

One State Street
Hartford, CT 06103
Main (860) 275-8200
Fax (860) 275-8299
kbaldwin@rc.com
Direct (860) 275-8345

Also admitted in Massachusetts
and New York

December 17, 2024

Via Electronic and First-Class Mail

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 527 – Application of Windham Energy Center, LLC For A Certificate Of Environmental Compatibility And Public Need For The Construction, Maintenance And Operation Of A Battery Storage Facility at 189 Lake Road, Killingly, Connecticut

Docket No. 470B –NTE Connecticut, LLC for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance and Operation of an Electric Power Generating Facility at 180 and 189 Lake Road, Killingly, Connecticut – *Motion of Windham Energy Center, LLC to Reopen and Modify the Decision in Docket No. 470B Due to Changed Conditions*

Request for Extension

Dear Attorney Bachman:

On behalf of Windham Energy Center (“WEC”), I am writing to ask the Council to extend the December 31, 2024, deadline and give WEC additional time to correct the deficiency in the Docket No. 527 application.

As you are aware, on November 7, 2024, the Council determined that the Docket No. 527 application was “incomplete because it is premature for the Council to review this application due to the existence of a valid Council-issued Certificate of Environmental Compatibility and Public Need (Certificate) for an electric generating facility at 189 Lake Road site” issued to NTE Connecticut LLC (“NTE”) in Council Docket No. 470B. On November 21, 2024, in response to the Council’s Incomplete Notice, WEC provided notice of the Docket No. 527 application to Stephanie Clarkson, the last known principle at NTE and filed a Motion to Reopen and Modify

30954070-v1

Melanie A. Bachman, Esq.
December 17, 2024
Page 2

the Council's decision in Docket No. 470B for the limited purpose of determining the status of the exiting NTE Certificate (the "Motion").

Notice of the Motion was sent to all parties and intervenors in Docket No. 470B, including Stephanie Clarkson at NTE. On November 25, 2024, the Council sent notice to the Docket No. 470B parties and intervenors, asking for "comments and statements of position in writing to the Council with respect to whether the Motion to Reopen should be granted or denied..." to be submitted by January 31, 2025. The Council then announced that the Motion would be placed on the agenda for the Council's regular business meeting on February 6, 2025.

WEC is, therefore, requesting that the December 31, 2024, deadline be extended until the such time as the Council renders a decision on the Motion. Thank you in advance for your assistance and cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth C. Baldwin", with a stylized, flowing script.

Kenneth C. Baldwin