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January 8, 2015

**VIA HAND-DELIVERY AND ELECTRONIC MAIL**

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 Proposed Exhibits and Proposed Administrative Notice List**

Dear Chairman Stein:

Enclosed are an original and fifteen (15) copies of CPV Towantic, LLC's Proposed Exhibits and Proposed Administrative Notice List.

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

61840389 v1-022345/0005

**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 8, 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

**CPV TOWANTIC, LLC’S PROPOSED EXHIBITS AND  
PROPOSED ADMINISTRATIVE NOTICE LIST**

**I. PROPOSED EXHIBITS**

CPV Towantic, LLC (“CPV”) respectfully requests that the Connecticut Siting Council (“Council”) admit the following documents as full exhibits:

1. Petition of CPV Towantic, LLC (f.k.a. Towantic Energy, LLC) to Reopen and Modify the Decision in Docket No. 192 due to changed conditions, dated November 3, 2014.
2. CPV Towantic, LLC’s responses to Connecticut Siting Council interrogatories, dated December 29, 2014.
3. CPV Towantic, LLC’s responses to party and intervenor interrogatories, dated January 8, 2015.

**II. PROPOSED ADMINISTRATIVE NOTICE LIST**

CPV respectfully requests that the Council take administrative notice of the following documents:

**Federal Energy Regulatory Commission**

FEDERAL ENERGY REGULATORY COMMISSION, ISO New England, Inc., 147 FERC ¶61,109 (May 12, 2014) *available at* <http://www.ferc.gov/CalendarFiles/20140512144852-ER14-1477-000.pdf>

FEDERAL ENERGY REGULATORY COMMISSION, ISO New England, Inc., 147 FERC ¶61,173 (May 30, 2014) available at <http://www.ferc.gov/CalendarFiles/20140530161324-ER14-1639-000.pdf>

FEDERAL ENERGY REGULATORY COMMISSION, ISO New England, Inc., 148 FERC ¶61,179 (September 9, 2014) available at <http://www.ferc.gov/CalendarFiles/20140909165718-ER14-2407-000.pdf>

FEDERAL ENERGY REGULATORY COMMISSION, ISO-New England, Inc., 148 FERC §61,201 (September 16, 2014) available at [http://www.eenews.net/assets/2014/09/17/document\\_gw\\_12.pdf](http://www.eenews.net/assets/2014/09/17/document_gw_12.pdf)

DOE Gas-Electric Coordination Quarterly Report to the Commission, Docket No. AD12-12-000, September 19, 2013, available at <http://www.ferc.gov/legal/staff-reports/2013/aug-A-3-report.pdf>

### **Public Utilities Regulatory Authority / Department Of Public Utility Control**

PUBLIC UTILITIES REGULATORY AUTHORITY, *Service Supplied by Water Companies*, Regs. Conn. State Agencies, §§ 16-11-79, available at [http://www.sots.ct.gov/sots/lib/sots/regulations/title\\_16/011.pdf](http://www.sots.ct.gov/sots/lib/sots/regulations/title_16/011.pdf), pp. 28-29.

PUBLIC UTILITIES REGULATORY AUTHORITY, *Certificates of Convenience and Necessity for Small Water Companies, Water Supply Requirements*, Regs. Conn. State Agencies §§ 16-262m-8 (d)(1), (d)(6), available at [http://www.sots.ct.gov/sots/lib/sots/regulations/title\\_16/262m.pdf](http://www.sots.ct.gov/sots/lib/sots/regulations/title_16/262m.pdf), pp. 12-13.

DEPARTMENT OF PUBLIC UTILITY CONTROL, DOCKET NO. 09-10-14, *DPUC Review of Heritage Village Water Company Water Supply Plan – Decision*, November 25, 2009, available at <http://www.dpuc.state.ct.us/dockhist.nsf/8e6fc37a54110e3e852576190052b64d/ad80d376a8dfbfa8852576800064692f?OpenDocument>

DEPARTMENT OF PUBLIC UTILITY CONTROL, DOCKET NO. 91-07-18 PART B, *Joint Investigation of DPUC and The Department Of Health Services Into the Request of Ellsworth Estates Water Company to Abandon Service – Decision*, December 23, 1992, available at <http://www.dpuc.state.ct.us/FINALDEC.NSF/2b40c6ef76b67c438525644800692943/59a1f1acd631380685255fc0006375de?OpenDocument&Highlight=0,91-07-18%20>

DEPARTMENT OF PUBLIC UTILITY CONTROL, DOCKET NO. 90-08-08 PART N, *DPUC Investigation Into the Adequacy of Supply of The Heritage Village Water Company – Decision*, December 18, 1991, available at <http://www.dpuc.state.ct.us/FINALDEC.NSF/2b40c6ef76b67c438525644800692943/c36121686d48f3da85255fbf0070020b?OpenDocument&Highlight=0,90-08-08>

### **Department of Public Health**

STATE OF CONNECTICUT, DEPARTMENT OF PUBLIC HEALTH, *Public Health Code of the State of Connecticut, Reservoir, Ground Water and Water Use Monitoring*, Regs. Conn. State Agencies §§ 19-13-B102 (o), (p), *available at* [http://www.sots.ct.gov/sots/lib/sots/regulations/title\\_19/013b.pdf](http://www.sots.ct.gov/sots/lib/sots/regulations/title_19/013b.pdf), pp. 195-96.

