

Witness: N/A

Question Halpern-1:

The town of Oxford sold the Woodruff Hill property, including the invaluable junction of power and gas lines to Arena Capital for \$150,000 without citizen approval by referendum. [Janis Lipman paid six times that subsequently for a house in Westport.] What did CPV Towantic pay for the property with certificate?

Response:

CPV Towantic, LLC ("CPV") objects to this interrogatory on the following grounds:

1. It contains allegations of "facts" that did not occur and/or whether or not they occurred is outside CPV's knowledge.
2. It seeks information on matters that are not at issue in this docket and not within the scope of the Connecticut Siting Council's statutory authority under the Public Utility Environmental Standards Act, Conn. Gen. Stat. §16-50g et seq. (the "Act").

Witness: N/A

Question Halpern-2:

At deposition, Janis Lipman made it clear that possession of the junction of gas and power lines was the primary consideration behind the purchase, a “no-brainer.” Proximity to an airport (now second largest in CT with corporate jets as well as recreational flights), proximity to residential property (the Woodruff Hill property, itself, being zoned residential when sold -so dazzled were the local Oxford “leaders” by Gold Coast money waltzing into town that, when Citizens for the Defense of Oxford noted this illegality, there was a P&Z rush to re-zone and rewrite a new contract), the lack of adequate roads to permit the delivery of gas turbines (true today as well), the lack of road access and traffic studies asserting the safety of the multiple oil deliveries that the dual-fuel plant will require, the impact on wetlands and sensitive ecosystems and, last but hardly least, the dependence upon our region’s potable aquifer for functionality WERE ALL ISSUES OF NO MORE THAN PUBLIC RELATIONS CONSIDERATION. All of that noted, please summarize CPV Towantic’s approach to these problems, including any bonding, mandatory neutral/,third-party oversight, response contingencies FUNDED SOLELY BY THE APPLICANT/CERTIFICATE HOLDER and any time-line for rapid restitution.

Response:

CPV objects to this interrogatory on the following grounds:

1. It levies serious, undocumented and irrelevant allegations of misconduct against parties and intervenors and individuals participating in this docket and/or predecessor dockets, as well as non-participants in these dockets.
2. It is overly broad, vague, unduly burdensome and fails to identify the information sought with reasonable specificity.
3. It contains allegations of “facts” that did not occur and/or whether they occurred is outside CPV’s knowledge.
4. It seeks information on matters that are not at issue in this docket and not within the scope of the Connecticut Siting Council’s statutory authority under the Act.
5. It attempts to impose discovery obligations on CPV well in excess of those required or authorized by applicable statutes and regulations including Conn.

Gen. Stat. §§4-177(c) and 4-178, and §16-50j-22a(c) of the Siting Council's regulations.

Witness: N/A

Question Halpern-3:

In deposition, CDO pointed out that an entry in George Temple's appointment book indicated a clear ex parte illegality. When snagged, he blamed his wife for the entry. Please provide a complete listing – dates, places and times – of all contacts CPV Towantic has had with officials from the town of Oxford, including phone/smartphone records.

Response:

CPV objects to this interrogatory on the following grounds:

1. It levies serious, undocumented and irrelevant allegations of misconduct against parties and intervenors and individuals participating in this docket and/or predecessor dockets, as well as non-participants in these dockets.
2. It contains allegations of "facts" that did not occur and/or whether they occurred is outside CPV's knowledge.
3. It seeks information on matters that are not at issue in this docket and not within the scope of the Connecticut Siting Council's statutory authority under the Act.
4. It attempts to impose discovery obligations on CPV well in excess of those required or authorized by applicable statutes and regulations including Conn. Gen. Stat. §§4-177(c) and 4-178, and §16-50j-22a(c) of the Siting Council's regulations.

Witness: N/A

Question Halpern-4:

In deposition, Janis Lipman revealed that GE was not only the vendor of turbines but also financed all legal fees, which ultimately went all the way the state Supreme Court. Please provide documentation of any similar link between CPV Towantic and GE or any other third party heretofore unknown by the CSC and we who are parties/intervenors.

Response:

CPV objects to this interrogatory on the following grounds:

1. It contains allegations of “facts” that did not occur and/or whether or not they occurred is outside CPV’s knowledge.
2. It attempts to impose discovery obligations on CPV well in excess of those required or authorized by applicable statutes and regulations including Conn. Gen. Stat. §§4-177(c) and 4-178, and §16-50j-22a(c) of the Siting Council’s regulations.
3. It seeks information on matters that are not at issue in this docket and not within the scope of the Connecticut Siting Council’s statutory authority under the Act.

Witness: N/A

Question Halpern-5:

CPV Towantic seems to have garnered vocal union support for this project. Please document whether CPV Towantic supports the expansion of collective-bargaining rights through its contributions to PACs, industry lobby consortiums, individual elected representatives or candidates, or supports the restriction or elimination of collective bargaining rights through the same bodies.

Response:

CPV objects to this interrogatory on the following grounds:

1. It attempts to impose discovery obligations on CPV well in excess of those required or authorized by applicable statutes and regulations including Conn. Gen. Stat. §§4-177(c) and 4-178, and §16-50j-22a(c) of the Siting Council's regulations.
2. It seeks information on matters that are not at issue in this docket and not within the scope of the Connecticut Siting Council's statutory authority under the Act.

