



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

October 17, 2016

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597

RE: **DOCKET NO. 470** – NTE Connecticut, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 550-megawatt dual-fuel combined cycle electric generating facility and associated electrical interconnection switchyard located at 180 and 189 Lake Road, Killingly, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than October 27, 2016. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as send a copy via electronic mail. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Copies of your responses shall be provided to all parties and intervenors listed on the service list, which can be found on the Council's pending proceedings website.

Yours very truly,

Melanie Bachman
Acting Executive Director

MB/MP

c: Parties and Intervenors
Council Members

Docket No. 470
Pre-Hearing Questions for NTE
October 17, 2016
Set Two

Site Question

70. NTE Connecticut, LLC's (NTE or Applicant) response to interrogatory number 1 states that the 63-acre power plant site is located at 180 Lake Road and the 10-acre switchyard site is located at 189 Lake Road. This appears to conflict with page 1 of the Geotechnical Engineering Report (Geotech Report) under Tab C of Volume II of the Application. In Section 1.4 of the Geotech Report, it notes that the 63-acre site is 189 Lake Road, and the 10-acre site is 180 Lake Road. Reconcile this information to confirm the correct addresses of each parcel. Depict these parcels on an abutters' map.
71. The Option Agreement refers to 71.7 acres of combined property area for 180 and 189 Lake Road. However, page 1 of Volume I of the Application (Volume I) notes that it is 63 acres plus 10 acres or a total of 73 acres. Reconcile these numbers.

Notice and Municipal/Public Outreach Questions

72. Did NTE enter into a Community Environmental Benefits Agreement (CEBA), or in the alternative, enter into some other type of agreement related to community benefits? If so, provide.

Alternatives Questions

73. Reference NTE's response to Council interrogatory number six. Compare the capacity factor of the proposed power plant to a typical capacity factor of a solar farm in the Connecticut area. NTE may assume fixed, south-facing solar panels. Is the "load factor" noted in NTE's response to Council interrogatory number 13 equivalent to capacity factor? Explain.
74. Depict the proposed site and the two alternative sites noted on Page 176 of Volume I on an aerial photograph.

Construction Questions

75. Would NTE own the short transmission interconnection between the Killingly Energy Center (KEC) and the Utility Switchyard (as referenced on page 135 of Volume I)? Where would the demarcation point be located that separates the proposed NTE-owned facility and the future Eversource-owned switching station and transmission facilities, e.g. Eversource's (future) utility switchyard transmission terminal structure?
76. Page 166 of Volume I notes that, "There are four interconnections associated with KEC that are anticipated to be permitted, constructed, owned, and operated by others." (Emphasis added). Is it NTE's understanding that, if the power plant project is approved by the Council, Eversource would apply for a separate permit for the natural gas pipeline interconnection with the Council and/or the Federal Energy Regulatory Commission, as applicable? Is it also NTE's understanding that, if the power plant project is approved, Eversource would file a Petition for a declaratory ruling with the Council for the transmission interconnection? If the power plant project is approved, would the off-site water piping and wastewater piping require local approval?

Power Plant Operations Questions

77. Has NTE considered using the waste heat from the power plant for any purpose?
78. Does the ramp rate specified in NTE's response to Council interrogatory 18 result in the proposed plant having the capability to change output quickly enough to balance generation from intermittent, renewable power resources?
79. Based on the power plant MW data on page 39 of Volume I of the Application and the response to interrogatory 16, the following MW data has been noted below. Please provide the missing data to complete the chart. The existing data may be corrected if necessary.

| | Natural Gas Summer | Natural Gas Winter | Natural Gas ISO | ULSD Summer | ULSD Winter | ULSD ISO |
|---|-----------------------|-----------------------|--------------------|----------------|----------------|---------------|
| CTG | | | 301 MW | | | 260 MW |
| STG with duct firing | | | 248 MW | N/A | N/A | N/A |
| STG without duct firing | | | 151 MW | | | 123 MW |
| Parasitic Load (with duct firing for natural gas only) | (13 MW) | (15 MW) | (14 MW) | (10 MW) | (10 MW) | |
| Net Output (with duct firing for natural gas only) | | | 535 MW | | | |

Electric Energy and Markets Questions

80. Would the proposed project qualify for the Tri-State New England Clean Energy RFP (Tri-State RFP)? If so, was the proposed project submitted as a proposal under the Tri-State RFP?
81. If NTE is not a winning bidder for the KEC project in the ISO-NE England Inc. (ISO-NE) Forward Capacity Auction (FCA) in February 2017, i.e. the project is not selected, will NTE still construct the facility?
82. Which regional generation units will be retired or close to retirement when the proposed plant is constructed and ready for operation in 2020?
83. Discuss the concept of power pools and how electric generators operate in a regional New England system.

84. Comments have been made that there is not a need for the plant's power output in Connecticut, but that the power is needed to serve Boston and/or eastern New England. Is this correct? If no, why not?
85. Are there financial penalties associated with ISO-NE's FCA if NTE's plant is called to operate by ISO-NE and cannot operate due to fuel unavailability? If yes, is this part of the reason for ULSD storage, in the event that even "firm gas" is interrupted?

Fuel Questions

86. Are there any expected natural gas infrastructure expansion/improvements that would benefit facility operation? In particular, are there any improvements that would address reliability risks and price volatility?

Air Emissions Questions

87. Reference NTE's response to Council interrogatory number 50. If 150 feet is not the minimum height to achieve compliance with air quality standards, what would be the pros and cons of a shorter stack height?

Wildlife Questions

88. As an update, to date, has NTE received any follow-up correspondence from the Connecticut Department of Energy and Environmental Protection (DEEP) regarding Natural Diversity Database species?

Other Environmental Questions

89. As an update, to date, has NTE received a response from any of the Tribal Historic Preservation Offices (THPO) regarding the proposed project? If yes, provide a copy of such response(s).

Power Plant Safety Questions

90. Specifically, would the hydrogen be used to cool the stators, i.e. the fixed portion of both generators?
91. Reference NTE's response to Council interrogatory number 64. What are the pros and cons of a lined containment area versus a double-walled tank for the storage of ULSD?