

**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, : JANUARY 13, 2015
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

**OBJECTION OF CPV TOWANTIC, LLC TO FILING BY WAYNE MCCORMACK
OF STOP TOWANTIC POWER PETITION**

On January 11, 2015, Wayne McCormack, an intervenor in this proceeding, forwarded to the service list a 59 page petition of Stop Towantic Power, which he had filed with the Connecticut Siting Council (“Council”). CPV Towantic, LLC (“Towantic”) hereby objects to admission of the STP Petition as an exhibit in this proceeding for the reasons described below.

As background, according to media reports, Mr. McCormack is the leader of STP. However, he requested and was granted intervenor status by the Council in his individual capacity, not as the leader of STP. As a result, Mr. McCormack may only participate in this proceeding as an individual and has no authority whatsoever to speak on behalf of STP in this proceeding. Consequently, he may not offer the STP Petition as an exhibit.

Additionally, the STP Petition is not the type of document containing factual information that should be admitted to the evidentiary record. Rather, at best, it constitutes comments by individuals that would normally be included in the public comment section of the Council’s record. However, should the Council choose to treat the STP Petition as public comments, entering the STP Petition into the public comment record would preclude all of the signers from offering additional public comment at the upcoming January 15, 2015 public hearing session.

For the reasons stated in this Objection, Towantic respectfully requests that the Council (1) not admit the STP Petition into the evidentiary record of this proceeding, and (2) if it chooses to treat the STP Petition as public comment, preclude any signatories to the petition from offering additional public comments during the upcoming public comment session.

Respectfully submitted,


CPV TOWANTIC, LLC

By: 

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Its Attorneys

CERTIFICATE OF SERVICE

This is to certify that on this 13th day of January, 2015, the foregoing Proposed Exhibits and Proposed Administrative Notice List was sent, via first class mail and/or electronic mail, to the persons on the attached service list.

By: 
Philip M. Small

61843020 v1-022345/0005

**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 pacess@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	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
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@chartner.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. Fitzpatrick, Mariano, Santos, Sousa, PC 203 Church Street Naugatuck, CT 06770 203-729-4555 Fitz@fmslaw.org Ronald Merancy, Chairman Water Pollution Control Authority 229 Church Street Naugatuck, CT 06770 203-720-7000 Rjm62159@aol.com

Intervenor <i>(Approved on January 8, 2015)</i>	Wayne McCormack 593 Putting Green Lane Oxford, CT 06478 wayne@waynemccormack.com	
Intervenor <i>(Approved on January 8, 2015)</i>	Naugatuck River Revival Group, Inc.	Kevin R. Zak, President Naugatuck River Revival Group, Inc. 132 Radnor Avenue Naugatuck, CT 06770 kznrrg@sbcglobal.net 203-530-7850
Intervenor <i>(Approved on January 8, 2015)</i>	Westover Hills Subdivision Homeowners	Chester Cornacchia Westover Hills Subdivision Homeowners 53 Graham Ridge Road Naugatuck, CT 06770 203-206-9927 cc@necsonline.com
Intervenor <i>(Approved on January 8, 2015)</i>	Westover School	Kate J. Truini Westover School 1237 Whittemore Road Middlebury, CT 06762 203-758-2423 ktruini@westoverschool.org
Intervenor <i>(Approved on January 8, 2015)</i>	Greenfields, LLC	Edward S. Hill, Esq. Cappalli & Hill, LLC 325 Highland Avenue Cheshire, CT 06410 203-272-2607 ehill@cappallihill.com
Intervenor <i>(Approved on January 8, 2015)</i>	Lake Quassapaug Association, LLC	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)</p>	<p>Middlebury Land Trust, Inc.</p>	<p>W. Scott Peterson, M.D., President Middlebury Land Trust, Inc. 317 Tranquility Road Middlebury, CT 06762 203-574-2020 wsp@aya.yale.edu</p>
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