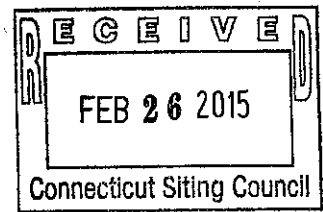


STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL



AN APPLICATION BY TOWANTIC ENERGY, LLC
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
TOWANTIC HILL ROAD INTERSECTION IN THE
TOWN OF OXFORD, CONNECTICUT

DOCKET NO. 192B

FEBRUARY 24, 2015

ORIGINAL

INTERROGATORIES BY MARIAN R. LARKIN, INDIVIDUALLY
AND ON BEHALF OF GREENFIELDS, LLC,
DIRECTED TO CPV/TOWANTIC, LLC

1. What does the word local mean? What distance best describes local?
2. Would you say the Larkin acreage is local? Assuming so, what will the positive impacts and the negative impacts of your 805 MW power plant be on our acreage?
3. Do you consider the stated \$34 of annual savings to us, the local rate payers receiving the brunt of this plant effects, as worth the impositions of your power plant?
4. What is the impact of the billion dollar income this plant will generate for the benefit of its owners?
5. With annual income of this magnitude, do you think this project is more about the money than anything else, particularly since the power isn't needed here in Connecticut nor is it to be utilized here in Connecticut?
6. Where will the plant's power be sold?
7. Why did you attempt to build a power plant in Walpole, Massachusetts?
8. How many megawatts was that proposed plant to be?
9. Why not 805 megawatts at that location?
10. What were the reasons why you did not succeed in permitting a plant in Walpole, Mass.?

11. Would it be correct to say Towantic is to provide the power where the failed CPV plant in Walpole, Massachusetts, being south and west of Boston, would have?

12. Did you exhaust other possible locations for the plant in Massachusetts or Rhode Island considering that is your targeted customer base?

13. Did you consider New Hampshire or Vermont?

14. What is the complete list of towns you considered in Massachusetts and Rhode Island and elsewhere?

15. What are the multiple reasons, please list them by location, why these locations were not suitable?

16. Why was your application turned down in Walpole?

17. What are the differences between attempting to permit a plant in Massachusetts versus permitting a power plant in Connecticut?

18. What about cumulative local impacts? What do you take into account? How about air and noise pollution from I-84? Noise from vehicle engines, truck brakes and from shifting? What about air pollution from all sources and noise from airplanes or helicopters flying overhead, landing, reversing engines, taxi-ing, idling and revving before take off? Have you measured all these things together? What else? Did you consider the long double row of transmission lines with inherent EMF added to the other cumulative effects? Did you or I forget anything? Does your plant exceed standards once added to the above? Is it more or less scenic here with a power plant in view?

19. What is the impact on the scenic southern part of Middlebury? What is the impact on the Historic brown shingled house with red doors, dating from 1774 with significant Revolutionary War history, overlooking a pond built by my grandfather, farmland and forest land, 80 acres worth, donated by my family to the Middlebury Land Trust? What is the impact on the antique barn and house on Wooster Road?

20. What is the plant's impact on the miles and miles of bridle trails on our land linking to the 14 mile Larkin State Bridle Trail?

21. How have you shown me that the above scenic values, historic values and recreational values, which make it desirable to live here, are not negatively impacted by your facility?

22. If it's a fact that the measurement of impact is lower prices in the area of the plant, particularly in those areas with a view of the plant, how have you shown there wouldn't be a negative impact on these and other features?

23. Is Heritage Water Co. limiting your use of its water? In a matter of years, will there be enough drinking water for existing or new residences with your plant in operation, particularly when oil is burned?

24. Let's say there's a lot of residential development 10 or more years from now. Given what you, and all of us now know, about your primary water source, won't drinking water be hard to get for both your plant and the real estate developer? Would development be restricted because of the consumption of your plant? Would a moratorium on new housing, on anything in need of drinking water, be possible?

25. Where will you get the 1 million gallons of drinking water you need to run on oil?

26. Is the lack of water the biggest hurdle in achieving a permit here?

27. Will you be able to locate enough tankers to transport drinking water and oil to the site in Oxford reliably? Is there such a thing as an available tanker truck in times of gas curtailment? Do others compete for tankers to transport oil during a gas curtailment?

