

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Meriden Gas Turbines, LLC Certificate of	:	Docket No. 190B
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	:	May 17, 2013

MOTION FOR SUSPENSION OR EXTENSION OF TIME¹

As the Council is aware from Meriden Gas Turbine, LLC's ("MGT") written comments in this docket, dated April 5, 2013, MGT does not believe that the Siting Council has any jurisdiction to reopen this docket as MGT's property in Meriden is not a facility. MGT has appealed the Council's decision in Superior Court and will be seeking an order to stay the administrative proceeding. The Council should take no further action until the jurisdictional issue is resolved by the Court. However, if the Council decides to move forward with the administrative proceeding, MGT respectfully requests the Connecticut Siting Council (the "Council") issue at least a thirty (30) day extension to the remaining items listed on the May 2nd, 2013 proposed procedural schedule ("Proposed Schedule") issued by the Council in the above-referenced docket. MGT will be unduly burdened and will be unable to properly prepare to meet the deadlines outlined in the Proposed Schedule. As the responding party in this proceeding, MGT is at a significant disadvantage in terms of advance preparation, and has as of yet been unable to select and retain experts to prepare MGT's pre-filed testimony. As the outcome of this docket has the potential to influence significantly MGT's rights and

¹ MGT objected to the reopening of this docket on grounds of lack of jurisdiction. Without waving those objections, MGT hereby participates in this proceeding under protest.

obligations with respect to the Property at issue in this proceeding, MGT believes that if the Council does not extend the procedural schedule as MGT requests, MGT will be significantly prejudiced in its ability present its case. Pursuant to Conn. Gen. Stat. § 16-50o, MGT "shall have the right to present such oral or documentary evidence and to conduct such cross-examination as may be required for a full and true disclosure of the facts." As it currently stands, the accelerated procedural schedule in this docket has not permitted MGT adequate time to develop its evidence with respect to this proceeding. If the Council denies MGT's request for an extension, MGT will be unable to provide adequate oral and documentary evidence that permits a full and true disclosure of the facts. Given that the conditions at the site have been virtually unchanged for years, no imminent harm will occur if the Council grants MGT's request. Conversely, a denial of MGT's request for an extension would significantly prejudice MGT.

CONCLUSION

WHEREFORE, for the foregoing reasons, MGT respectfully requests a thirty (30) day extension to the remaining items listed on the Council's May 2nd, 2013 proposed procedural schedule in the above-referenced docket.

Respectfully submitted,

MERIDEN GAS TURBINES, LLC

By: 

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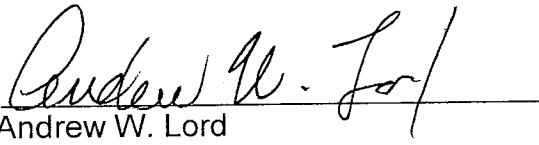
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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of May a true copy of the above document was served upon those parties and intervenors attached via e-mail and first class mail.

By 
Andrew W. Lord

**LIST OF PARTIES AND INTERVENORS
SERVICE LIST**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	Meriden Gas Turbines, LLC	<p>Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 185 Asylum Street Hartford, CT 06103-3469 (860) 240-6180 alord@murthalaw.com</p> <p>Raymond G. Long Director, Government Affair NRG Energy, Inc. Middletown Station P.O. Box 1001 1866 River Road Middletown, CT 06457</p> <p>Jonathan Milley Vice President, NE Region NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540 (609) 524-4680 Jonathan.milley@nrgenergy.com</p> <p>NRG Energy, Inc. c/o Julie L. Friedberg, Senior Counsel – NE 211 Carnegie Center Princeton, NJ 08540 (609) 524-5232 Julie.friedberg@nrgenergy.com</p>
Intervenor	The Connecticut Light and Power Company	<p>Stephen Gibelli, Esq. Associate General Counsel The Connecticut Light & Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5513 Gibels@nu.com</p>

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Intervenor	The Connecticut Light and Power Company	<p>John R. Morissette Manager-Transmission Siting and Permitting The Connecticut Light & Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-2036 morisjr@nu.com</p> <p>Christopher R. Bernard Manager, Regulatory Policy (Transmission) The Connecticut Light & Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5967 bernacr@nu.com</p>
Intervenor	Rivers Alliance of Connecticut Farmington River Watershed Association	<p>Eric Hammerling, President Rivers Alliance of Connecticut P.O. Box 1797 Litchfield, CT 06759</p> <p>Kevin Case Farmington River Watershed Association 749 Hopmeadow Street Simsbury, CT 06070</p>
Party	Quinnipiac River Watershed Association	<p>Mary Mushinsky Executive Director Quinnipiac River Watershed Association P.O. Box 2825 Meriden, CT 06450 (203) 237-2237 (phone and fax) qrwa@sbcglobal.net</p>
Party (Approved on April 18, 2013)	City of Meriden	<p>Philip M. Small Scott A. Muska Brown Rudnick LLP CityPlace I, 185 Asylum Street Hartford, CT 06103 psmall@brownrudnick.com smuska@brownrudnick.com</p> <p>Deborah L. Moore City Attorney City of Meriden 142 East Main Street Meriden, CT 06450 dmoore@meridenct.gov</p>