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AN APPLICATION BY TOWANTIC ENERGY, LLC : DOCKET NO. 192
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 : NOVEMBER 7, 2014
TOWANTIC HILL ROAD INTERSECTION IN THE
TOWN OF OXFORD, CONNECTICUT

**MOTION TO INTERVENE BY THE BOROUGH OF NAUGATUCK AND
BOROUGH OF NAUGATUCK WATER POLLUTION CONTROL AUTHORITY**

Pursuant to Conn. Gen. Stat. § 4-177a, and § 16-50j-15a of the Regulations of Connecticut State Agencies, the Borough of Naugatuck (hereinafter referred to as the "Borough") and the Borough of Naugatuck Water Pollution Control Authority (hereinafter referred to as "WPCA") hereby move to be designated as intervenors in this proceeding. In support of this motion, the Borough and the WPCA state as follows:

1. The Borough is a political subdivision organized and existing under the laws of the State of Connecticut.
2. The WPCA is a water pollution control authority established by the Borough pursuant to Chapter 103 of the Connecticut General Statutes.
3. The Borough owns the Borough of Naugatuck Wastewater Treatment Plant (WWTP) and the real property on which it is located, consisting generally of buildings, structures,

equipment, roads, grounds, fences, and landscaping appurtenant thereto, utilized for preliminary treatment, primary treatment, secondary treatment, and advanced biological treatment of sewer influent, incineration process filtrate, and community septage, along with the associated sewage collection, pumping, and interceptor system, and the real property on which it is located.

4. The WWTP services the communities of Naugatuck, Middlebury, Oxford, Prospect and Beacon Falls, and the Borough has expended significant monies on improving the WWTP to comply with federal and state requirements and to ensure the cleanliness of the Naugatuck River.
5. The Borough and the WPCA are affected by this proceeding in that the modifications proposed by the petitioner, CPV Towantic, LLC (“Towantic”) in its petition to reopen and modify the decision and order in docket no. 192, may have significant detrimental effects on the operation of the WWTP and its ability to process and treat the unknown amount of effluent from the proposed dual-fuel combined cycle electric generating facility (the “Facility”).
6. It is an important objective of the Borough that it develops general municipal policies that encourage conservation and proactively address environmental issues and improve and protect air, water and natural resources above the current levels. In an effort to meet that objective, the Borough discourages, objects and actively resists efforts by

development, industry or other body to cause pollutants to be expelled into its air or into its water resources that may be deemed harmful to the environment and the general health and quality of life of its residents.

7. As an adjoining community to Oxford, the proposed location of the Facility, the Borough will be significantly affected by the air and water effluent from the Facility, and it is imperative that further study be done to determine the volume, quality and content of the effluent, so as to continue to protect and give meaning to the fundamental tenets of the Borough's policy on conservation, environmental responsibility, and the health and quality of life of its residents.
8. The Borough and the WPCA seek full rights as intervenors in this proceeding, including the rights to conduct discovery, introduce and review evidence, cross-examine witnesses, submit briefs and present argument. Towantic's motion to reopen and modify the decision and order in docket no. 192 proposes to make substantive changes, the effect of which will increase the net nameplate electrical output of the Facility from 512 megawatts to 785 megawatts. It is imperative that these proposed changes be fully and thoroughly examined and studied before the Council approves the modification.
9. The Borough and WPCA's participation in this proceeding is in the public interest, and good cause exists to grant this motion. The Borough and WPCA's participation will not impair the interests of justice or impair the orderly conduct of the proceedings.

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

Edward G. Fitzpatrick, Esq.
Fitzpatrick | Mariano | Santos | Sousa, PC
203 Church Street
Naugatuck, CT 06770
Telephone: 203-729-4555
Facsimile: 203-723-1914
Email: fitz@fmslaw.org

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

Respectfully submitted,

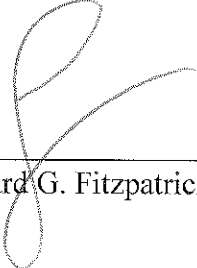
BOROUGH OF NAUGATUCK and
WATER POLLUTION CONTROL AUTHORITY,

BY: 

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

CERTIFICATION

This is to certify that on this 7th day of November, 2014, an original and twenty (20) copies of the foregoing were delivered by regular mail to The Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051, and one copy was served on all other intervenors and parties on the attached list by way of regular U.S. mail.



Edward G. Fitzpatrick, Esq.

**LIST OF PARTIES AND INTERVENORS
SERVICE LIST**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	CPV Towantic Energy, 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 fderosa@brownrudnick.com psmall@brownrudnick.com
Party	Jay Halpern 58 Jackson Cove Road Oxford, CT 06478 h: 203-888-4976 zoarmonster@sbcglobal.net	
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 Dangelo.middlebury@snet.net
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 gibels@nu.com 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 morisjr@nu.com

**LIST OF PARTIES AND INTERVENORS
SERVICE LIST**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	CL&P continued...	<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 bernacr@nu.com</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 pacess@nu.com</p>
Party	Town of Oxford	<p>Francis A. Teodosio, Esq. Winnick, Vine, Welch & Teodosio, LLC 481 Oxford Road Oxford, CT 06478 fteodosio@wvwtlaw.com (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 johnnytroutseed@chartrncr.net</p>
Intervenor	Town of Southbury	<p>Ed Edelson First Selectman Town of Southbury 501 Main Street Southbury, CT 06488 selectman@southbury-ct.gov (203) 262-0647 (203) 264-9762 -- fax</p>
Party	The Pomperaug River Watershed Coalition	<p>James Belden, Executive Director Pomperaug River Watershed Coalition 39 Sherman Hill Road, C103 Woodbury, CT 06798 203-263-0076 info@pomperaug.org</p>

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SERVICE LIST

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Intervenor (approved 06/07/06)	Raymond Pietrorazio 764 Charcoal Avenue Middlebury, CT 06762-1311 (203) 758-2413 (203) 758-9519 – fax ray@ctcombustion.com	
Intervenor (approved 10/10/06)	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