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May 20, 2013

**VIA COURIER AND ELECTRONIC MAIL**

Robert Stein, Chairman  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051  
United States of America

**Re: Docket No. 190B – Meriden Gas Turbines, LLC Certificate of Environmental Compatibility and Public Need for a 530 MW Combined Cycle Generating Plant in Meriden, Connecticut. Reopening of this Docket Pursuant to Connecticut General Statutes § 4-181a(b) Limited to Council Consideration of Changed Conditions and a Decommissioning Plan – Response to Meriden Gas Turbines, LLC’s Objection to the City of Meriden’s Motion to Compel and Motion for Suspension or Extension of Time**

Dear Chairman Stein:

On behalf of the City of Meriden (the “City”), this letter responds to Meriden Gas Turbines, LLC’s (“MGT”) May 17, 2013 Objection to the City of Meriden’s Motion to Compel (the “Objection”) and Motion for Suspension or Extension of Time (the “Motion”), both filed with the Connecticut Siting Council (the “Council”).

To accommodate MGT’s request for additional time to retain experts and prepare pre-filed testimony, the City would consent to a thirty (30) day extension of the adjudicatory portion of this proceeding. The City, however, believes that the public field review of the facility and the hearing session reserved for public comment should proceed as scheduled on June 4, 2013.<sup>1</sup>

This format would facilitate both MGT’s and the City’s ability to prepare their cases, and, thereby, serve the Council’s goal of developing an informative and complete record. First, MGT would have more time to prepare its case, including pre-filed testimony and exhibits. Second, given that MGT has objected to providing access to the facility outside of the public field review, the City would have the opportunity to prepare and submit pre-filed testimony based on its experts’ review of the facility during the public field review.<sup>2</sup> Consequently, the record would be substantially more complete when the adjudicatory portion of the hearing commences on the date selected by the Council, allowing a more thorough and efficient cross-

<sup>1</sup> Holding the public field review and the public comment session on the same date conserves the Council’s resources by minimizing the number of trips to Meriden.

<sup>2</sup> The City disagrees with many of the statements and arguments contained in the Motion and Objection, in particular regarding the Council’s jurisdiction and scope of this proceeding. However, given the limited time to respond, the City will not specifically address those statements and arguments but reserves its right to do so at a later time. To the extent the Council agrees to allow the public field review to proceed and to extend the adjudicatory portion of the hearing, the City’s Motion to Compel and MGT’s Objection become moot.

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examination of the parties' positions. Importantly, MGT did not indicate in its Motion that it would be prejudiced by proceeding with the public field review and public comment session on June 4, 2013.

In summary, the City consents to MGT's request to extend this proceeding provided the public field review and the hearing session reserved for public comment proceed as scheduled on June 4, 2013.<sup>3</sup> A copy of this filing has been sent by electronic mail or first class mail to all participants.

Very truly yours,

**BROWN RUDNICK LLP**

A handwritten signature in black ink, appearing to read 'Pm Small', written over the printed name.

Philip M. Small  
Counsel for the City of Meriden

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<sup>3</sup> If the Council decides to delay the adjudicatory portion of the hearing, which is scheduled to commence at 3 p.m., the City would be amenable to holding the public field review, scheduled for 1:30 p.m., later that same afternoon.



**SERVICE LIST  
DOCKET NO. 190B**

**LIST OF PARTIES AND INTERVENORS  
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Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
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