

ANDREW W. LORD 860.240.6180 DIRECT TELEPHONE 860.240.5723 DIRECT FACSIMILE ALORD@MURTHALAW.COM

November 15, 2010

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

Re: <u>Docket No. NT-2010; Bridgeport Energy (Petition No. 377)</u>

Dear Ms. Roberts:

I write on behalf of Bridgeport Energy LLC ("Bridgeport Energy"), a subsidiary of LS Power Generation, LLC ("LS Power") to provide you with an original and 15 copies of Bridgeport Energy's responses to the interrogatories addressed to Bridgeport Energy by the Connecticut Siting Council in connection with the above-referenced proceeding.

Please contact me with any questions or requests for additional information. Also, Mr. D. Blake Wheatley, General Manager, is the contact person at Bridgeport Energy. His contact information is included in the Service List for this docket.

Sincerely.

Andrew W. Lord

Enclosure

cc: Mr. D. Blake Wheatley

Service List

BOSTON

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

REOPENING OF FINAL DECISIONS
PURSUANT TO C.G.S. §4-181a(b) FOR
JURISDICTIONAL NATURAL GAS FIRED
ELECTRIC GENERATING FACILITIES UNDER
C.G.S. § 16-50i(a)(3) AND C.G.S. §16-50k(a)
LIMITED TO COUNCIL CONSIDERATION OF
CHANGED CONDITIONS AND THE
ATTACHMENT OF CONDITIONS TO THE

CERTIFICATES AND DECLARATORY
RULINGS CONSISTENT WITH THE
FINDINGS AND RECOMMENDATIONS IN

THE FINAL REPORT ISSUED BY THE KLEEN ENERGY PLANT INVESTIGATION REVIEW PANEL (NEVAS COMMISSION)

AND THE FINDINGS AND

RECOMMENDATIONS IN THE EXECUTIVE

REPORT ISSUED BY THE THOMAS

COMMISSION

DOCKET NO. NT-2010

November 15, 2010

BRIDGEPORT ENERGY, LLC RESPONSES TO NT-2010 INTERROGATORIES GENERATORS

1. If the facility has already been constructed, what versions of the NFPA standards were utilized?

Bridgeport Energy was constructed during 1998 and 1999. The specific versions of the NFPA would require some time to verify and document but it is safe to say that no version was later than 1999.

2. If the facility has yet to be constructed, what versions of the NFPA standards will be utilized?

Not applicable. Facility already constructed.

3. How would recommendation #6, "Recommendation as to adoption of codes" in the Thomas Commission Executive Report affect the facility?

The adoption of codes would have no impact on Bridgeport Energy.

- 4. How would the following codes affect construction or modification of the facility:
 - a. NFPA 37 (2010 edition);
 - b. NFPA 54 (2009 edition);
 - c. NFPA 54 Temporary Interim Amendment 09-3 (August 25, 2010);
 - d. NFPA 850 (2010 edition);
 - e. NFPA 853 (2010 edition);
 - f. ASME B31; and
 - g. ASME B31.1 Appendices IV and V.

Given that modifications to the facility would always incorporate the latest standards and requirements, Bridgeport suggests the codes above will have no impact.

5. What is useful lifespan of the natural gas piping/pipelines located within and to the facility?

It is the expectation that the Natural gas piping will have a useful life in excess of the useful life of the facility as a whole. Nominally in excess of 30 years.

6. Would the natural gas piping/pipelines within and to the facility need to be replaced during the life of the facility?

Gas piping within the Facility would not generally be expected to require replacement.

7. Do you foresee any circumstances that would require replacement of a section of natural gas piping/pipeline within and to the facility?

Not at this time.

8. If so, would a new section of natural gas piping/pipeline within and to the facility be installed and require cleaning?

The need to clean any replaced section of gas piping would be dependent on the specifics of the replacement – extent of replacement, welded joints, flanged joints, etc.

9. What type of material is the natural gas piping/pipeline within and to the facility composed of?

Natural gas piping material is schedule 40 carbon steel, grade SA-106B.

10. How many linear feet of natural gas piping/pipeline are located within and to the facility?

The linear feet of gas piping owned by Bridgeport Energy, LLC is approximately 1,500 feet.

11. What is operating pressure (psig) of the natural gas piping/pipeline within and to the facility?

The operating pressure is a maximum of 600 psig.

