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September 21, 2010

**VIA HAND DELIVERY AND
ELECTRONIC MAIL**

Daniel F. Caruso, Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

**RE: Docket No. 187A –PDC-EI Paso Milford LLC Certificate of Environmental Compatibility
and Public Need for the Milford Power Project located off of Oronoque Road in Milford,
Connecticut—Response to Pre-Hearing Interrogatories**

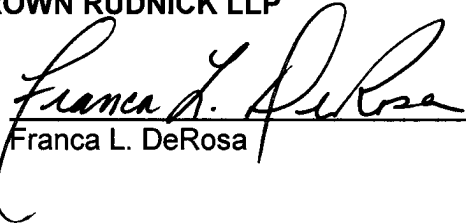
Dear Chairman Caruso:

Enclosed are an original and fifteen (15) copies of the Milford Power Company LLC's
responses to the Pre-Hearing Interrogatories set forth in the Connecticut Siting Council's
September 8, 2010 correspondence.

Please contact me with any questions.

Very truly yours,

BROWN RUDNICK LLP

By: 
Franca L. DeRosa

Enclosures
cc: Service List

Q-CSC-1

Does Milford Power expect any cleaning of natural gas pipelines to be necessary for any reason during the life of operation of the Milford Power Plant? If so, what method would be used for the cleaning of the natural gas pipelines associated with the project?

RESPONSE:

Milford Power does not expect that any cleaning of its natural gas piping will be necessary during the life of the Milford Power Plant.

Because Iroquois Gas (“Iroquois”) and Southern Connecticut Gas (“SCG”) each have natural gas equipment on Milford Power’s site to serve its power plant, Milford Power asked Iroquois and SCG provide information for this response as well as for the responses to Q-CSC-2 and Q-CSC-3.

Iroquois responded that it does not anticipate any special internal cleaning of its on-site facilities. If any internal cleaning is required, Iroquois would not use natural gas to “clean” its facilities. Iroquois typically utilizes air, inert gas (such as nitrogen) or water.

SCG responded that it does not anticipate any special internal “cleaning” of its on-site facilities. If any internal cleaning is required, SCG would expect to depressurize its equipment and use wire brushes or something equivalent. SCG would not consider any type of line pressure “blow” to clean its facilities.

**PDC – El Paso Milford, LLC
Docket No. 187A
Responsible Witness: Michael Cartney**

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Q-CSC-2

Would Milford Power have staff to oversee the pipe-cleaning process? What credentials would be required of that staff?

RESPONSE:

As stated in Milford Power's response to Q-CSC-1, Milford Power does not expect that any pipe-cleaning will be necessary. If pipe-cleaning were necessary, Milford Power would hire a qualified outside vendor to oversee that process.

Iroquois confirmed that, to introduce or remove natural gas, air or inert gases from an Iroquois facility, its staff must have appropriate qualifications in accordance with federal Department of Transportation regulations (49 CFR Part 192) and Iroquois' audited Operator Qualification Plan.

SCG stated that if it had to do any cleaning of its on-site facilities, it would expect to use its own Part 192 operator qualified personnel to do the work.

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Q-CSC-3

What, if any, additional safety measures would be taken during the pipe-cleaning process?

RESPONSE:

As stated in its response to Q-CSC-1, Milford Power does not expect to have any cleaning of its natural gas piping equipment during the operational life of the Milford Power plant. If pipe-cleaning were necessary, Milford Power would hire a contractor with operator qualified personnel and require that contractor to assure compliance with all applicable laws, regulations, codes and best practices.

Iroquois indicated that when it removes or introduces natural gas from a pipeline, under 49 CFR Part 192, operator qualified personnel must perform the operation. All facilities involved are identified, sources of ignition are removed from the area, notifications are made, persons not directly involved are moved outside the affected area, and the weather is checked. Iroquois uses a combustible gas indicator to verify the facilities are either clear of natural gas or fully gassed-in.

SCG stated that it would always use Part 192 operator qualified personnel to do the work and would always purge or clear piping/equipment with a low flow controlled purge, and use a combustible gas indicator to verify whether the piping/equipment is fully cleared or fully gassed-in.

Q-CSC-4

How many times since commencement of operation of the power plant has natural gas service been interrupted to the facility for any length of time?

