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May 21, 2013

VIA ELECTRONIC AND FIRST CLASS MAIL

Robert Stein, Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
United States of America

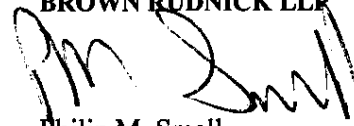
Re: Docket No. 190B—Meriden Gas Turbines, LLC Certificate of Environmental Compatibility and Public Need for a 530 MW Combined Cycle Generating Plant in Meriden, Connecticut. Reopening of this Docket Pursuant to Connecticut General Statutes § 4-181a(b) Limited to Council Consideration of Changed Conditions and a Decommissioning Plan – *City of Meriden Interrogatories to Meriden Gas Turbines, LLC*

Dear Chairman Stein:

On behalf of the City of Meriden (the “City”), enclosed is the City’s first set of interrogatories to Meriden Gas Turbines, LLC.

Very truly yours,

BROWN RUDNICK LLP



Philip M. Small
Counsel for the City of Meriden

Enclosures

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**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

MERIDEN GAS TURBINES, LLC CERTIFICATE : DOCKET NO. 190B
OF ENVIRONMENTAL COMPATIBILITY AND :
PUBLIC NEED FOR A 530 MW COMBINED :
CYCLE GENERATING PLANT IN MERIDEN, :
CONNECTICUT. **Reopening of this docket** :
pursuant to Conn. Gen. Stat. § 4-181a(b) limited to :
Council consideration of changed conditions and : May 21, 2013
Decommissioning Plan.

THE CITY OF MERIDEN'S INTERROGATORIES TO MERIDEN GAS
TURBINES, LLC

The City of Meriden (the "City") respectfully requests that Meriden Gas Turbines, LLC's ("MGT") respond to the following interrogatories by May 28, 2013, or by such other date required by the Siting Council. For the purposes of these interrogatories, MGT includes its predecessors and its affiliates, including its parent company, NRG Energy, Inc.

1. Provide a list of all permits, authorizations, or approvals issued to or obtained by MGT for the 530-megawatt combined cycle electric generating facility (the "Project") at 600 South Mountain Road, Meriden, Connecticut (the "Site") and the current status of each of these permits.
2. Provide copies of the approved final site plan, the approved final Development and Management ("D&M") Plans, and the final construction drawings incorporating all Siting Council conditions and requirements.
3. Provide all documents, reports or correspondences discussing or related to inspections or reviews of the Site during the last 24 months.
4. Describe the extent of construction completed prior to MGT's halting construction and removing equipment on or about 2002.
5. Describe what equipment and facilities were removed from the Site.
6. Identify any wetland areas disturbed during construction and identify measures taken to restore any disturbed wetland areas.
7. Did MGT install or provide all landscaping, plantings, vegetative cover, and soil erosion and control measures as required by the approved development and management plans? Describe any required measures that MGT did not fully install and explain the reason for MGT's failure to do so.

8. Identify any measures taken or systems in place to secure the site.
9. Describe the current condition of, the intended use for, and any plans to remove the existing fuel oil and water tanks.
10. Describe the current condition of, the intended use for, and any plans to remove the main turbine building.
11. Describe the current condition of, the intended use for, and any plans to remove the administrative/control building.
12. Page 50 of the Prospective Real Estate Appraisal of Property Located at Meriden Gas Turbines, LLC, 600 South Mountain Drive, Meriden, CT, by Miner & Silverstein, LLP, dated September 7, 2012 (the "MGT Appraisal") states that "[s]cattered throughout the site are concrete footings and foundations and exposed pipes and conduits that were installed for the power plant use." Describe the current condition of, the intended use for, and any plans to remove these footings, foundations, pipes, and conduits.
13. The MGT Appraisal, on page 50, states that the footings, foundations, pipes, and conduits "will need to be removed for any alternate use." Explain why the MGT appraisal made this statement, and whether MGT agrees with it.
14. Does MGT agree that, as stated on Page 73 of the MGT Appraisal, "[t]he cost to remove the water and fuel tanks should be offset by their scrap value"?
15. Page 52 of the MGT Appraisal describes the Cooling Tower Foundation as consisting "of a 50 x 390 feet concrete foundation with concrete walls to a height of 2 feet. It is designed like a pool, with a sloping floor to collect the cooled water . . ." Describe the current condition of, the intended use for, and any plans to remove the Cooling Tower Foundation.
16. Does MGT agree that "[t]he water and fuel tanks and cooling tower foundation have no use or value to any other user" as stated on Page 55 of the MGT Appraisal?
17. Explain why the MGT Appraisal, on page 51, states that the Power Plant – Generator Building "was designed for a specific use which is not easily or economically convertible to an alternate use."
18. On Page 55, the MGT Appraisal states that the main turbine building "was built specifically to house the turbine systems for the power plant . . . [and has] little adaptability for most (if not all) industrial users." Does MGT agree with this statement?
19. Does MGT believe that the cost to remove the Power Plant Generator Building would be substantially offset by its scrap value?
20. Describe potential industrial uses for the 65-ton bridge crane and its market value.

