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February 24, 2015

**VIA ELECTRONIC MAIL AND HAND-DELIVERY**

Mr. Robert Stein, Chairman  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

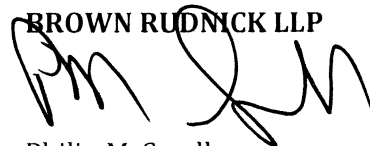
**RE: Docket No. 192B—Towantic Energy, LLC Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need Based on Changed Conditions Pursuant to Connecticut General Statutes §4-181a(b) for the Construction, Maintenance and Operation of a 785 MW Dual-Fuel Combined Cycle Electric Generating Facility Located North of the Prokop Road and Towantic Hill Road Intersection in the Town of Oxford, Connecticut—CPV Towantic, LLC's Interrogatories to the Borough of Naugatuck and the Borough of Naugatuck Water Pollution Control Authority**

Dear Chairman Stein:

Enclosed are an original and fifteen (15) copies of CPV Towantic, LLC's Interrogatories to the Borough of Naugatuck and the Borough of Naugatuck Water Pollution Control Authority.

Please contact Franca L. DeRosa, Esq. or me at (860) 509-6500 with any questions.

Very truly yours,

**BROWN RUDNICK LLP**  


Philip M. Small  
Counsel for CPV Towantic, LLC

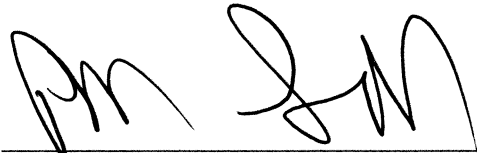
PMS/jmb  
Enclosures  
cc: Service List

61865582 v1-022345/0005



CERTIFICATE OF SERVICE

This is to certify that on this 24th day of February, 2015, the foregoing document was sent via electronic mail, and/or first class mail, to the persons on the attached service list.

By:   
Philip M. Small



**SERVICE LIST OF PARTIES AND INTERVENORS**

<b>Status Granted</b>	<b>Status Holder (name, address &amp; phone number)</b>	<b>Representative (name, address &amp; phone number)</b>
Applicant	CPV Towantic, 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 <a href="mailto:fderosa@brownrudnick.com">fderosa@brownrudnick.com</a> <a href="mailto:psmall@brownrudnick.com">psmall@brownrudnick.com</a>
Party	Jay Halpern 58 Jackson Cove Road Oxford, CT 06478 h: (203) 888-4976 <a href="mailto:zoarmonster@sbcglobal.net">zoarmonster@sbcglobal.net</a>  Peter Thomas 72 Towantic Hill Road Oxford, CT 06478 (203) 720-1536	
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 <a href="mailto:Dangelo.middlebury@snet.net">Dangelo.middlebury@snet.net</a>  Stephen L. Savarese, Esq. 103 South Main Street Newtown, CT 06470 203-270-0077 <a href="mailto:attystephensavarese@gmail.com">attystephensavarese@gmail.com</a>



Intervenor	The Connecticut Light and Power Company (CL&P)	<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 <a href="mailto:gibels@nu.com">gibels@nu.com</a></p> <p>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 <a href="mailto:morisjr@nu.com">morisjr@nu.com</a></p> <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 <a href="mailto:bernacr@nu.com">bernacr@nu.com</a></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 <a href="mailto:paccess@nu.com">paccess@nu.com</a></p> <p>Jeffery D. Cochran Northeast Utilities Service Company 107 Selden Street Berlin, CT 06037 860-665-3548 <a href="mailto:cochrjd@nu.com">cochrjd@nu.com</a></p>
Party	Town of Oxford	<p>Kevin W. Condon, Esq. Condon &amp; Savitt PC P.O. Box 570 Ansonia, CT 06401 203-734-2511 <a href="mailto:condonsavitt@comcast.net">condonsavitt@comcast.net</a></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 <a href="mailto:johnnytroutseed@charter.net">johnnytroutseed@charter.net</a></p>