12. What is the nominal pipe size in inches within and to the facility?

The nominal pipe diameter is 10 inches.

13. What is the length in feet of piping/pipeline that requires/required purging within and to the facility?

No further cleaning is anticipated at this time.

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant Dockets 54 and 54A	U.S. Mail	O'Brien Energy Systems, Inc.	Chief Executive Officer Resource Management International, Inc. 335 West Baltimore Avenue Media, PA 19063
Applicant Docket 59	☑ U.S. Mail	Capitol District Energy Center Cogeneration Associates 255 Main Street Hartford, CT 06106	Chief Executive Officer Independent Energy Corporation 255 Main Street, 5 th Floor Hartford, CT 06106
Applicant Dockets 60 and 60A	☑ U.S. Mail	Chief Executive Officer Flagg Energy Development Corporation One Research Parkway Meriden, CT 06450-7124\	
Applicant Dockets64, 64A and 64B	U.S. Mail	Chief Executive Officer Advanced Manufacturing C.H. Dexter Division The Dexter Corporation One Elm Street Windsor Locks, CT 06096	Chief Executive Officer Independent Energy Corporation 255 Main Street, 5 th Floor Hartford, CT 06106 Chief Executive Officer Environmental Risk, LTD 120 Mountain Avenue Bloomfield, CT 06002
			Duncan MacKay, Esq. Legal Department Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270

Status Caratal	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Applicant Docket 189	⊠ U.S. Mail	Lake Road Generating Company, L.P.	Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29 th Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-5723 — fax alord@murthalaw.com
			James T. Carlton, Jr. Lake Road Generating Co., L.P. 56 Alexander Parkway Dayville, CT 06241
Applicant Docket 192	☑ U.S. Mail	Towantic Energy, LLC	John W. Cannavino Cummings & Lockwood LLC Six Landmark Square Stamford, CT 06901 (203) 351-4447 (203) 708-3849 –fax jcannavino@cl-law.com
			Janis G. Lipman President Towantic Energy, L.L.C. 16 Beachside Common Westport, CT 06880 w: (203) 221-7520
Party Docket 192	☑ U.S. Mail	Citizens for Defense of Oxford	Jay Halpern – CDO 58 Jackson Cove Road Oxford, CT 06478 h: 203-888-4976
Intervenor Docket 192	⊠ U.S. Mail	Town of Middlebury	Richard G. Montville Administrative Aide to First Selectman Town of Middlebury 1212 Whittemore Road, P.O. Box 392 Middlebury, CT 06762 w: (203) 758-2439 f: (203) 758-8629

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Intervenor Docket 192	⊠ E-mail	The Connecticut Light & Power Company	Duncan MacKay, Esq. Legal Department Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3495 mackadr@nu.com Dorian E. Hill, Principal Engineer Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270
Party Docket 192	☑ U.S. Mail	Town of Oxford	The Honorable Mary Ann Drayton-Rogers First Selectman Town of Oxford 486 Oxford Road Route 67 Oxford, CT 06478-1298 w: (203) 888-2543 f: (203) 888-2136
Intervenor Docket 192	⊠ E-mail	Yankee Gas Services Company	John R. Morissette Manager – Transmission Siting and Permitting Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 morisjr@nu.com
Party Docket 192	☑ U.S. Mail	Naugatuck Valley Chapter Trout Unlimited	Albin Weber President Naugatuck Valley Chapter Trout Unlimited 584 South Britain Road Southbury, CT 06488 w: (203) 262-8558 f: (203) 264-1976

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Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Intervenor DO 192		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 Jmalcynsky@gaffneybennett.com pclarke@gbact.com
Intervenor Docket 192	☑ U.S. Mail	Town of Southbury	The Honorable H. Williams Davis, Jr. First Selectman Southbury Town Hall 501 Main Street South Southbury, CT 06488-2295 w: (203) 796-5000 f: (203) 264-9762
Party Docket 192	U.S. Mail	Pomperaug River Watershed Coalition	Marc J. Taylor, MD Pomperaug River Watershed Coalition P.O. Box 814 Southbury, CT 06488-0814 w: (203) 264-5098 f: (203) 264-6332
Petitioner Petition 352	⊠ E-mail	The Connecticut Light & Power Company	Duncan MacKay, Esq. Legal Department Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3495 mackadr@nu.com

