

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

CPV TOWANTIC, LLC MOTION TO REOPEN AND	:	DOCKET NO. 192B
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	:	APRIL 27, 2015
OPERATION OF A 785 MW DUAL –FUEL COMBINED	:	
CYCLE ELECTRIC GENERATING FACILITY LOCATED	:	
NORTH OF THE PROKOP ROAD AND TOWANTIC HILL	:	
ROAD INTERSECTION IN THE TOWN OF OXFORD,	:	
CONNECTICUT	:	

POST- HEARINGS BRIEF OF THE TOWN OF MIDDLEBURY

A. SUMMARY

The Town of Middlebury, an original party and intervenor in the original contested case - the underlying subject matter known as Docket 192, as well as the Reopening since designate Docket 192A, fully participated in the subject proceedings triggered by the Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need filed on November 3, 2014 by the successor permittee, CPV Towantic, LLC (“CPV”). However, as part of the vote by the Connecticut Siting Council (the “Council”) to grant the CPV’s Motion to Reopen (so as to conduct the proscribed evidentiary hearings on the proffered changed circumstances), the Council exercised its statutory authority to reopen Docket 192 in its entirety and did not limit the proceedings to the changed conditions presented in CPV’s Motion to Reopen. Despite various requests for more time to consider the voluminous filings, the Council proceeded to schedule successive Public Hearings, each date only being announced at the conclusion of the prior session and without regard to the additional materials that were being requested by Interrogatories of the Council, the several intervenors and the additional filings that were made amending prior documents and supplementing the record. Despite

the fluidity of the evidence submitted by CPV on its own, in response to interrogatories and direct questioning of CPV's witnesses, the intervenors were expected to be prepared to cross-examine on the materials as their turn arose in order of their having been approved as intervenors. Deadlines were imposed on the parties and intervenors as to their submissions; but the written comments of the State and Federal agencies concurrently reviewing aspects of the project within their jurisdiction were allowed to be filed as rendered, though several significant reviews are yet to be completed.

The proposed changes outlined in this permitted electric generating facility are so extensive as to be unprecedented for a modification proceeding and therefore should be the subject of a new application. However, all the changes to the facility are NOT the changes that CPV cites as the statutory mandated "changed conditions..." warranting the reopening. Rather, CPV claims that "the fundamental changes to the electric, natural gas, and financial markets, as well as environmental regulations, as discussed in Section V [of the Petition], represent new information and unforeseen events that constitute changed conditions." Considering the amount of time that has transpired from the date of the original 512MW proposal approved on June 23, 1999 to the date of CPV's Petition, it would be difficult not to find changed conditions calling for a modernization of the proposal. However, there is a logical disconnect to the itemized changes cited by CPV to justify the project being enlarged to a 785MW proposal while relying on essentially the old environmental compatibility and public need assessment that is more than a decade old.

The record substantiates the conclusion that today and in the foreseeable future, there is NO NEED for the CPV Towantic facilities to meet the electric generation supply requirements of Connecticut 2015-2022 as the mix of older, including the expected retirements, and new facilities will be adequate to meet demand. The proffered claim of needed jobs cited by some individuals at the at the evening session of the January 15, 2015 Public Hearing and desire of the current

administration of the Town of Oxford to boost the tax base of the Town of Oxford with the proposed facility are not factors for due consideration within the jurisdiction of the Council. Most significant to the consideration of the Council is the incomplete submission by CPV of the current conditions and impact of the proposed changes to the facilities that relies on the prior approvals in 1999 and 2007 as well as the expectation to supplement and define the project in the details of a Development and Management Plan. The Council has the authority to find changed circumstances in the market conditions but not allow the particular proposal for 785 MW facilities on 26 acres in Oxford, Connecticut based on the increased impacts to the site and the surrounding land, water and air resources.

