

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

AN APPLICATION BY TOWANTIC ENERGY, LLC : DOCKET NO. 192B  
FOR A CERTIFICATE OF ENVIRONMENTAL :  
COMPATIBILITY AND PUBLIC NEED FOR THE :  
CONSTRUCTION, MAINTENANCE AND :  
OPERATION OF A PROPOSED ELECTRIC :  
GENERATING FACILITY LOCATED NORTH OF :  
THE PROKOP ROAD AND TOWANTIC HILL ROAD : DECEMBER 23, 2014  
INTERSECTION IN THE TOWN OF OXFORD, :  
CONNECTICUT :

**PRE-HEARING INTERROGATORIES & REQUESTS FOR PRODUCTION**  
**DIRECTED TO CPV TOWANTIC, L.L.C.**

1. List the names and addresses of all individuals with more than a 5% ownership interest in the certificate holder CPV Towantic LLC as of November 3, 2014.
  
2. List the names, addresses, and qualifications including the number of any vocational or professional license issued by the State of Connecticut, if any, to those individuals that contributed to Exhibit 1 and Exhibit 2 referenced by and made a part of submission of the Petition to Reopen and Modify of CPV Towantic LLC filed November 3, 2014.
  
3. List the names, addresses and qualifications including the number of any vocational or professional license issued by the State of Connecticut, if any, of those individuals that the certificate holder and petitioner intend to have testify to the Connecticut Siting Council in support of Exhibit 1 and Exhibit 2 referenced by and made a part of submission of the Petition to Reopen and Modify of CPV Towantic LLC filed November 3, 2014.
  
4. Besides the Inland Energy Center in Riverside County, California (as cited in Tetra Tech "Environmental Overview" report Para. 2.1.1, page 5) where else in the United States has the proposed GE Frame 7H-Series operated?

5. With respect to the proposed GE Frame 7HA.01 turbines, list the location and total number of hours of operation in the six months prior to the date that CPV Towantic LLC filed its Petition to Reopen and Modify ie. March 3, 2014 – November 2, 2014.
  
6. Does the wastewater discharged from the plant pass through the Town of Middlebury? Describe, or provide a map, of the course by which the wastewater discharged to the municipal sewer system travels to the Naugatuck Wastewater Treatment Plant.
  
7. Describe the mitigation incorporated into the Project to meet the documented Nighttime Noise Limit of 51 dBA at the nearest residentially zoned area being the Oxford-Middlebury town line north of the Project.
  
8. Describe the mitigation incorporated into each of the “three smaller and shorter building enclosures” (per Change No. 5 listed in the Petition, page 10; Tetra Tech “Environmental Overview” report Para. 2.5) proposed in lieu of one large combustion turbine and steam turbine building.
  
9. Provide a copy of the complete filing submitted to the State of Connecticut Department of Energy and Environmental Protection (DEEP) on or about September 8, 2014 as cited in Tetra Tech “Environmental Overview” report Para. 4.0, page 22, Exhibit 1 to the Petition.
  
10. Describe in greater detail, or provide, the specific references used as input to the acoustic model described as “information contained in reference documents, or developed using empirical methods” (in Tetra Tech “Environmental Overview” report Para. 4.1.4, page 35).

11. Explain the reason and difference in cost estimate for the "ULSD storage, previously two 40-foot tall tanks, [that is proposed to be changed] now one tank that will be 48 feet tall."
  
12. Explain the reason and difference in cost estimate for the "The single water storage tank [that is proposed to be changed to] two water storage tanks that are 42 feet tall."
  
13. Describe in detail the significant benchmarks of the proposed Facility in intervals of six months beginning in June 1, 2015 including an estimate of the schedule for financing, permitting and construction to allow the completion of the Project by the proposed extension of the construction deadline of June 1, 2019.

RESPECTFULLY SUBMITTED BY,  
TOWN OF MIDDLEBURY

By: 

Stephen L. Savarese

103 South Main Street

Newtown, CT 06470

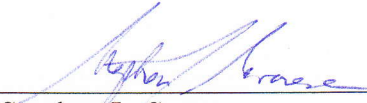
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### Certification

This is to certify that the foregoing was mailed or electronically delivered on the 23<sup>rd</sup> day of December, 2014 on the Acting Executive Director of the Connecticut Siting Council, applicant, parties, and intervenors on the attached service list.