Intervenor	Town of Southbury	Ed Edelson First Selectman Town of Southbury 501 Main Street Southbury, CT 06488 (203) 262-0647 (203) 264-9762 – fax <a href="mailto:selectman@southbury-ct.gov">selectman@southbury-ct.gov</a>
Party	The Pomperaug River Watershed Coalition	Len DeJong, Executive Director Pomperaug River Watershed Coalition 39 Sherman Hill Road, C103 Woodbury, CT 06798 203-263-0076 <a href="mailto:LDeJong@pomperaug.org">LDeJong@pomperaug.org</a>
Intervenor (approved 06/07/06)	Raymond Pietrorazio 764 Charcoal Avenue Middlebury, CT 06762-1311 (203) 758-2413 (203) 758-9519 – fax <a href="mailto:ray@ctcombustion.com">ray@ctcombustion.com</a>	
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 <a href="mailto:jmalcynsky@gaffneybennett.com">jmalcynsky@gaffneybennett.com</a>
Intervenor (Approved 11/13/14)	Borough of Naugatuck and Borough of Naugatuck Water Pollution Control Authority	Edward G. Fitzpatrick, Esq. Alicia K. Perillo, Esq. Fitzpatrick, Mariano, Santos, Sousa, PC 203 Church Street Naugatuck, CT 06770 203-729-4555 <a href="mailto:Fitz@fmslaw.org">Fitz@fmslaw.org</a> <a href="mailto:Alicia@fmslaw.org">Alicia@fmslaw.org</a>  Ronald Merancy, Chairman Water Pollution Control Authority 229 Church Street Naugatuck, CT 06770 203-720-7000 <a href="mailto:Rjm62159@aol.com">Rjm62159@aol.com</a>
Intervenor (Approved 1/8/15)	Wayne McCormack 593 Putting Green Lane Oxford, CT 06478 <a href="mailto:wayne@waynemccormack.com">wayne@waynemccormack.com</a>	



Intervenor (Approved 1/8/15)	Naugatuck River Revival Group, Inc.	Kevin R. Zak, President Naugatuck River Revival Group, Inc. 132 Radnor Avenue Naugatuck, CT 06770 203-530-7850 <a href="mailto:kznrrg@sbcglobal.net">kznrrg@sbcglobal.net</a>
Intervenor (Approved 1/8/15)	Westover Hills Subdivision Homeowners	Chester Cornacchia Westover Hills Subdivision Homeowners 53 Graham Ridge Road Naugatuck, CT 06770 203-206-9927 <a href="mailto:cc@necsonline.com">cc@necsonline.com</a>
Intervenor (Approved 1/8/15)	Westover School	Kate J. Truini Alice Hallaran Westover School 1237 Whittemore Road Middlebury, CT 06762 203-758-2423 <a href="mailto:ktuini@westoverschool.org">ktuini@westoverschool.org</a> <a href="mailto:ahallaran@westoverschool.org">ahallaran@westoverschool.org</a>
Intervenor (Approved 1/8/15)	Greenfields, LLC and Marian Larkin	Edward S. Hill, Esq. Cappalli & Hill, LLC 325 Highland Avenue Cheshire, CT 06410 203-272-2607 <a href="mailto:ehill@cappalihill.com">ehill@cappalihill.com</a>
Intervenor (Approved 1/8/15)	Lake Quassapaug Association, LLC	Ingrid Manning, Vice President Lake Quassapaug Association, LLC P.O. Box 285 Middlebury, CT 06762 203-758-1692 <a href="mailto:Ingridmanning2@gmail.com">Ingridmanning2@gmail.com</a>
Intervenor (Approved 1/8/15)	Middlebury Land Trust, Inc.	W. Scott Peterson, M.D., President Middlebury Land Trust, Inc. 317 Tranquility Road Middlebury, CT 06762 203-574-2020 <a href="mailto:wsp@aya.yale.edu">wsp@aya.yale.edu</a>
Intervenor (Approved 1/15/15)	Quassy Amusement Park	George Frantzis Quassy Amusement Park P.O. Box 1107 Middlebury, CT 06762 203-758-2913 x108 <a href="mailto:George@quassy.com">George@quassy.com</a>



Intervenor (Approved 1/15/15)	Middlebury Bridle Land Association	Nancy Vaughan Middlebury Bridle Land Association 64 Sandy Hill Road Middlebury, CT 06762 203-598-0697 <a href="mailto:ndzjavaughan@gmail.com">ndzjavaughan@gmail.com</a>
Intervenor (Approved 1/15/15)	Dennis Kocyla 28 Benz Street Ansonia, CT 06401 203-736-7182 <a href="mailto:Dennis3141@yahoo.com">Dennis3141@yahoo.com</a>	
Intervenor (Approved 1/15/15)	Naugatuck Valley Audubon Society	Sophie Zyla Jeff Ruhloff Carl Almonte Naugatuck Valley Audubon Society 17 Stoddard Place Beacon Falls, CT 06403 203-888-7945 <a href="mailto:NVASeditor@mail.com">NVASeditor@mail.com</a>
Intervenor (Approved 1/15/15)	Oxford Flying Club	Burton L. Stevens Oxford Flying Club P.O. Box 371 Woodbury, CT 06798 203-236-5158 <a href="mailto:bstevens@snet.net">bstevens@snet.net</a>