## II. BACKGROUND

The most recent ISO-New England, Inc. forecast report in its **2014 Regional System Plan** provided:

“The amount of capacity resources located in import-constrained zones is projected to meet the local resource adequacy requirements. Connecticut resources exceed this zone’s local sourcing requirement (LSR) by 1,872 MW. [Footnote omitted] In FCA #8, the LSR for Northeast Massachusetts (NEMA)/Boston was 3,428 MW, and the resources in this area, including new resources not yet on line, totaled 3,821 MW. Although the NEMA/Boston area is projected to have surplus capacity, the ISO has growing concerns about the lack of timely development of new resources in this area that, if not developed, would result in the area being short of required capacity. Additional load growth or reduced resource availability—possibly resulting from fuel supply issues; a failure to develop new, cleared resources in a timely manner; or retirements—could create the need to develop additional new resources across the region or in constrained zones. [footnote omitted] (Section **Error! Reference source not found.**)<sup>1</sup> at page 11

In Docket F-2012/2013, the Connecticut Siting Council’s Final Report date December 12, 2013 concludes “... that even taking into account the most conservative predication, the ISO-NE 90/10 forecast, the electric generation supply during 2013-2022 will be adequate to meet demand.” Any deficits... could be made up fairly easily by activating the full range of available generation, maximizing the use of active demand response resources, and devising other such operational

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<sup>1</sup> Administrative Notice List Item 11

strategies.” (at page 51 of 61)<sup>2</sup>

The fact that the market place continues to fluctuate and has evolved over the past fifteen years since the original permit issued on Docket 192 is not a “change condition” warranting the reopening for the Certificate Holder to tweak the proposed power plant that is not critical. The proposed project is clearly a luxury item in the panoply of ISO-NE electric generating realm that will otherwise sully a bucolic residential area of Connecticut with tons of pollutants emitted annually as a byproduct of fossil-fuel combustion. Corrections in the wholesale electric market which make the proposed power plant more financially viable, necessarily require the upgrades in the design proposed but do not change the underlying conundrum that a more efficient model of a power plant at this site is no longer needed due to the additions of other electric-generation over the 16 years of inaction on the existing permit. The overview of the CEA Report (Exhibit 2 of the Petition) explains the history of the electric and natural gas markets thus giving some indication as to why the 512 MW facility had not been commenced when it was due to be completed in eighteen months time . Choosing to upgrade the turbine technology, the Certificate Holder updates the stale components but fails to address the overall obsolescence of baseload facilities and trend for micro-generating facilities to spread the generating load. With so many variables to consider, the Council must not be mesmerized with the promises of the ultimate power plant. The Council should recognize the same type of early Twenty-first century facility - only bigger and a poor fit having to squeeze into 26 acres of Oxford, Connecticut and despite all that has transpired in its surroundings.

The Petition cites the missing permits presumably for the 512 MW facility that the Certificate Holder needs but, pending the determination on the upgrade, has requested another extension of time “to permit, engineer, finance and construct” (letter G – Extension of Construction Deadline, page 14 of Petition). In fact, nothing in the Petition gives any assurances that even with each of the

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<sup>2</sup> Administrative Notice List Item 32

modifications that the updated plan will be built pending more gyrations of permitting, engineering, finance and construction issues. The ISO-NE regional electricity market has supplied its constituents, including the electricity customers of Connecticut, for the past 16 years despite the need determined in 1999 and 2007 in Docket 192 and 192A, respectively. The record<sup>3</sup> supports a determination that having managed without Towantic Energy for 16 years, and based on the forecasts made by Council itself, State of Connecticut Department of Energy and Environmental Protection (“DEEP”), and ISO- NE, there is no compelling need for the facilities today or in the foreseeable future. Therefore, if the Council should decide there are changed circumstances in the electricity market, then the Council should also decide that there is no longer a sufficient Need to warrant the environmental impact of the facility to the site and the surrounding area.

### III. DISCUSSION

#### A. Size Matters – to generate the additional output requires fuel sources that are not currently available without impacting other generators.

In November 2014, ISO reported on the supply side problems remaining in the region during extreme cold weather events like those experienced in January 2014, stating:

“ With virtually all the natural gas- and oil-fired generators operating with limited fuel inventories and constrained energy-production capabilities, the reliable operation of the grid proved challenging for the ISO. During the coldest days, the ISO carried gas-fired units as reserves, but the increased dispatches to provide these reserves further stressed the gas pipelines for covering non-gas-fired contingencies. Carrying these reserves also increased out-of-market generation because certain gas units have high start-up and no-load costs, further exacerbated by high natural gas prices during this winter.” Page 131 ISO-NE 2014 Regional System Plan

