STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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	:	Docket No. 470 October 20, 2016

NOT ANOTHER POWER PLANT'S INTERROGATORIES TO NTE CONNECTICUT, LLC

Not Another Power Plant ("NAPP") requests that the petitioner, NTE Connecticut, LLC ("NTE") respond to the following interrogatories concerning its proposed 550 MW combined-cycle natural gas-fired electric generating facility and related and integrated appurtenances ("the NTE Facility"):

1. With regard to Appendix B-2 to NTE's application, titled "Killingly Energy Center: An Analysis of Need and Economic & Environmental Impacts" (the "Need Analysis"), page 7, Aurora Model Input Assumptions, please list all resource additions and resource retirements, by year/month of addition or retirement, and by plant name and summer capacity (MW), used in the modeling to estimate alleged electricity cost savings and emissions effects. The response should include, but is not limited to, all fossil, renewable, and import resources considered in the model, including imports from Canada.

2. With regard to the Need Analysis, page 7, Aurora Model Input Assumptions, please confirm, or state with detailed explanation otherwise, that the only difference between the "with" and "without" modeling used to compute energy, capacity and emissions effects of the proposed plant is the presence of the KEC unit in the modeling.

3. With regard to the Need Analysis, page 7, Aurora Model Input Assumptions, please state the source and date / vintage of the load forecast used in the Aurora modeling. Please provide the peak and annual energy load forecast projections for Connecticut and for New England, by year for all years modeled, for the determination of the alleged electricity cost savings and emissions effects of the proposed plant.

4. With regard to the Need Analysis, page 7, Aurora Model Input Assumptions, please state whether the peak load forecast and annual energy load forecast projections asserted by NTE contain the effects of Connecticut and New England energy efficiency resource reduction to load. Please provide the level of any such energy efficiency projections, by year for all years modeled, as used in NTE's modeling of alleged electricity cost savings and emissions effects and the source of any such energy efficiency projections.

5. With regard to the Need Analysis, page 7, Aurora Model Input Assumptions, please state whether the peak load forecast and annual energy load forecast projections asserted by NTE contain the effects of Connecticut and New England behind-the-meter solar PV load reductions. Please provide the level of any such behind-the-meter solar PV load reductions, by year for all years, as used in NTE's modeling of alleged electricity cost savings and emissions effects, and the source of any such behind-the-meter solar PV load reductions.

6. With regard to the Need Analysis, page 7-8, energy and capacity costs for Connecticut ratepayers, please state how alleged capacity cost savings were projected for any or all years of the modeling, by year, out to 2024.

7. With regard to the Need Analysis, page 9, Aurora Model Input Assumptions, please confirm that the modeling used to develop estimates of emissions effect used the same

input assumptions as that used to develop energy price impacts noted on page 7. To the extent that the same input assumptions were not used, explain why, and provide the rationale for not using the same input assumptions.

8. With regard to the Need Analysis, page 9-10, specifically Section 2.4 ("Assessment of environmental benefits") and Section 2.5 ("Projected emissions reductions"), please provide the following modeling outputs:

a. in excel-spreadsheet based format, the hourly output of the proposed facility for all hours of all years modeled (2020 through 2024), for the "with facility" model runs, in MWH and indicating the date and time of the output.

b. the applicable heat rate or heat rates of the facility as modeled in the "with facility" runs, for all years of the model runs. Include and explain any variation in heat rate seen in the model runs "with facility" for the proposed plant.

c. A breakdown of the source of CO2 emission reductions in Table 2-5, by state and by month.

d. A breakdown of the fuel sources associated with the emission reductions seen in Table 2-5, by state and by month.

9. With regard to the Need Analysis, page 10, CO_2 emissions compliance, please provide all analyses conducted to determine whether or not the proposed plant will be in compliance with Connecticut Public Act 08-09. Please identify the assumptions that were used

regarding the level of Connecticut's all-sector 2030 emission reduction target, and identify all assumptions used regarding electric power sector emission reduction targets for 2030.

10. With regard to the Need Analysis, page 14, Aurora Model Input Assumptions, please state whether or not any future resource capacity associated with the proposed Northern Pass Transmission line, or the proposed New England Clean Power Link, is reflected as part of the cleared resources included in your results for FCA11.

11. With regard to the Need Analysis, page 13-14, Aurora Model Input Assumptions, please state your assumptions around which, if any, existing – i.e., currently have an ISO NE capacity supply obligation (CSO) for the 2019/2020 capacity commitment period - New England fossil fuel units do not clear in the FCA11 auction as modeled, and are thus considered retired. Provide any further explanation as necessary.

