

ORIGINAL

January 7, 2015

State of Connecticut
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

RECEIVED
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CONNECTICUT
SITING COUNCIL

Attn: Melanie A. Bachman, Acting Executive Director

Re: Docket 192B-Towantic Energy, LLC Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need based on changed conditions pursuant to Connecticut General Statutes §4-181a(b) for the construction, maintenance and operation of a 785 Megawatt dual-fuel combined cycle electric generating facility located north of the Prokop Road and Towantic Hill Road intersection in the Town of Oxford, Connecticut.

Dear Attorney Bachman,

In accordance with the Council "Prehearing Conference Procedure for Hearing of", dated December 19, 2014, respecting item #2, I respond as follows:

1. Pre-file Testimony

It is impossible for me to pre-file testimony to issues that have not yet developed and/or have not been made available to me to present, such as the fact (among others) that the CONNDEEP hasn't even begun to review the emissions modeling for the facility. I am also disadvantaged by not having a reasonable amount of time to build and present a case in opposition to a behemoth electrical generating power plant and all that it entails. The applicant would have everyone believe that its "Petition to Reopen and Modify the Decision" involves mere "modifications" to an existing Certificate, but we all know differently. The CONNDEEP has made it quite clear that the applicant is incorrect with its modification posture, and therefore is treating the submission as a NEW submission; not an existing one with "modifications". The hearings will demonstrate that every facet of this Petition by CPV Towantic LLC must be exhaustively researched and studied; not only by the intervenors, but by the Council as well.

2. Exhibits

I herewith enclose, and will exchange certain exhibits concerning the issue of Thermal plumes from Exhaust stacks and Equipment Effects on Aviation in electronic form (disc) due to the voluminous content. The disc contains FAA study reports on the issue, which find that exhaust plumes are hazards to aviation. The SAIC Report specifically identifies the effects on the Waterbury-Oxford Airport, and finds the effects of the Towantic LLC Energy Center (previous 512 MW plant) stack emissions would present unacceptable hazards to flight in the whole vicinity of the airport.

There is also attached one document in paper form on the same subject. (please see enclosures) Please note that I have previously provided this information to the CAA directly.

3. Witnesses

I plan to present up to four witnesses, licensed pilots, who will testify at the hearings or provide affidavits if they are not able to be present. Due to the uncertain time/date of the hearing schedule in my case, I am unable to identify at this time which of the witnesses will be available to testify at the hearing.

4. Administrative Notice

The only items to be administratively noticed at this time are the above mentioned exhibits. (please see enclosures)

I reserve the right to offer additional testimony, add additional witnesses and exhibits, and right of cross examination for new testimony or information that may occur as the hearings proceed.

Thank you for your kind attention.

Respectfully,



Raymond Pietrorazio
764 Charcoal Ave.
Middlebury, CT 06762

Enclosures:

Electronic disc #2012-007657A

FOIA FILES

Containing: SAIC Report to FAA, dated Sept. 30, 2012

Mitre Corp. Analysis, dated Sept., 2012

ACRP Report 108, dated April 25, 2014

cc: Service List Docket 192B