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Status Granted	Document Service	Status Holder (name, address & phone number)	Representative
Party Petition 352	☐ U.S. Mail	Scott M. Allen 436 Bridgeview Place Stratford, CT 06497 (W)(203) 316-3671 (H)(203) 378-9081	(name, address & phone number)
Petitioner Petition 451	⊠ U.S. Mail	PPL Wallingford Energy, LLC	Lee Hoffman, Esq. Pullman & Comley, LLC 90 State House Square Hartford, CT 06103-3702 (860) 424-4315 (860) 424-4370 lhoffman@pullcom.com
Petitioner Petition 546	⊠ E-mail	Pratt & Whitney	Kenneth C. Baldwin, Esq. Robinson & Cole LLP' 280 Trumbull Street Hartford, CT 06103-3597 860-275-8299 860-275-8345 kbaldwin@rc.com
Petitioner Petition 902	⊠ E-mail	Pratt & Whitney	Kenneth C. Baldwin, Esq. Robinson & Cole LLP' 280 Trumbull Street Hartford, CT 06103-3597 860-275-8299 860-275-8345 kbaldwin@rc.com
Petitioner Petition 563	⊠ E-mail	The Torrington Company	Philip M. Small Brown Rudnick Freed & Gesmer CityPlace I, Floor 38 185 Asylum Street Hartford, CT 06103-3402 (860) 509-6500 (860) 509-6501 – fax psmall@brownrudnick.com

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Petitioner Petition 778	⊠ U.S. Mail	Connecticut Municipal Electric Energy Cooperative (CMEEC)	Philip L. Sussler, Esq. General Counsel, Connecticut Municipal Electric Energy Cooperative 30 Stott Avenue Norwich, CT 06360 psussler@cmeec.org
Petitioner Petition 805	⊠ E-mail	Ansonia Generation, LLC	Philip M. Small, Esq. Michael E. Kozlik, Esq. Brown Rudnick Berlack Israels LLP CityPlace I, 185 Asylum Street Hartford, CT 06103-3402 (860) 509-6500 (860) 509-6501 – fax psmall@brownrudnick.com mkozlik@brownrudnick.com
			Raymond McGee Ansonia Copper & Brass, Inc. Ansonia Generation LLC 75 Liberty Street Ansonia, CT 06401 (203) 732-6673 (203) 735-3787 fax rmcgee@ansoniacb.com
			Ted W. Verrill Sasco River Advisors LLC 75 Sasco River Lane Southport, CT 06890 (203) 292-3798 (636) 594-3798 fax tverrill@gmail.com
Party Petition 805	⊠ E-mail	The United Illuminating Company	Bruce L. McDermott, Esq. Wiggin and Dana LLP One Century Tower P.O. Box 1832 New Haven, CT 06508-1832 (203) 498-4340 (203) 782-2889 – fax bmcdermott@wiggin.com

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Petitioner Petition 813	⊠ E-mail	Kimberly-Clark Corporation	Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 (860) 275-8299 fax kbaldwin@rc.com Charles L. Smith Maintenance & Engineering Team Leader New Milford Facility 58 Pickett District Road New Milford, CT 06776
Petitioner Petition 831	⊠ E-mail	Waterbury Generation, LLC	Joey Lee Miranda, Esq. Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 (860) 275-8299 fax kbaldwin@rc.com jmiranda@rc.com
Intervenor Petition 831	⊠ E-mail	The Connecticut Light & Power Company	Robert S. Golden Jr. Carmody & Torrance LLP P.O. Box 1110 Waterbury, CT 06721 203-573-1200 203-575-2600 rgolden@carmodylaw.com

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Status Granteu	Service	(name, address & phone number)	(name, address & phone number)
Intervenor Petition 831	⊠ E-mail	The Connecticut Light & Power Company	Robert Carberry, P.E. Manager, Transmission Siting and Permitting Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 P: 860-665-6774 carbere@nu.com
	⊠ U.S. Mail		Stella Pace Transmission Interconnection Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 860-665-5426 860-665-2820
	☑ U.S. Mail		Vincent P. Pace Senior Counsel Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 860-665-5426 860-665-5504
Petitioner Petition 841	☑ U.S. Mail	Bridgeport Energy II, LLC	D. Blake Wheatley General Manager LS Power Development 400 Chesterfield Center, Suite 110 St. Louis, MS 63017 636-532-2200 Mark R. Sussman, Esq. Murtha Cullina, LLP CityPlace I, 29 th Floor 185 Asylum Street Hartford, CT, 06103-3469
			Hartford, CT 06103-3469 860-240-6180-p 860-240-6150-f msussman@murthalaw.com