12. Please supplement Table 10-1 of the Application to include all permits and approvals required for the final approved construction and operation of the proposed NTE Facility, including all permits and approvals required for all "Project-Related Interconnections" discussed in Section 8.0 of the Application, and all permits and approvals required for the modification of any roads needed to facilitate construction or use of the NTE Facility.

13. Explain whether the NTE Facility will be able to operate as proposed in the Siting Council Application if permits and approvals for the modifications to the proposed 2.8 mile natural gas pipeline are not approved.

14. Explain whether the NTE Facility will be able to operate as proposed in the Siting Council Application if permits and approvals for the Water Pipe Interconnection with

Connecticut Water Company ("CWC") are not approved, or if CWC does not construct the interconnection.

15. Explain whether the NTE Facility will be able to operate as proposed in the Siting Council Application if permits and approvals for the Wastewater Interconnection are not approved.

16. Explain whether the NTE Facility can be constructed and operated as proposed in the Siting Council Application if permits and approvals for the modification of local roads are not approved.

17. Provide NTE's full and complete response, if any, to each of the Order of Regulations and Restrictions set forth in the Town of Killingly, Planning and Zoning Commission Order of Regulations and Restrictions dated October 12, 2016.

18. Provide NTE's full and complete response, if any, to to each of the Order of Regulations and Restrictions set forth in the Town of Killingly Inland Wetlands and Watercourses Commission Order of Regulations and Restrictions dated October 12, 2016.

19. The Traffic Impact Report (Appendix I) fails to address the current equestrian use of Lake Road. Please indicate what actions NTE proposes to undertake specifically to protect the safety of riders and horses that regularly use the Lake Road area directly adjacent to, and in the vicinity of, the proposed NTE Facility.

20. How will NTE enforce its prohibition on truck travel from the NTE Facility and heading in a westward direction on Lake Road? Will NTE provide a means for trucks that inadvertently turn west onto Lake Road with an ability to turn and change direction?

21. What actions will be taken by NTE to prevent trucks from traveling to the NTE Facility from Route 101 and through the residential area of Lake Road that is designated "No Thru Truck"?

22. The Traffic Impact Report indicates that the existing no truck signage near Forbes Road will be relocated to a point west and south of the NTE Facility driveway. The Traffic Impact Report does not indicate what impact such relocation will have on the amount of truck traffic that exits Forbes Road. Please discuss the impact of such relocation, including what actions will NTE take to prevent truck traffic from exiting Forbes Road and traveling west on Lake Road.The Town of Killingly Noise Ordinance establishes a nighttime noise level at the property boundary of 45 decibels (dBA) for residential properties. The NTE Facility is located in a residential zone and residential properties abut the NTE Facility boundary. Why then, does the Sound Survey and Analysis Report at Appendix L of the NTE Application apply a 51 dBA threshold?

23. What is the measured noise level for nighttime "steam blows" and other anticipated nighttime construction activities by NTE?

24. Will impulse noises from the construction and operation of the NTE Facility exceed the 80 dBA level set forth in the Town of Killingly Noise Ordinance Section 12.5-125(c)(2)?

25. Mr. Ives of NTE has stated at public meetings in the Town of Killingly that the NTE Facility will cause local residential property values to increase. Please provide the data and reports to support this statement.

26. NTE indicated on October 19, 2016 that pre-blasting surveys will be provided to residents that are concerned about the impact of blasting on wells and foundations. When will such surveys be provided and which property owners will receive them?

27. What type of data will be included in the pre-blasting surveys?

28. What studies have been conducted to assure that radon gases entrapped in local bedrock will not be released into local residential drinking water wells and local homes?

29. In the event that blasting and other construction activities by NTE should deteriorate groundwater quality, or affect the flow of water into drinking water wells through sedimentation or redirection of groundwater flow within bedrock fractures, damage foundations, or increase the concentration of radon in drinking water wells or homes, what actions will NTE take to mitigate such impacts?

By: _____

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CERTIFICATION

I hereby certify that a copy of the foregoing document was delivered by e-mail to the service list members on the 20th day of October, 2016, as follows:

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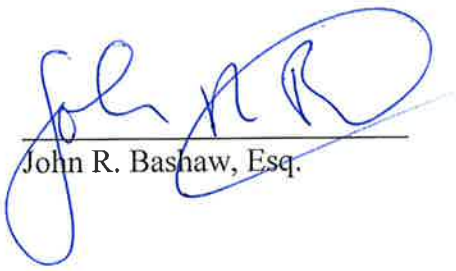

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