION TO EXTEND

Not Another Power Plant (“NAPP”) hereby requests that the Council extend the deadline for filing pre-filed testimony by two weeks, from October 27, 2016 to November 10, 2016, for its recently retained energy needs expert. In support of its request, NAPP states:

1. On September 29, 2016, NAPP was approved by the Council as a party and CEPA intervenor.
2. On October 7, 2016, NAPP retained Bob Fagan as an expert witness.
3. Mr. Fagan is a mechanical engineer and energy economics analyst with over 25 years of experience in the energy industry.
4. Mr. Fagan’s testimony will greatly assist the Council in making its determination. He has recently provided expert testimony before RI and MA state siting boards on reliability needs associated with proposed new natural gas power plants, and has testified before the California Public Utility Commission on power plant needs in that state given its ongoing commitment to renewable energy alternatives.

5. Mr. Fagan's professional activities focus primarily on electric power industry issues, especially economic and technical analysis of transmission, wholesale electricity markets, renewable resource alternatives and assessment and implementation of demand-side alternatives.
6. Mr. Fagan will testify on the purported reliability needs associated with the proposed plant. He will base his testimony on evidence from ISO New England and other quantitative, publicly-available data that will clearly indicate no current (or likely future) reliability-based need for the proposed Killingly Energy Center.
7. Mr. Fagan will also describe how alternative, reasonable scenarios of power system evolution in Connecticut and New England that exclude construction of new natural gas power plants will ensure energy reliability and meet the region's needs for lower greenhouse gas emissions.
8. Such a comprehensive review does take time, however, and it will not be possible for Mr. Fagan to compile meaningful and complete expert testimony prior to October 27, 2016.

WHEREFORE, for good cause shown, NAPP asks that the deadline for pre-filed testimony for Mr. Fagan be extended by two weeks, from October 27, 2016 to November 10, 2016.

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CERTIFICATION

I hereby certify that a copy of the foregoing document was delivered by e-mail to the service list members on the 7th day of October, 2016, as follows:

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