### **ISO New England**

ISO NEW ENGLAND, 2014 Regional Electricity Outlook, *available at* [http://www.iso-ne.com/aboutiso/fin/annl\\_reports/2000/2014\\_reo.pdf](http://www.iso-ne.com/aboutiso/fin/annl_reports/2000/2014_reo.pdf)

ISO NEW ENGLAND, January 2013 memo on “Information Regarding Potential Benefits and Costs of Solutions to Address the Risks Associated with New England’s Reliance on Natural Gas,” *available at* [http://www.iso-ne.com/static-assets/documents/committees/comm\\_wkgrps/strategic\\_planning\\_discussion/materials/natural\\_gas\\_reliance.pdf](http://www.iso-ne.com/static-assets/documents/committees/comm_wkgrps/strategic_planning_discussion/materials/natural_gas_reliance.pdf)

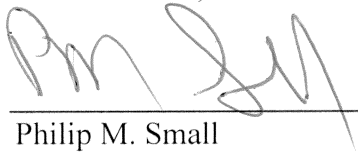
ISO NEW ENGLAND, July 11, 2014 Testimony of Peter T. Brandien, Vice President of System Operations at ISO New England, on Winter 2014-15 Reliability Program *available at* [http://www.iso-ne.com/regulatory/ferc/filings/2014/jul/er14-2407-000\\_win\\_rel\\_pro\\_7-11-2014.pdf](http://www.iso-ne.com/regulatory/ferc/filings/2014/jul/er14-2407-000_win_rel_pro_7-11-2014.pdf), pp. 341-355.

### **University of Connecticut**

Connecticut Center for Economic Analysis, University of Connecticut School of Business, "Predictability of How Single-Family Home Values Respond to a Changing Neighborhood: The Case of Oxford, CT," *available at* [http://ceea.uconn.edu/studies/CCEA-RealEstatePredictability-WhitePaper\\_2014-11-25.pdf](http://ceea.uconn.edu/studies/CCEA-RealEstatePredictability-WhitePaper_2014-11-25.pdf)

Respectfully submitted,

CPV TOWANTIC, LLC

By:  \_\_\_\_\_

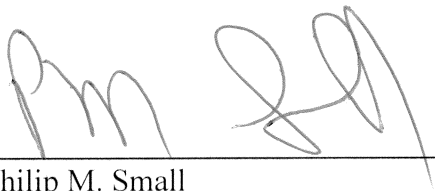
Philip M. Small  
Franca L. DeRosa  
Brown Rudnick LLP  
185 Asylum Street  
Hartford, CT 06103-3402  
Phone: (860) 509-6500  
Fax: (860) 509-6501  
Its Attorneys

CERTIFICATE OF SERVICE

This is to certify that on this 8th 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

Handwritten signature of Philip M. Small in black ink, written over a horizontal line.

61838957 v1-022345/0005

**SERVICE LIST OF PARTIES AND INTERVENORS**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Applicant</b>	Towantic Energy, L.L.C.	John W. Cannavino Cummings & Lockwood LLC Six Landmark Square Stamford, CT 06901 (203) 351-4447 (203) 708-3849 –fax <a href="mailto:jcannavino@cl-law.com">jcannavino@cl-law.com</a>
<b>Party</b>	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	
<b>Intervenor</b>	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>
<b>Intervenor</b>	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 <a href="mailto:gibels@nu.com">gibels@nu.com</a>  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>

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Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	The Connecticut Light and Power Company (CL&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:pacess@nu.com">pacess@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>
<b>Party</b>	Town of Oxford	Francis A. Teodosio, Esq. Winnick, Vine, Welch & Teodosio, LLC 481 Oxford Road Oxford, CT 06478 (203) 881-3600 (203) 881-3606 fax
<b>Party</b>	Naugatuck Valley Chapter Trout Unlimited	Robert M. Perrella, Vice President TU Naugatuck/Pomperaug Valley Chapter 278 W. Purchase Road Southbury, CT 06488-1004 <a href="mailto:johnnytroutseed@chartner.net">johnnytroutseed@chartner.net</a>
<b>Intervenor</b>	Town of Southbury	Ed Edelson First Selectman Town of Southbury 501 Main Street Southbury, CT 06488 (203) 262-0647 (203) 264-9762 – fax
<b>Party</b>	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>



**SERVICE LIST OF PARTIES AND INTERVENORS**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Intervenor (approved 06/07/06)</b>	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>	
<b>Intervenor (approved 10/10/06)</b>	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@gaффneybennett.com">Jmalcynsky@gaффneybennett.com</a> <a href="mailto:pclarke@gbact.com">pclarke@gbact.com</a>
<b>Intervenor (approved on November 13, 2014)</b>	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 <a href="mailto:Fitz@fmslaw.org">Fitz@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>