

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF NTE CONNECTICUT, LLC
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE AND
OPERATION OF AN ELECTRIC POWER
GENERATING FACILITY OFF LAKE ROAD,
KILLINGLY, CONNECTICUT

DOCKET NO. 470

November 2, 2016

MOTION TO DISMISS

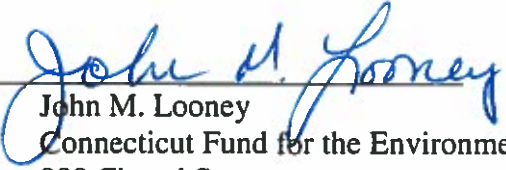
In anticipation of the granting of its Request for Party Status sought pursuant to Conn. Gen. Stat. § 16-50n(a)(3) at the hearing scheduled to begin on November 3, 2016, the Connecticut Fund for the Environment hereby moves that NTE's Application for a Certificate of Environmental Compatibility and Need be dismissed on the grounds that it is incomplete and improperly segments the component parts of its proposed project in order to minimize the potential adverse environmental impacts of its proposed project.

A memorandum of law in support of this Motion to Dismiss accompanies this motion.

Respectfully submitted,

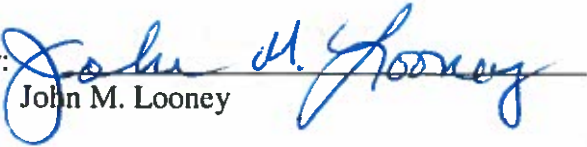
Connecticut Fund for the Environment

BY:


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Connecticut Fund for the Environment
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Its Attorney

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing document was delivered via electronic mail to persons on the attached service list on November 2, 2016.

By: 
John M. Looney

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

| Status Granted | Document Service | Status Holder (name, address & phone number) | Representative (name, address & phone number) |
|---|--|---|---|
| Applicant | <input checked="" type="checkbox"/> E-mail | NTE Connecticut LLC | <p>Kenneth C. Baldwin, Esq. Earl W. Phillips, Jr., Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 kbaldwin@rc.com ephillips@rc.com</p> <p>Mark Mirabito, Vice President NTE Connecticut, LLC 24 Cathedral Place, Ste. 300 St. Augustine, FL 32804 mmirabito@nteenergy.com kec.notices@nteenergy.com</p> <p>Chris Rega, Senior Vice President Engineering & Construction NTE Energy, LLC 800 South Street, Ste. 620 Waltham, MA 02453 crega@nteenergy.com</p> |
| Party & CEPA Intervenor (Approved 9/29/16) | <input checked="" type="checkbox"/> E-mail | Not Another Power Plant | <p>John Bashaw, Esq. Mary Mintel Miller, Esq. Reid and Riege, P.C. One Financial Plaza, 21st Floor Hartford, CT 06103 jbashaw@rrlawpc.com mmiller@rrlawpc.com</p> |
| Party (Approved 9/29/16) | <input checked="" type="checkbox"/> E-mail | Town of Killingly | <p>Sean Hendricks Town Manager Town of Killingly 172 Main Street Killingly, CT 06239 shendricks@killinglyct.org</p> |

