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November 15, 2011

VIA HAND DELIVERY

Ms. Linda Roberts
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

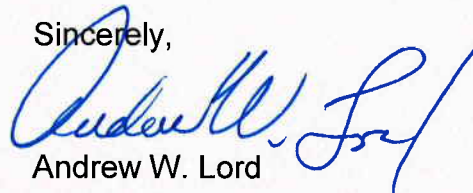
Re: Docket No. 189A; Lake Road Generating Company, L.P.

Dear Ms. Roberts:

I write on behalf of Lake Road Generating Company, L.P. ("Lake Road") to provide you with an original and 20 copies of Lake Road's responses to the Siting Council's Prehearing Interrogatories and List of Witnesses and Exhibits in connection with the above-referenced proceeding.

Please contact me with any questions or requests for additional information.

Sincerely,



Andrew W. Lord

Enclosures

cc: Service List

Date: October 28, 2011

Docket No. 189A
Page 1 of 1

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

| Status Granted | Status Holder (name, address & phone number) | Representative (name, address & phone number) |
|-----------------------|-------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Applicant | Lake Road Generating Company, L.P. | Andrew Lord, Esq. Murtha, Cullina, Richter & Pinney CityPlace I, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 Cynthia E. Vodopived, Director Health, Safety, Security and Environment EquiPower Resources Corporation One Hundred Constitution Plaza, 10 th Fl. Hartford, CT 06103 Christopher J. Curtis General Manager Lake Road Generating Company, L.P. 56 Alexander Parkway Dayville, CT 06241 |
| Party | Town of Killingly | Bruce E. Benway Town Manager Town of Killingly Town Hall, 172 Main Street P.O. Box 6000 Danielson, CT 06239-6000 |
| Intervenor | Connecticut Light and Power Company | Senior Counsel Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06106-0270 (860) 665-3395 |
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**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

| | |
|--------------------------------------|-------------------|
| LAKE ROAD GENERATING COMPANY, L.P. : | DOCKET NO. 189A |
| CERTIFICATE OF ENVIRONMENTAL : | |
| COMPATIBILITY AND PUBLIC NEED FOR : | |
| AN ELECTRIC GENERATING FACILITY : | |
| OFF OF LAKE ROAD IN KILLINGLY, : | |
| CONNECTICUT. REOPENING OF THIS : | |
| DOCKET PURSUANT TO CONNECTICUT : | |
| GENERAL STATUTES § 4-181a(b) TO : | |
| MODIFY THE DECISION AND ORDER IN : | |
| DOCKET 189 TO ALLOW LAKE ROAD : | |
| GENERATING COMPANY TO SUSPEND ITS : | |
| BACKUP FUEL SYSTEM BASED ON : | |
| CHANGED CONDITIONS : | NOVEMBER 15, 2011 |

PRE-HEARING INTERROGATORIES

1. How often was testing of the fuel oil system required per Department of Energy and Environmental Protection (DEEP) air permit requirements?

RESPONSE: Lake Road requested and received modifications to their air permits on July 12, 2011 from DEEP. The modifications require stack testing once every five years from the date of the last oil stack test (on Unit 1) or the date of oil commissioning (for Units 2 and 3) or before 700 hours of operating on oil, whichever is longer. This modification was requested by Lake Road due to the infrequent use of fuel oil and the costs and increased emissions associated with performing the air emission stack tests on a five year basis.

2. Would DEEP air permits for the facility be retained?

RESPONSE: Yes, the air permits that allow Lake Road to operate on fuel oil will be retained. Since the air permits will address the use of distillate fuel oil, as well as natural gas, Lake Road requests that Condition 1(c) of the Siting Council's Decision and Order simply be revised as follows:

(c) *The project shall operate on natural gas. Lake Road may operate using distillate fuel oil as allowed by the Department of Energy and Environmental Protection air permits.*

3. Please briefly explain the de-commissioning process that would be involved in the decommissioning of fuel oil for Unit 1.

RESPONSE: *The fuel oil decommissioning process will include the deactivation of the equipment and controls associated with the operation of the fuel oil system on Unit 1's gas turbine. The protection and control logic, included in the plant distributed control system, will be temporarily disabled in the control system software. The fuel oil hardware and instrumentation will remain installed on the gas turbines but the control wiring and instrument air supplies will be temporarily disconnected at the device. The equipment in the fuel oil supply system, which supplies the fuel oil from the storage tank to the gas turbines, will be drained and placed on a long term maintenance plan. The circuit breakers for the electrical power supplies to the fuel oil equipment will also be locked open to electrically isolate the power supplies to the equipment.*

4. Has Lake Road consulted ISO-New England regarding the decommissioning of the fuel oil system on Unit 1?

RESPONSE: *Yes, Lake Road has discussed the decommissioning of the fuel oil system of Unit 1 with the Senior Management of ISO-New England. We assured them that the fuel oil capability could be reinstalled within a 15 day period should future conditions warrant.*

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LIST OF WITNESSES AND EXHIBITS

I. LIST OF WITNESSES

Lake Road Generating Company, L.P. ("Lake Road") intends to have the following witnesses available to testify at the Connecticut Siting Council's (the "Council") public hearing on November 22, 2011.

- A. Mr. Christopher Curtis, General Manager, Lake Road Generating Company;
Cynthia E. Vodopivec, P.E., Director – Health, Safety, Security and Environmental, EquiPower Resources Corp.; and
Mr. James Ginetti, Senior Vice President, External Affairs and Markets, EquiPower Resources Corp.

II. LIST OF EXHIBITS

Lake Road requests that the Council take Administrative Notice of the following exhibit:

- A. The entire record, including all exhibits and the final decision documents in Docket No. 189.
- B. The entire record, including all exhibits and the final decision documents in Petition No. 377A.

Lake Road intends to offer the following exhibit:

- A. Motion to Reopen Docket No. 189, dated October 24, 2011.
- B. Responses to Prehearing Interrogatories.

Respectfully submitted,

Lake Road Generating Company, L.P.

By: 
Andrew W. Lord

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