

## Interrogatories Directed to the Town of Oxford

1. What was the date of the original referendum regarding a power plant in the Town of Oxford?
2. Please provide a copy of that referendum.
3. What was the vote on that referendum?
4. What was the population of the Town of Oxford at that time?
5. How and when was the decision made to change the zoning of Woodruff Hill from residential to industrial?
6. What was the authority for that decision?
7. Please provide a copy of the original Town of Oxford Planning and Zoning Committee (TPZ) minutes at which the original application was approved.
8. Please provide a copy of the TPZ review of the original application.
9. How soon after this decision was made did Towantic Energy LLC apply to build a gas-fired electric generator in Oxford?
10. What was the wording of the 2001 referendum that approved the sale of 20 acres of town owned land to Towantic Energy LLC of Westport?
11. What was the vote on that referendum?
12. Was there an exception to the Zoning regulations made for the proposed power plant? If so, please provide the Planning and Zoning minutes that show this exception.
13. Has Inland Wetlands approved the proposed power plant site? If so, when? Is the permit still in effect? Please provide a copy of the permit.
14. Please describe a general description of all businesses located in the Woodruff Hill Industrial Park area.
15. Did the Town of Oxford have discussions with Timberlake Development Partners LLC regarding the proposed power plant?
16. If so, please provide any and all correspondence related to this matter.
17. Did the Town of Oxford have discussions with Pulte Home Corporation regarding the proposed power plant?
18. If so, please provide any and all correspondence related to this matter.
19. Did the Town of Oxford have any discussion with Pulte Home Corporation regarding the notification of potential homebuyers that a power plant was proposed to be built in Oxford?
20. If so, please provide any and all correspondence related to this matter.
21. Did the Town of Oxford have discussions with Masonicare regarding the proposed power plant?
22. If so, please provide any and all correspondence related to this matter.
23. Is there a contract between the Town of Oxford and CPV regarding the construction of the power plant?
24. If so, please provide a copy of the contract.
25. Have there been any payments from CPV or other interested parties to the Town of Oxford in the form of monetary compensation or goods /services?

26. What representations, either verbal or in writing, has CPV made to Oxford as to future money, goods or services that they will be providing. If so, please provide a list of those payments, complete with dates, amounts and intended purpose.
27. What are the Town of Oxford's emergency plans to respond to an incident at the proposed power plant—such as a fire?
28. What specialized equipment would be necessary to fight a fire or hazmat situation at the proposed power plant?
29. Does the town currently have that equipment? If not, when will it be acquired, and at what cost?
30. Does the Town of Oxford's volunteer fire department have the training to deal with a catastrophe at the proposed plant? If not, when will they receive the training?
31. Is it true that most volunteer fire departments have a policy of "let it burn" for most hazmat situations?
32. Please provide the Agenda for the October 7, 2014 (TPZ) meeting.
33. How is it that CPV was allowed to present at that TPZ meeting without public notice?
34. What action was taken at the TPZ meeting as a result of CPV's presentation. Was a motion made? If so, what was it, and what was the vote?
35. As a result of that meeting, did TPZ send a letter of endorsement to the Connecticut Siting Council (CSC) supporting the Project?
36. Since the Project was not filed with CSC until 11/3/2014 how could TPZ support an unfiled Project?
37. What are the credentials of the members of TPZ. Do any of them have degrees in planning and zoning?
38. Why is there no mention of the power plant project on the Town of Oxford's Plan of Conservation and Development (PCD)?
39. Why is there no mention of the power plant in the 2007 Plan of Industrial Development (PID)?
40. How would a prospective home buyer be aware of the proposed power plant?
41. Considering the lack of mention of the proposed power plant in the PCD and PID what liability for property value diminution rests with the Town of Oxford?