

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

NTE Connecticut, LLC application for a	:	
Certificate of Environmental Compatibility	:	
and Public Need for the construction,	:	Docket No. 470
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,	:	November 2, 2016
Killingly, Connecticut	:	

MOTION TO EXTEND

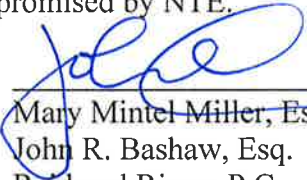
Not Another Power Plant (“NAPP”) hereby requests that the Council extend the deadline for the pre-filed testimony of NAPP’s energy needs expert, Bob Fagan, from November 8, 2016, to one week from the date on which Mr. Fagan receives the information promised in the responses to NAPP’s interrogatories filed by NTE Connecticut, LLC (“NTE”). In support of its request, NAPP states:

1. On October 27, 2016, NTE responded to NAPP’s interrogatories, redacting several responses based on allegations that “commercially valuable, confidential, proprietary and/or market-sensitive information” would, without such redactions, otherwise be included therein.
2. NTE then offered to provide the information subject to a protective order.
3. Also on October 27, 2016, NTE filed a motion with the Siting Council seeking such a protective order, in which it agreed to provide the redacted information to Mr. Fagan once the Siting Council grants the motion and Mr. Fagan executes the non-disclosure agreement.

4. Mr. Fagan is ready and willing to execute the non-disclosure agreement if the Siting Council grants NTE's motion for protective order on November 3, 2016.
5. Regardless of whether the Siting Council grants or denies NTE's motion for protective order, the earliest date on which Mr. Fagan could receive the full responses to NAPP's interrogatories would be November 3, 2016 (and quite possibly later).
6. One week will be sufficient time for Mr. Fagan to review the "commercially valuable, confidential, proprietary and/or market-sensitive information" that NTE has withheld and for Mr. Fagan to fully complete his testimony.
7. NAPP does not object to the Siting Council granting NTE one week in which to review Mr. Fagan's testimony prior to being required to cross-examine him.

WHEREFORE, for good cause shown, NAPP asks that the deadline for pre-filed testimony for Mr. Fagan be extended from November 8, 2016, to one week from the date on which Mr. Fagan receives the information promised by NTE.

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 2nd day of November, 2016, as follows:

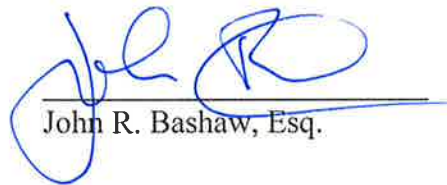
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