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Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Status Granteu	Service	(name, address & phone number)	(name, address & phone number)
Party Petition 841	⊠ U.S. Mail	60 Main Street, et al	Julie Kohler, Esq. Cohen and Wolf, P.C. 1115 Broad Street Bridgeport, CT 06604 203-368-0211 jkohler@cohenwolf.com
Intervenor Petition 841	⊠ E-mail	The United Illuminating Company	Bruce L. McDermott Wiggin and Dana LLP One Century Tower New Haven, CT 06508-1832 203-498-4340 203-782-2889 regulatory@wiggin.com
	⊠ E-mail		Linda L. Randell Senior Vice President General Counsel and Corporate Secretary UIL Holdings Corporation P.O. Box 1564 New Haven, CT 06506-0901 203-499-2575 Linda.randell@uinet.com
	☑ U.S. Mail		John J. Prete Vice President of Transmission Business The United Illuminating Company P.O. Box 1564 New Haven, CT 06506-0901 john.prete@uinet.com
Party Petition 841	U.S. Mail	Michael Mauzerall M&M Fence & Wire Works	Robert T. Rosati, Esq. Rosatie & Rosati 3241 Main Street Stratford, CT 06614 203-377-6187 203-386-9570

	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Petitioner Petition 843	☑ U.S. Mail	NRG Energy, Inc.	Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29 th Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-5723 – fax alord@murthalaw.com
			Julie L. Friedberg General Counsel – Northeast Region NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540-6213 (609) 524-5232 (609) 240-1160 - cell (609) 524-4941 - fax Julie.friedberg@nrgenergy.com
Petitioner Petition 870	☑ U.S. Mail	The Hartford Steam Company	Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29 th Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-5723 – fax alord@murthalaw.com
Petitioner Petition 875	U.S. Mail	GenConn Energy, LLC	Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29 th Floor 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 (860) 240-5723 – fax alord@murthalaw.com
			Julie L. Friedberg General Counsel – Northeast Region NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540-6213 (609) 524-5232 (609) 240-1160 - cell (609) 524-4941 - fax Julie.friedberg@nrgenergy.com

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Petitioner Petition 925	⊠ E-mail	PSEG Power Connecticut, LLC	Stephen J. Humes, Esq. McCarter & English, LLP CityPlace I, 185 Asylum St., 36 th Floor Hartford, CT 06103 (860) 275—6761 (860) 560-5955 - fax shumes@mccarter.com
	☑ U.S. Mail		Leilani M. Holgado, Esq. Assistant General Environmental Counsel PSEG Services Corporation 80 Park Plaza, T5C Newark, NJ 07102 (973) 430-5521 (973) 802-1267 - fax Leilani.holgado@pseg.com
	☑ U.S. Mail		Stephen T. Maginnis Project Manager PSEG Power LLC 80 Park Plaza Newark, NJ 07102 (973) 430-8920 Stephen.maginnis@pseg.com
Petitioner Petition 482	☑ U.S. Mail	HEC, Inc.	Anthony M. Fitzgerald, Esq. Carmody & Torrance LLP P.O. Box 1950 New Haven, CT 06509 (203) 777-5501 afitzgerald@carmodylaw.com
Petitioner Petition 553	☑ U.S. Mail	Town of South Windsor	Brad N. Mondschein, Esq. Updike, Kelly & Spellacy, P.C. One State Street, 24 th Floor Hartford, CT 06123-1277 Lynn Banis, Esq. UTC Fuel Cells, LLC 195 Governor's Highway South Windsor, CT 06074