RESPONSE:

Since 2004 (when Milford Power commenced commercial operation), natural gas service to Milford Power has only been fully interrupted once. This interruption occurred on May 26th, 2009 and lasted approximately 10 hours. This interruption resulted from a failed valve on the SCG system. The failed valve closed and SCG personnel were unable to get the valve to re-open. This valve controlled the main line and shut off all gas to Milford Power. A representative of the valve manufacturer was called in to make repairs to allow the valve to operate again.

Additionally, as described in Attachment 1 to Milford Power's July 29, 2010 Petition, Iroquois has only declared a *force majeure* on two occasions since 2000. Neither of these occasions resulted in a complete curtailment of natural gas service. Rather, they resulted in relatively small reductions in delivery service throughout the delivery days impacted. Finally, on a number of occasions, Iroquois has required that Milford Power reduce its hourly (but not daily) gas take to comply with Milford Power's gas nominations or to alleviate concerns on the Iroquois system (loss of compressor station, lightning strikes, etc.). The majority of these instances have been in duration of less than 8 hours and occurred on the order of 6 to 15 times per year from 2005 through 2008. During all these instances, Milford Power was continued to operate. These incidents have been reduced significantly since Iroquois added additional compression facilities at its existing Milford compressor station in late 2008. There have only been 7 incidents of reduced load since the fall of 2008.

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Q-CSC-5

Would any buildings and/or equipment used exclusively for the back up fuel system remain in place following decommissioning?

RESPONSE:

Milford Power will not remove any buildings as part of the back up fuel system decommissioning process. The only equipment to be removed is the piping that carries the fuel oil and water mixture to the burners. The piping to be removed is shown in the photos on Pages 13 and 14 of Attachment 2 of Milford Power's Petition. This piping is comprised of a set of 44 pipes on each gas turbine. Each pipe in the set is only 4-5 feet in length.

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Q-CSC-6

Please provide a site plan of the existing facility, showing all existing equipment and identifying any structures/equipment that would be removed as proposed.

RESPONSE:

A site plan showing all existing equipment that is used as part of the back up fuel system is attached. The following buildings and structures that are part of the back up fuel oil system and are shown on the site plan are:

- 103 and 203 – Fuel Oil Injection Buildings
- 106 and 206 – NOx Water Injection Buildings
- 305 – Fuel Oil Unloading Area
- 306 – Fuel Oil Forwarding Building
- 307 – Fuel Oil Storage Tank
- 324 – Foam House (Fire Protection for Fuel Oil Tank)

As stated in Milford Power's response to Q-CSC-5, Milford Power will not be removing any structures or equipment as part of the decommissioning process, except for the 4-5 feet of pipe that carries the fuel oil and water mixture to the burners.

PARTIES AND INTERVENORS SERVICE LIST

Status Granted	Status Holder	Representative
Applicant	PDC – El Paso Milford, LLC	<p>Michael Cartney Milford Power Company, LLC 55 Shelland Street Milford, CT 06460</p> <p>Tom Favinger CPV Milford, LLC c/o Competitive Power Ventures, Inc. 8403 Colesville Road, Suite 915 Silver Spring, MD 20910</p> <p>Timothy P. Kober Nixon Peabody LLP 437 Madison Avenue New York, NY 10022</p> <p>James A. Hanley, CCTS Assistant Vice President Wilmington Trust Company Rodney Square North 1100 North market Street Wilmington, DE 19890-1605</p> <p>Franca L. DeRosa, Esq. Brown Rudnick LLP 185 Asylum Street CityPlace I, 38th Floor Hartford, CT 06103 860-509-6539 860-509-6501 fax fderosa@brownrudnick.com</p>
Intervenor	Connecticut Light and Power Company	<p>Duncan R. Mackay, Esq. Vincent P. Pace, Esq. The Connecticut Light & Power Company P.O. Box 270 Hartford, CT 06141-0270 860-665-5000 860-665-5504 fax mackadr@nu.com pacevp@nu.com</p>

PARTIES AND INTERVENORS SERVICE LIST

Status Granted	Status Holder	Representative
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Intervenor	Southern Connecticut Gas Company	General Counsel Southern Connecticut Gas Company 855 Main Street Bridgeport, CT 006604 203-382-8301
Intervenor	Iroquois Gas Transmission System, L.P.	Paul W. Diehl Iroquois Gas Transmission System, L.P. One Corporate Drive Shelton, CT 06484 203-925-7200