



February 3, 2015

Melanie Bachman  
Acting Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**Subject: DOCKET 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 §4-181 a(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.**

Dear Attorney Bachman,

The Pomperaug River Watershed Coalition (“PRWC”) filed pre-file testimony for Docket 192B on January 6, 2015 pertaining to Pomperaug River water resource matters for Siting Council consideration. On January 28, 2015 PRWC received from the Siting Council comments submitted by the CT Department of Energy and Environmental Protection (“DEEP”). PRWC respectfully submits this additional testimony in the hopes of clarifying information found within the DEEP comments for the benefit of the Siting Council’s review and for a further understanding of public water supply and aquatic health protection.

In its comments, DEEP recognizes the continued relevancy from the former Docket 192 of the adequacy of water supply during periods of USLD-fired proposed operations. However in presenting its position, DEEP may have inadvertently misstated the status of the Connecticut Water Company (“CWC”) water supply interconnect with the Heritage Village Water Company (“HVWC”). It is PRWC’s understanding that the 315,000 gallon per day (“gpd”) mentioned by DEEP as a transfer to HVWC is actually a water diversion into Middlebury from CWC’s Naugatuck system. We believe that the diversion permit with HVWC as well as CWC’s Sale of Excess Water Permit allows for 500,000 gpd. Furthermore, it is our understanding that CWC has a permit for the transfer of 300,000 gpd into Middlebury from the Waterbury water supply system. We underscore the importance of the above to clarify the availability of alternative water supplies to those proposed to be withdrawn from the Pomperaug basin.

In its comments, DEEP suggests a favorable condition for utilizing HVWC water supply in the winter during periods of low demands (contrasting the unfavorable demand for water in the summer when the river flows are low and HVWC water demands are high). PRWC shares DEEP’s observations about water use in the summer period. Our January 6 testimony provided evidence that the river has in the recent past already experienced actual flows below the “critical flow” identified in our exhibit titled

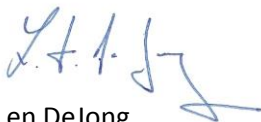
“Assessment and Restoration of Instream Habitat for the Pomperaug, Nonnewaug and Weekepeemee Rivers of Connecticut – Northeast Instream Habitat Program University of Massachusetts”) for aquatic health during the summer “Rearing and Growth” bioperiod. This report was prepared for PRWC and the CT Department of Environmental Protection (now DEEP) and is referred to hereafter as the “UMass Study”.

PRWC also stated in its January 6 testimony that based on the UMass Study, the “Overwintering” bioperiod from December through February requires the highest river flows for aquatic health protection. This is significant in that as DEEP notes, the highest water demands for the proposed facility will likely take place during the winter months. In fact, USGS records show that actual flows were below or nearly below “critical flows” (identified as 31.15 cubic feet per second within Table 11 of the UMass Study) during winter drought periods. Furthermore, USGS aquifer water level measurements for Southbury demonstrate the longer term, lingering impact on groundwater from summer droughts and summer water demands which extend into colder weather periods.

Finally, in its comments DEEP indicates a desire to explore “the feasibility of increasing on-site water supply to extend continuous oil-fired operation beyond the 52 hours of operation” during times of peak natural gas demand.” Should this be considered, it is suggested that it is increasingly imperative that Siting Council further consider alternative water supplies to replace or supplement water drawn from the Pomperaug basin for the proposed facility to limit water demands to those that are identified as being non-threatening to human and aquatic health.

Thank you for the opportunity to submit this additional testimony. As a party to these proceedings, PRWC will endeavor to be quickly responsive to any questions from the Siting Council and all parties and intervenors.

Sincerely,



Len DeJong  
Executive Director

c. Service List

DEEP – Frederick L. Riese