21. Provide any cost estimates in MGT's possession related to the removal of and the scrap value of any structures on the Site?
22. Was South Mountain Road constructed in accordance with the approved design documents? Were pavement markings, traffic control signs or lighting installed? Does the distance between the toe of the rock slope and the edge of pavement conform to the design documents and is it sufficient to prevent falling rock from landing in the street?
23. Was the detention pond constructed in accordance with the design documents? In particular, are the base and sides seeded with a mix of wetland plants?
24. Describe the current condition of South Mountain Road, including whether any traprock or debris has fallen onto the road surface, and identify any measures taken to prevent loose traprock or debris from falling onto the road surface.
25. Describe MGT's plan to maintain South Mountain Road, including clearing drainage swales and catch basins and removing debris from the roadway.
26. Describe the current status and locations of utilities (electric, water, gas, etc.) to the Site.
27. Does MGT intend to install safety fencing at the top of all rock slopes to prevent persons from accidentally falling off of the slopes while walking on the Site?
28. What provisions have MGT made to direct stormwater to storm drains in order to prevent runoff from damaging cuts faces and fill slopes?
29. Has MGT marketed the Site for sale? If so, describe the marketing efforts and identify any prospective purchasers.
30. Provide copies of all documents in MGT's possession analyzing or discussing the possibility of MGT retaining ownership of the Site for future use as an electric generating facility.
31. Has all stored material and equipment been removed from the Site, including the laydown area located west of the Site?

A copy of this filing has been sent by electronic mail or first class mail to all participants.

Respectfully submitted,

CITY OF MERIDEN

By: 

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Its Attorneys

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Certificate Holder	Meriden Gas Turbines	<p>Andrew W. Lord, Esq. Murtha Cullina CityPlace1, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 alord@murthalaw.com</p> <p>Raymond G. Long Director, Government Affair NRG Energy, Inc. Middletown Station P.O. Box 1001 1866 River Road Middletown, CT 06457 ray.long@nrgenergy.com</p> <p>Judith Lagano NRG Energy, Inc. Manresa Island Avenue South Norwalk, CT 06854 Judith.lagano@nrgenergy.com</p> <p>NRG Energy, Inc. Mahendra Churaman, Esq. 211 Carnegie Center Princeton, NJ 08540 mahendra.churaman@nrgenergy.com</p>
Intervenor	The Connecticut Light and Power Company	<p>Stephen Gibelli, Esq. Associate General Counsel The Connecticut Light & Power Company P.O. Box 270 Hartford, CT 06141-0270</p>

Intervenor	The Connecticut Light and Power Company	<p>John R. Morissette Manager, Regulatory Policy (Transmission) The Connecticut Light & Power Company P.O. Box 270 Hartford, CT 06141-0270 morisjr@nu.com</p> <p>Christopher R. Bernard Manager, Regulatory Policy (Transmission) The Connecticut Light & Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5967 bernacr@nu.com</p> <p>Elizabeth Maldonado Senior Counsel Northeast Utilities Service Company 107 Selden Street Berlin, CT 06037 Elizabeth.Maldonado@nu.com</p>
Intervenor	Rivers Alliance of Connecticut Farmington River Watershed Association	Eric Hammerling, President Rivers Alliance of Connecticut P.O. Box 1797 Litchfield, CT 06759
Party	Quinnipiac River Watershed Association	Mary Mushinsky Executive Director Quinnipiac River Watershed Association P.O. Box 2825 Meriden, CT 06450 qrwa@sbcglobal.com
Party (Approved on April 18, 2013)	City of Meriden	Philip M. Small Scott A. Muska Brown Rudnick LLP 185 Asylum Street, 38th Floor Hartford, CT 06103 psmall@brownrudnick.com smuska@brownrudnick.com

		<p>Deborah L. Moore City of Meriden 142 East Main Street Meriden, CT 06450 dmoore@meridenct.gov</p>
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