

CONNECTICUT SITING COUNCIL

DOCKET NO. 192B - CPV Towantic, LLC Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need based on changed conditions pursuant to Connecticut General Statutes §4-181a(b) for the construction, maintenance and operation of a 785 MW dual-fuel combined cycle electric generating facility located north of Prokop Road and Towantic Hill Road intersection in the Town of Oxford, CT

: DOCKET 192B

: December 22, 2014

PRE-HEARING SUBMITTAL OF THE POMPERAUG RIVER WATERSHED COALITION

I. Witness List

The Pomperaug River Watershed Coalition (“PRWC”) witness for this proceeding will be Mr. Leendert (Len) T. DeJong, Executive Director, PRWC.

II. Subjects of Pre-Filed Testimony

PRWC is planning for its pre-filed testimony to address the potential impact on the water resources within the Pomperaug River Watershed attributed to the out-of-basin water supply demands for the proposed CPV Towantic, LLC (“Towantic”) generating facility.

III. Administrative Notice Documents or Exhibits

“Assessment and Restoration of Instream Habitat for the Pomperaug, Nonnewaug and Weekepeemee Rivers of Connecticut” – Northeast Instream Habitat Program, University of Massachusetts, January 2007

[http://www.academia.edu/710338/Assessment and restoration of instream habitat for the Pomperaug Nonnewaug and Weekepeemee Rivers of Connecticut](http://www.academia.edu/710338/Assessment_and_restoration_of_instream_habitat_for_the_Pomperaug_Nonnewaug_and_Weekepeemee_Rivers_of_Connecticut)

“Estimation of the Effects of Land Use and Groundwater Withdrawals on Streamflow for the Pomperaug River, Connecticut” – U.S. Department of the Interior and U.S. Geological Survey Scientific Investigations Report 2010-5114

http://www.pomperaug.org/#!/effects-of-land-use-and-groundwater/zoom/c1h6v/image_2r

PPWC reserves 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.

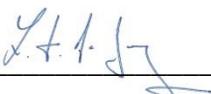
IV. Interrogatories to CPV Towantic, LLC

1. What has been the outcome of your discussions with the Heritage Village Water Company (“HVWC”) to maintain the previously proposed limit of daily withdrawal to 152 gpm or 218,880 gpd from the Pomperaug aquifer for the operating life of the facility as discussed in Section 4.1.2.1 of “Environmental Overview in Support of Petition for Changed Conditions”?
2. Explain how the facility will meet the 663 to 712 gpm (954,720 to 1,025,280 gpd) water demands when fueled by ULSD while conforming to the withdrawal limit referenced in the aforementioned interrogatory. If interconnect agreements are to be relied upon from other water utilities to meet these demands, will HVWC be able to secure those agreements and the required diversion permits for the operating life of the facility?
3. Over the period of an operating year, please explain how CPV Towantic will limit additional water demands for ULSD fueled operation to the winter months (November – March) and only to 720 hours within that time period. Is it correct to state that the applicant will rely on natural gas contracts to minimize the use of ULSD and the higher demand for water?

Respectfully submitted,

The Pomperaug River Watershed Coalition

BY: _____


Leendert T. DeJong
Executive Director