28. How costly would these caravans of oil and water be, traipsing to New Haven and back for oil. And the water would be from where? Do these tankers have an impact on Oxford's narrow rural country roads? What about safety and possible spills on snowy, icy, hilly, narrow country roads? Why not shutdown the plant instead?

29. How many gallons of drinking water a day does a 3-4 bedroom home use?

30. If your answer is 300-400 gallons a day, how many homes worth of water would the power plant consume? Would your answer be 3,333+- homes while running on oil? And 612+- homes while running on gas?

31. How many future homes are you possibly preventing from being built? Very possibly the 612 homes, possible on our land, when burning gas and 3,333 homes while burning oil, right?

32. So, what is the economic impact if there's a water shortage or lack of water?

33. Could those 612 homes, needing 218,000 gallons of drinking water a day, be built on our property 5 years from now, ten years from now, if the 218,000 gallons of water necessary was already allotted to your power plant?

34. Does your plan limit the return my family would ordinarily achieve from real estate? From rentals? From house lots or from home sales? Particularly, if the property has a power plant view?

35. Does running on oil, which would deprive over 3,000 homes of water, make sense if the aquifer is already stressed?

36. Do you consider peoples' use and access to plentiful, yet finite, drinking water more important than feeding that same drinking water to a (massive, pollution spewing, airport hazard and view spoiling) power plant that is not even needed? What is the local benefit?

37. Would the Town of Middlebury suffer economic loss from lack of new real estate taxes if drinking water was hard to come by?

38. Would the demographics of this town change? Considering there is no safe level of PM 2.5, do those who care about environmental quality move out of town while those who don't care about environmental quality move in?

39. What is the economic loss of property in close proximity to the plant site and to 5 specific properties as cited by Nocera, Dillon & Diorio, LLC, prepared on September 29, 2000?

40. Because a double row of 125 kv transmission lines pass approximately 2-3 miles through our property to the site, will the EMF increase because of additional power from the plant in the lines?

41. Do you think EMF decreases the residential and recreational value of land in proximity to EMF producing power lines?

42. Last year, CL&P upgraded one set of what they call lattice towers to monopoles; was this done on your behalf?

43. What adjustments does CPV have to request of CL&P to interconnect to the transmission lines?

44. Is CPV entertaining the idea of a third (or fourth turbine?) Would the lines have to be upgraded and would the EMF increase?

45. What are your intentions (the Siting Council and the populace need to know now)?

46. What will have to be done to accommodate a possible 3rd or 4th turbine?

47. Are additional turbines easy to permit?

48. What are the scientifically proven levels of EMF that are a health concern? What scientific study supports your answer?

49. What are the health effects of EMF? What is a safe distance for a home or a human to be from power lines to prevent health problems? Can EMF kill humans?

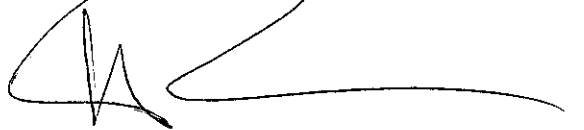
50. Who is financing this plant? A bank? Private investors? Citizens of Connecticut? Citizens of Massachusetts? Citizens of Rhode Island?

51. Does the company compensate for the loss of economic value in peoples' homes and property? Does the company reimburse people for health problems resulting from living in proximity to a power plant?

52. Can CPV be as considerate as CL&P after they installed monopoles through our property, and restored the construction road to as close to its previous condition as possible to enable the continuation of safe horseback riding on its right of way?

53. Will the new access road you plan to build to the plant site impact wetlands? Will you be conducting a study in the spring to reveal the wetlands' crucial secrets?

54. Do you have a copy of, or have you seen a copy of, Michael Klemens' testimony regarding Woodruff Hill and the proposed road? If so, would you please share it?



Marian R. Larkin, Individually and on
Behalf of Greenfields, LLC

CERTIFICATION

I hereby certify that on this 24th day of February, 2015, an original and fifteen (15) 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 following list by way of electronic mail.



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