STATE of CONNECTICUT CONNECTICUT SITING COUNCIL

CT Docket 192B

January 27, 2015

<u>Pre-Hearing Interrogatories & Requests for Production</u> Directed to CPV Towantic, L.L.C.

- 1. How would someone living in the three-mile radius of the plant be affected by smell/sound/air quality, and other health considerations? How about during construction?
- 2. Could living near the plant cause health problems over time? Please provide author of testimony.
- 3. Is there any data on the long-term effects of PM2.5 on developing, teenage bodies, especially those of young women?
- 4. Would there be any compensation if people living in the surrounding areas got sick or had health problems exacerbated by the plant?
- 5. What could some of the long-term, ecological effects be of the emissions on the soil and forests within a three-mile radius of the plant?
- 6. Would possible vibrations/harmonics or plumes from the plant interfere with local bats, birds or other wildlife?
- 7. What is the lifespan of the plant?
- 8. With the rate at which technology develops, how long until the technology of this plant is no longer BACT, and a more sustainable option comes along?
- 9. Does building this facility deincentivize the potential for CT to invest in a solar/wind facility in the future? Conversely, does saying "no" to the building of this plant open up the conversation about building a more sustainable, renewable energy facility?
- 10. Does the building and success of this plant realistically have the potential to close one of the "sooty six" (CT's oil and coal burning plants)? If so, what is the projection timeline?
- 11. Will traffic of the local areas be affected? Who will improve the infrastructure of roads to handle high traffic/big 80,000 lb. trucks?
- 12. Will the building and operation of the plant guarantee jobs to <u>CT</u> workers, and how many, for how long?

- 13. What is the temperature of the exit stack gas as it leaves the 150' stacks? How will this influence local weather patterns and visual effects in the winter and summer?
- 14. As we understand it, the plant will be using water from one watershed (Heritage Village, Southbury) and putting it into another (Naugatuck). Will this out of basin water use adversely affect the water table and aquatic life in any one area?

Respectfully Submitted by Westover School WISE* students under the direction of

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