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Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Petitioner Petition 598	U.S. Mail	Yale University	Mr. Viktor Boed, C.E.M., Manager Yale University Office of Facilities/Plant Engineering 2 Whitney Avenue, P.O. Box 208297 New Haven, CT 06520-8297
Petitioner Petition 619	☑ U.S. Mail	Select Energy Services, Inc.	Brad N. Mondschein Updike, Kelly & Spellancy, P.C. One State St., P.O. Box 231277 Hartford, CT 06123
Petitioner Petition 647	☑ U.S. Mail	Nxegen, Inc.	Brad N. Malicki, Esq. Nxegen, Inc. 362 Industrial Park Road, Suite 7 Middletown, CT 06457
Petitioner Petition 696	⊠ U.S. Mail	Johnson Controls, Inc.	James C. Brisbin Sr. Project Manager Johnson Controls Inc. 21 Griffin Road North, Suite 4 Windsor, CT 06095
Petitioner Petition 711	☑ U.S. Mail	PPL Energy Services Holding, LLC	John J. Mazzali Project Engineer PPL Distributed Generation LLC 50 Inwood Road Rocky Hill, CT 06067
Petitioner Petition 785	☑ U.S. Mail	Bridgeport Fuel Cell Park	John A. DeTore, Esq. Rubin and Rudman LLP 50 Rowes Wharf Boston, MA 02110

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LIST OF PARTIES AND INTERVENORS <u>SERVICE LIST</u>

St. A. G. A.	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Party Petition 785	U.S. Mail	City of Bridgeport	Melanie J. Howlett, Esq. Associate City Attorney Office of the City Attorney 999 Broad Street Bridgeport, CT 06604-4328 (203) 576-7647 (860) 576-8252
Intervenor Petition 785	☑ U.S. Mail	The United Illuminating Company	Richard Reed The United Illuminating Company 801 Bridgeport Avenue Shelton, CT 06484 (203) 926-4500 (203) 926-4457 rich.reed@uinet.com
	⊠ E-mail		Bruce L. McDermott, Esq. Cecile M. Fraser, Esq. Wiggin and Dana, LLP One Century Tower New Haven, CT 06508-1832 (203) 498-4322 (203) 782-2889 bmcdermott@wiggin.com
Petitioner Petition 957	⊠ E-mail	Bridgeport Fuel Cell Park, LLC	Joey Lee Miranda, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 (860) 275-8299 fax jmiranda@rc.com
Petitioner Petition 810	U.S. Mail	City of Middletown	Jennifer D. Janelle, Esq. Shipman & Goodwin LLP One Constitution Plaza Hartford, CT 06103-1919

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Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Petitioner Petition 828	⊠ E-mail	DFC-ERG Milford, LLC	Joey Lee Miranda, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 (860) 275-8299 fax jmiranda@rc.com
Petitioner Petition 847	⊠ U.S. Mail	Pepperidge Farm, Inc.	Thomas E. Rieth, Manager Infrastructure an Environmental Engineering Pepperidge Farm, Inc. 595 Westport Avenue Norwalk, CT 06851-4482
Petitioner Petition 921	⊠ E-mail	DFC-ERG CT, LLC	Joey Lee Miranda, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 (860) 275-8299 fax jmiranda@rc.com
Petitioner Petition 922	⊠ E-mail 1	DFC-ERG CT, LLC	Joey Lee Miranda, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 (860) 275-8299 fax jmiranda@rc.com
Petitioner Petition 923	⊠ E-mail	Fuel Cell Energy, Inc.	Joey Lee Miranda, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 (860) 275-8299 fax jmiranda@rc.com

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Status Cuantad	Document	Status Holder	Representative
Status Granted	Service	(name, address & phone number)	(name, address & phone number)
Petitioner Petition 943	U.S. Mail	UTC Power Corporation	Michael O. Brown Vice President Government Affairs & General Counsel UTC Power Corporation 195 Governor's Highway South Windsor, CT 06074 Michael.brown@utcpower.com
Petitioner Petition 948	⊠ U.S. Mail	UTC Power Corporation	Michael O. Brown Vice President Government Affairs & General Counsel UTC Power Corporation 195 Governor's Highway South Windsor, CT 06074 Michael brown@utcpower.com
Petitioner Petition 949	☑ U.S. Mail	UTC Power Corporation	Michael O. Brown Vice President Government Affairs & General Counsel UTC Power Corporation 195 Governor's Highway South Windsor, CT 06074 Michael.brown@utcpower.com
Petitioner Petition 953	☑ U.S. Mail	UTC Power Corporation	Michael O. Brown Vice President Government Affairs & General Counsel UTC Power Corporation 195 Governor's Highway South Windsor, CT 06074 Michael.brown@utcpower.com
Petitioner Petition 961	U.S. Mail	UTC Power Corporation	Michael O. Brown Vice President Government Affairs & General Counsel UTC Power Corporation 195 Governor's Highway South Windsor, CT 06074 Michael.brown@utcpower.com