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Stephen L. Savarese  
Commissioner of the Superior Court

**LIST OF PARTIES AND INTERVENORS  
SERVICE LIST**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Applicant</b>	CPV Towantic, L.L.C.	Franca L. DeRosa, Esq. Philip M. Small, Esq. Brown Rudnick LLP 185 Asylum Street Hartford, CT 06103 (860) 509-6500 (860) 509-6501 – fax <a href="mailto:fderosa@brownrudnick.com">fderosa@brownrudnick.com</a> <a href="mailto:psmall@brownrudnick.com">psmall@brownrudnick.com</a>
<b>Party</b>	Jay Halpern 58 Jackson Cove Road Oxford, CT 06478 h: 203-888-4976 <a href="mailto:zoarmonster@sbcglobal.net">zoarmonster@sbcglobal.net</a>  Peter Thomas 72 Towantic Hill Rd. Oxford, CT 06478 203-720-1536	
<b>Intervenor</b>	Town of Middlebury	Attorney Dana A. D'Angelo Law Offices of Dana D'Angelo, LLC 20 Woodside Avenue Middlebury, CT 06762 (203) 598-3336 (203) 598-7283 – fax <a href="mailto:Dangelo.middlebury@snet.net">Dangelo.middlebury@snet.net</a>  Stephen L. Savarese, Esq. 103 South Main Street Newtown, CT 06470 203-270-0077 <a href="mailto:attystephensavarese@gmail.com">attystephensavarese@gmail.com</a>
<b>Intervenor</b>	The Connecticut Light and Power Company (CL&P)	Stephen Gibelli, Esq. Associate General Counsel The Connecticut Light and Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5513 (860) 665-5504 –fax <a href="mailto:gibels@nu.com">gibels@nu.com</a>

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	CL&P continued...	<p>John R. Morissette Manager-Transmission Siting and Permitting The Connecticut Light and Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-2036 <a href="mailto:morisjr@nu.com">morisjr@nu.com</a></p> <p>Christopher R. Bernard Manager, Regulatory Policy (Transmission) The Connecticut Light and Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5967 (860) 665-3314 – fax <a href="mailto:bernacr@nu.com">bernacr@nu.com</a></p> <p>Stella Pace, Senior Engineer The Connecticut Light and Power Company Transmission and Interconnection Dept. P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3569 <a href="mailto:pacess@nu.com">pacess@nu.com</a></p> <p>Jeffery D. Cochran Northeast Utilities Service Company 107 Selden Street Berlin, CT 06037 860-665-3548 <a href="mailto:cochrjd@nu.com">cochrjd@nu.com</a></p>
<b>Party</b>	Town of Oxford	<p>Francis A. Teodosio, Esq. Winnick, Vine, Welch &amp; Teodosio, LLC 481 Oxford Road Oxford, CT 06478 <a href="mailto:fteodosio@vwwtlaw.com">fteodosio@vwwtlaw.com</a> (203) 881-3600 (203) 881-3606 fax</p>
<b>Party</b>	Naugatuck Valley Chapter Trout Unlimited	<p>Robert M. Perrella, Vice President TU Naugatuck/Pomperaug Valley Chapter 278 W. Purchase Road Southbury, CT 06488-1004 <a href="mailto:johnnytroutseed@chartner.net">johnnytroutseed@chartner.net</a></p>

<b>Intervenor</b>	Town of Southbury	Ed Edelson First Selectman Town of Southbury 501 Main Street Southbury, CT 06488 <a href="mailto:selectman@southbury-ct.gov">selectman@southbury-ct.gov</a> (203) 262-0647 (203) 264-9762 – fax
<b>Party</b>	The Pomperaug River Watershed Coalition	Len DeJong, Executive Director Pomperaug River Watershed Coalition 39 Sherman Hill Road, C103 Woodbury, CT 06798 203-263-0076 <a href="mailto:LDeJong@pomperaug.org">LDeJong@pomperaug.org</a>
<b>Intervenor (approved 06/07/06)</b>	Raymond Pietrorazio 764 Charcoal Avenue Middlebury, CT 06762-1311 (203) 758-2413 (203) 758-9519 – fax <a href="mailto:ray@ctcombustion.com">ray@ctcombustion.com</a>	
<b>Intervenor (approved 10/10/06)</b>	GE Energy Financial Services, Inc.	Jay F. Malcynsky The Law Offices of Jay F. Malcynsky, P.C. One Liberty Square New Britain, CT 06051 (860) 229-0301 (860) 225-4627 – fax <a href="mailto:Jmalcynsky@gaffneybennett.com">Jmalcynsky@gaffneybennett.com</a>
<b>Intervenor (Approved on November 13, 2014)</b>	Borough of Naugatuck and Borough of Naugatuck Water Pollution Control Authority	Edward G. Fitzpatrick, Esq. Fitzpatrick, Mariano, Santos, Sousa, PC 203 Church Street Naugatuck, CT 06770 203-729-4555 <a href="mailto:Fitz@fmslaw.org">Fitz@fmslaw.org</a>  Ronald Merancy, Chairman Water Pollution Control Authority 229 Church Street Naugatuck, CT 06770 203-720-7000 <a href="mailto:Rjm62159@aol.com">Rjm62159@aol.com</a>