

**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
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 : MARCH 2, 2015

**MOTION FOR EXTENSION OF TIME TO RESPOND TO CPV TOWANTIC, LLC
INTERROGATORIES TO BOROUGH OF NAUGATUCK AND BOROUGH
OF NAUGATUCK WATER POLLUTION CONTROL AUTHORITY**

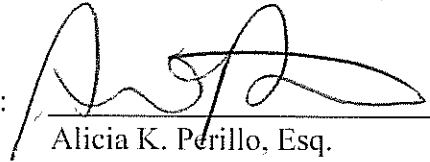
The Borough of Naugatuck (hereinafter referred to as the “Borough”) and the Borough of Naugatuck Water Pollution Control Authority (hereinafter referred to as “WPCA”) hereby request a fourteen (14) day extension of time, up to and including **Friday, March 13, 2015**, in which to respond to the interrogatory questions from CPV Towantic, LLC dated February 24, 2015. Pursuant to the Connecticut Siting Council’s (the “Council”) memo dated February 25, 2015, the final day for the submission of interrogatory responses is Tuesday, March 3, 2015. This deadline affords the Borough and WPCA a mere seven (7) days to prepare its responses.

Accordingly, it is respectfully requested that the Council grant an extension of time to March 13, 2015.

Respectfully submitted,

BOROUGH OF NAUGATUCK and
WATER POLLUTION CONTROL AUTHORITY,

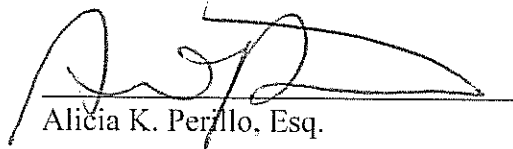
BY:



Alicia K. Perillo, Esq.
Fitzpatrick | Mariano | Santos | Sousa, PC
Its Attorney
203 Church Street
Naugatuck, CT 06770

CERTIFICATION

This is to certify that on this 2nd day of March, 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 attached list by way of electronic mail.



Alicia K. Perillo, Esq.

**LIST OF PARTIES AND INTERVENORS
SERVICE LIST**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
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 fderosa@brownrudnick.com psmall@brownrudnick.com
Party	Jay Halpern 58 Jackson Cove Road Oxford, CT 06478 h: 203-888-4976 zoarmonster@sbcglobal.net Peter Thomas 72 Towantic Hill Rd. 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 Dangelo.middlebury@snet.net Stephen L. Savarese, Esq. 103 South Main Street Newtown, CT 06470 203-270-0077 attystephensavarese@gmail.com
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

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	CL&P continued...	<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 morisjr@nu.com</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 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 paccess@nu.com</p> <p>Jeffery D. Cochran Northeast Utilities Service Company 107 Selden Street Berlin, CT 06037 860-665-3548 cochrjd@nu.com</p>
Party	Town of Oxford	Kevin W. Condon, Esq. Condon & Savitt PC P.O. Box 570 Ansonia, CT 06401 203-734-2511 condonsavitt@comcast.net
Party	Naugatuck Valley Chapter Trout Unlimited	Robert M. Perrella, Vice President TU Naugatuck/Pomperaug Valley Chapter 278 W. Purchase Road Southbury, CT 06488-1004 johnnytroutseed@charter.net

Intervenor	Town of Southbury	Ed Edelson First Selectman Town of Southbury 501 Main Street Southbury, CT 06488 selectman@southbury-ct.gov (203) 262-0647 (203) 264-9762 – fax
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 LDeJong@pomperaug.org
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
Intervenor (Approved on November 13, 2014)	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 Fitz@fmslaw.org alicia@fmslaw.org Ronald Merancy, Chairman Water Pollution Control Authority 229 Church Street Naugatuck, CT 06770 203-720-7000 Rjm62156@aol.com

<p>Intervenor <i>(Approved on January 8, 2015)</i></p>	<p>Wayne McCormack 593 Putting Green Lane Oxford, CT 06478 wayne@waynemccormack.com</p>	
<p>Intervenor <i>(Approved on January 8, 2015)</i></p>	<p>Naugatuck River Revival Group, Inc.</p>	<p>Kevin R. Zak, President Naugatuck River Revival Group, Inc. 132 Radnor Avenue Naugatuck, CT 06770 kznrrg@sbcglobal.net 203-530-7850</p>
<p>Intervenor <i>(Approved on January 8, 2015)</i></p>	<p>Westover Hills Subdivision Homeowners</p>	<p>Chester Cornacchia Westover Hills Subdivision Homeowners 53 Graham Ridge Road Naugatuck, CT 06770 203-206-9927 cc@necsonline.com</p>
<p>Intervenor <i>(Approved on January 8, 2015)</i></p>	<p>Westover School</p>	<p>Kate J. Truini Alice Hallaran Westover School 1237 Whittemore Road Middlebury, CT 06762 203-758-2423 ktruini@westoverschool.org ahallaran@westoverschool.org</p>
<p>Intervenor <i>(Approved on January 8, 2015)</i></p>	<p>Greenfields, LLC and Marian Larkin</p>	<p>Edward S. Hill, Esq. Cappalli & Hill, LLC 325 Highland Avenue Cheshire, CT 06410 203-272-2607 chill@cappalihill.com</p>
<p>Intervenor <i>(Approved on January 8, 2015)</i></p>	<p>Lake Quassapaug Association, LLC</p>	<p>Ingrid Manning, Vice President Lake Quassapaug Association, LLC P.O. Box 285 Middlebury, CT 06762 203-758-1692 Ingridmanning2@gmail.com</p>

Intervenor (Approved on January 8, 2015)	Middlebury Land Trust, Inc.	W. Scott Peterson, M.D., President Middlebury Land Trust, Inc. 317 Tranquility Road Middlebury, CT 06762 203-574-2020 wsp@aya.yale.edu
Intervenor (Approved on January 15, 2015)	Quassy Amusement Park	George Frantzis Quassy Amusement Park P.O. Box 1107 Middlebury, CT 06762 203-758-2913 ext 108 george@quassy.com
Intervenor (Approved on January 15, 2015)	Middlebury Bridle Land Association	Nancy Vaughan Middlebury Bridle Land Association 61 Sandy Hill Road Middlebury, CT 06762 203-598-0697 ndzijaughan@gmail.com
Intervenor (Approved on January 15, 2015)	Dennis Kocyla 28 Benz Street Ansonia, CT 06401 203-736-7182 Dennis3141@yahoo.com	
Intervenor (Approved on January 15, 2015)	Naugatuck Valley Audubon Society	Sophie Zyla Jeff Ruhloff Carl Almonte Naugatuck Valley Audubon Society 17 Stoddard Place Beacon Falls, CT 06403 203-888-7945 NVASeditor@mail.com
Intervenor (Approved on January 15, 2015)	Oxford Flying Club	Burton L. Stevens Oxford Flying Club, Inc. P.O. Box 371 Woodbury, CT 06798 203-236-5158 bstevens@snet.net