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

CPV TOWANTIC, LLC MOTION TO REOPEN AND : DOCKET NO. 192B  
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 : FEBRUARY 24, 2015  
OPERATION OF A 785 MW DUAL-FUEL COMBINED :  
CYCLE ELECTRIC GENERATING FACILITY LOCATED :  
NORTH OF THE PROKOP ROAD AND TOWANTIC  
HILL ROAD INTERSECTION IN THE TOWN OF  
OXFORD, CONNECTICUT

**CPV TOWANTIC, LLC INTERROGATORIES TO BOROUGH OF NAUGATUCK AND  
BOROUGH OF NAUGATUCK WATER POLLUTION CONTROL AUTHORITY**

CPV Towantic, LLC (“Towantic”), requests that the Borough of Naugatuck (“Borough”) and Borough of Naugatuck Water Pollution Control Authority (“Authority”) respond to the following interrogatories:

1. Does the Borough have a 20-year management contract (beginning August 2012) with Veolia Corporation (“Veolia”) to upgrade and manage its wastewater treatment facility?
2. Provide a copy of all reports provided to the Borough and/or the Authority by Veolia since the beginning of 2013.
3. Provide a copy of all communications since the beginning of 2013 between or among the Borough, the Authority and/or Veolia relating to Towantic’s proposed wastewater discharge.
4. Provide any documents supporting the statement on page 2 of the Borough’s and Authority’s November 7, 2014 Motion to Intervene in this docket “that the modifications proposed by the petitioner [Towantic] ... 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”).”
5. Provide any documents in the Borough’s and/or the Authority’s possession supporting the statement in paragraph 7 on page 3 of their Motion to Intervene that “the Borough will be significantly affected by the ... water effluent from the Facility....”



6. Did the Authority in a regular meeting held on August 21, 2014 unanimously approved a motion to authorize John Batorski to review and approve Towantic's discharge permit application?
7. Explain who Mr. Batorski is and his relationship to the Authority.
8. For the last calendar or fiscal year for which this information is available, provide: (a) a list of the 10 largest dischargers to the Authority's wastewater treatment facility; (b) the quantity of wastewater discharged by each such discharger; and (c) the general nature (e.g., industrial, commercial, municipal, residential) of each of these discharges.
9. For the last calendar or fiscal year for which this information is available, how many wastewater dischargers to the Authority's wastewater treatment facility exceeded the 6,400 gallons per day discharge volume proposed by Towantic?
10. Provide: (a) a list of the last 10 applications for wastewater discharge to the Authority's wastewater treatment facility approved by the Authority; (b) the date of discharge approval by the Authority; (c) the approved or projected annual quantity of each discharge; and (d) the general nature of each of these discharges.
11. Provide (a) a list of the last 10 applications for wastewater discharge to the Authority's wastewater treatment facility rejected by the Authority, (b) the date of the rejection, (c) the reasons for the rejection, (d) the projected annual quantity of each of discharge, and (e) the general nature of each of these discharges.
12. With respect to the January 22, 2015 Authority meeting described in the Borough's January 30, 2015 letter to the Connecticut Siting Council, at which the Authority purportedly rescinded Towantic's discharge authorization, provide the following information and documents:
  - (a) any information or documents provided to the Authority or to any Authority members regarding Towantic's proposed discharge at or before the meeting, including any emails, letters or other communications from Borough officials;
  - (b) the minutes of the meeting;
  - (c) any notice provided to Towantic in which the Authority stated that it was considering rescinding Towantic's discharge authorization at this meeting;
  - (d) any public notice that the Authority issued in which it stated that it was considering rescinding Towantic's discharge authorization.

13. Please articulate in detail the Authority's reason or reasons for attempting to rescind its prior approval of Towantic's wastewater discharge.
14. Since 2000, has the Authority rescinded any wastewater discharge authorizations other than Towantic's? If so, provide a list of the rescinded discharges and a copy of the Authority's minutes explaining the basis for the Authority's actions

Respectfully submitted,

CPV TOWANTIC, LLC

By: 

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