

**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 : DECEMBER 23, 2014  
TOWANTIC HILL ROAD INTERSECTION IN THE  
TOWN OF OXFORD, CONNECTICUT

**PRE-HEARING INTERROGATORIES SUBMITTED BY  
THE BOROUGH OF NAUGATUCK AND BOROUGH OF NAUGATUCK WATER  
POLLUTION CONTROL AUTHORITY DIRECTED TO CPV TOWANTIC, LLC**

- I. **Preliminary Witness List** – At this time, the Borough of Naugatuck (“Borough”) and the Borough of Naugatuck Water Pollution Control Authority (“WPCA”) do not have a preliminary witness list, but reserve its right to provide one at a later date.
  
- II. **Pre-Filed Testimony** – At this time, the Borough and WPCA do not contemplate filing pre-filed testimony, but reserve its right to do so.
  
- III. **Pre-Hearing Interrogatories**
  1. Provide the original submissions to the WPCA from the previous application for a 512mw dual fuel combined cycle application and describe in detail changes from the original submission and certifications with the representations for the current 785mw dual fuel proposal.
  
  2. Describe in detail and provide a map, with descriptions of the sewer line including inspection film depicting the scoping of the course and capacity of the lines by which the wastewater discharged to the Oxford municipal sewer system travels to the Naugatuck Wastewater Treatment Plant.
  
  3. Describe in detail the chemical composition, quantity, kind, quality, nature and temperature of the effluent “grey water” proposed to be discharged to the Naugatuck Wastewater Treatment Plant when operating on Natural Gas at full performance and ULSD.

4. Describe in detail contingency plans for wastewater processing in the event that the Naugatuck Wastewater Treatment Plant is closed for emergency or maintenance or upgrade?
5. Does the effluent “grey water” override the plant and get discharged into the Naugatuck Wastewater Treatment Plant in the event of a treatment plan closing?
6. What is the temperature of the wastewater released into the Oxford municipal sewer lines and Naugatuck Wastewater Treatment Plant at points 500 feet subsequent to the inlet point of the Naugatuck Wastewater Treatment Plant?
7. What is the quantity, scope and range of the particulate matter that will be discharged over the Borough?

The Borough and the WPCA reserve the right to offer additional testimony to address new and pertinent information that it receives and to address topics that may arise during the proceeding.

Correspondence and other communications in regard to this matter should be served upon the following persons:

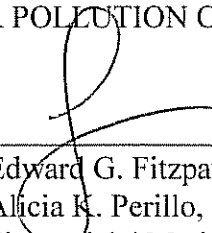
Edward G. Fitzpatrick, Esq.  
Alicia K. Perillo, Esq.  
Fitzpatrick | Mariano | Santos | Sousa, PC  
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Naugatuck, CT 06770  
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Email: [fitz@fmsslaw.org](mailto:fitz@fmsslaw.org)  
Email: [alicia@fmsslaw.org](mailto:alicia@fmsslaw.org)

Water Pollution Control Authority  
Ronald Merancy, Chairman  
229 Church Street  
Naugatuck, CT 06770  
Telephone: 203-720-7000  
Email: [RJM62156@aol.com](mailto:RJM62156@aol.com)

Respectfully submitted,

BOROUGH OF NAUGATUCK and  
WATER POLLUTION CONTROL AUTHORITY,

BY:

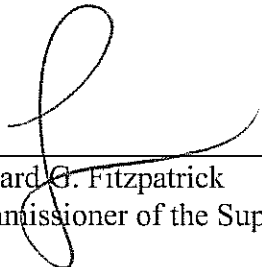


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Edward G. Fitzpatrick, Esq.  
Alicia K. Perillo, Esq.  
Fitzpatrick | Mariano | Santos | Sousa, PC  
Its Attorney  
203 Church Street  
Naugatuck, CT 06770

**Certification**

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



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Edward G. Fitzpatrick  
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)
Applicant	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>
Party	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	
Intervenor	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>
Intervenor	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:cochrid@nu.com">cochrid@nu.com</a></p>
Party	Town of Oxford	<p>Francis A. Teodosio, Esq. Winnick, Vine, Welch &amp; Teodosio, LLC 481 Oxford Road Oxford, CT 06478 <a href="mailto:fteodosio@wvwtlaw.com">fteodosio@wvwtlaw.com</a> (203) 881-3600 (203) 881-3606 fax</p>
Party	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@paffreybennett.com">jmalcynsky@paffreybennett.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>