Witness: Fred Sellars

Question Halpern-6:

In previous incarnations, the power plant owner chose pollution offsets that were not in operation. Please share your list of potential offsets for scrutiny.

Response:

CPV objects to this interrogatory on the following grounds:

1. It seeks information on matters that are not at issue in this docket and not within the scope of the Connecticut Siting Council's statutory authority under the Act.

Without waiving its objections, CPV responds to this interrogatory as follows: Please see the Response to Q-CSC-18 dated February 11, 2015.

Witness: Andrew J. Bazinet

Question Halpern-7:

A long time ago (but not far away), a group called Toxics Action Center suddenly appeared to help CDO with its fight against the power plant. The attorney they recommended, Keith Ainesworth, was so bungling and incompetent that CDO almost lost standing due to a variety of “bad back” and other issues that prevented him from the timely filing of documents. He was so incompetent that Mortimer Gelston, no friend of our cause, chewed him out at a CSC hearing for his bungling, and I fired him in the CSC hallway. Later on I learned that Ainesworth’s law firm did business with GE and understood that the “incompetence” was sabotage. Now, the Toxics Action Center has appeared out of nowhere to present itself as a resource to the Oxford Greens community. What, if any, is CPV Towantic’s relationship to this “environmentalist” group?

Response:

CPV objects to this interrogatory on the following grounds:

1. It levies serious, undocumented and irrelevant allegations of misconduct against parties and intervenors and individuals participating in this docket and/or predecessor dockets, as well as non-participants in these dockets.
2. It contains allegations of “facts” that did not occur and/or whether they occurred or is outside CPV’s knowledge.
3. It seeks information on matters that are not at issue in this docket and not within the scope of the Connecticut Siting Council’s statutory authority under the Act.
4. It attempts to impose discovery obligations on CPV well in excess of those required or authorized by applicable statutes and regulations including Conn. Gen. Stat §§4-177(c) and 4-178, and §16-50j-22a(c) of the Siting Council’s regulations.

Without waiving its objections, CPV responds to this interrogatory as follows: CPV has no relationship with the Toxics Action Center.

Witness: Andrew J. Bazinet

Question Halpern-8:

CPV (the Mother Ship) has represented itself as not wanting to force itself on any community that doesn't want its power plants. Please explain the situation in Hudson Valley NY and the Sierra Club lawsuit.

Response:

CPV objects to this interrogatory on the following grounds:

1. It seeks information on matters that are not at issue in this docket and not within the scope of the Connecticut Siting Council's statutory authority under the Act.
2. It attempts to impose discovery obligations on CPV well in excess of those required or authorized by applicable statutes and regulations including Conn. Gen. Stat §§4-177(c) and 4-178, and §16-50j-22a(c) of the Siting Council's regulations.

Witness: Andrew J. Bazinet

Question Halpern-9:

The citizens of this region have been advised for almost 20 years that our limited, often volunteer emergency services will not be available for power plant disasters, that such events will be considered HAZMAT and left to burn themselves out. Please provide detailed plans regarding the emergency responses CPV Towantic will have in place to respond to such emergencies without impacting the local resources.

Response:

CPV objects to this interrogatory on the following ground:

1. It contains allegations of "facts" that did not occur and/or whether they occurred or outside CPV's knowledge.

Without waiving its objection, CPV responds as follows: Please see pages 52-54 of the transcript of the January 15, 2015 afternoon hearing.

Witness: N/A

Question Halpern-10:

Please provide a comprehensive list of all the amendments and accommodations rendered at CPV Townatic's request by the officials of the town of Oxford regarding tax payments, performance deadlines, P&Z mandates and Inland Wetlands, Board of Finance.

Response:

CPV objects to this interrogatory on the following grounds:

1. It seeks information on matters that are not at issue in this docket or within the scope of the Connecticut Siting Council's statutory authority under the Act.
2. It attempts to impose discovery obligations on CPV well in excess of those required or authorized by applicable statutes and regulations including Conn. Gen. Stat §§4-177(c) and 4-178, and §16-50j-22a(c) of the Siting Council's regulations.

Witness: Andrew J. Bazinet

Question Halpern-11:

At the recent public hearing at Oxford High School, it took about a dozen CPV Towantic staffers – with high-test laptops, no less – to NOT know the answers to a good number of what should have been pretty straightforward construction questions. It was also apparent the staff at the hearing had to be guided by a CSC member slowly and carefully toward crafting responses regarding the mitigation of a number of environmental deficiencies. This leads me to my two final questions: 1. Are the people we, the citizens of Oxford and the surrounding communities, are really meeting the CPV Towantic functionaries who can make decisions and commitments to the public and who will personally stand by those commitments, or are all those presentations just blather and PR? 2. Are the statutory limits of CSC oversight and inspection, as well as the demonstrated incapacity of the town of Oxford to say “no” to anything desired by power plant developers, encouraging a laissez-faire, “whatever” mindset regarding actually implementing the mandates set by the CSC?

Response:

CPV objects to this interrogatory on the following grounds

1. It contains allegations of “facts” that did not occur.
2. It seeks information on matters that are not at issue in this docket or within the scope of the Connecticut Siting Council’s statutory authority under the Act.

Without waiving its objection, CPV responds as follows: With regard to #1, yes.