The logic that CPV Towantic is intended to fill the void by replacing the current capacity retiring is flawed if the natural gas- and oil-fired generation proposed is competing for the same limited fuel supplies. Even arguing for the marginal efficiency boost of 4% (57% to 61% fuel burned to electricity rating) and the 150% increased generating capacity otherwise limited by the available

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<sup>3</sup> DRAFT I FOF

water resource and permitted air pollution of the original proposed facilities (512MW + 4%) x1.5), a “new and improved” CPV Towantic could be no more reliable in its larger output of 785 MW when competing for the same constrained fuel inventories. While ISO-NE maintains: “The region is in a precarious position for the next several winters as major resources other than gas continue to retire and longer-term proposed market enhancements and energy infrastructure improvements are years away” Page 134 Supra ISO-NE; CPV Towantic will not be available for Winters 2015-16, 2016-17, 2017-18 and possibly 2018-19 based on their sole judgment to defer action on the 512MW facility in the three years that CPV Towantic has been the Certificate Holder. The future remains uncertain that the energy infrastructure improvements will coincide with the proposed build out of the proposed 785 MW facility. Leaving the current constraints on delivery of either natural gas and/or oil in the existing market for the foreseeable future that cannot support another natural gas- and oil-fired generator much less one as greedy for the “limited fuel inventories” as CPV Towantic seeks to compete for in the open market. The recent addition of the 520MW Kleen Energy facility approved in 2002 and ultimately on line in 2013 (CSC – Docket 225) located approximately 30 miles easterly in Middletown clearly has ameliorated the supply of electricity but would be directly competing for the same natural gas supply from the currently constrained Algonquin Pipeline if CPV Towantic is allowed to poach the same fuel source. Similarly, the needs being met by the 544MW Milford Power facility located approximately 27 miles southerly in Milford which is supplied by a competing natural gas supply from the Iroquois Pipeline which was approved in 1999 (the same year as Towantic), made fully operational in 2005 but allowed since 2010 to suspend its backup oil-fired generation (based on the findings that “natural gas supply has increased considerably and improvements have been made to the pipeline infrastructure in New England; there have been improvements to the Connecticut electric transmission grid; and new power generation facilities have been constructed” with the caveat that “Milford Power would be required to recommission and make

available the backup fuel oil system within 120 days after the occurrence of a second natural gas delivery disruption to the power plant of five or more consecutive days within any five-year period; CSC –Docket 187 & 187a) . The improvements demonstrated in Winter 2014-15 in the natural gas distribution to address more severe cold may have eliminated the remaining claim for continued dual-fuel capability.

Need is not a constant but ebbs and flows with the myriad of variables that when summarized into the annual forecasts by multiple authorities such as the Council, DEEP, and ISO- NE. The recent forecasts have the crisis of 16 years ago at the turn of the Twenty-first century for supply of electricity-generation over and only localized constraints remain. The preferred response to the localized problems is smaller generation that fit the problem. CPV Towantic is a colossus that its handlers are touting as a game-changer that can undercut the competition through its efficiency quotations and thus drive out multiple old polluters for an improved regional pollution score. Among the many parallels offered for CPV Towantic to morph into a 785 MW facility is the Vermont Yankee nuclear plant 604 MW retirement in December 2014. Still, it begs the question why the retirement of generation more than two hundred miles away dictates the need for this sized facility in Oxford, Connecticut. If Vermont, Rhode Island, or Massachusetts, individually or collectively, short on production of electricity, then new facilities closer to the need there would better satisfy the need regionally.

Admittedly, any like facilities will produce pollution at the site in Oxford. But much of the argument from the Certificate Holder is that it had already been approved in 1999 and again in 2007 for a fixed amount of pollution so the Council need only compare the new proposal to the original despite the current professed review in its “entirety” as voted at the Reopening on November 13, 2104[Draft I FOF 4]. Some parameters are improved but other are worse requiring more offsets to be acquired. The failure of the 512MW facility to be built after 16 years should be taken into

consideration when assessing whether it reasonable for area residents to measure the future impact not by the marginal differences between the facility needed in 1999, and affirmed in 2007, but now in 2015. Shouldn't all that transpired in 16 years (or even just the past 8 years) work both for and against the overall need assessment? It appears from the justification of the largest footprint possible on the 26 acre site that the proposal is driving the need assessment and not vice versa.

A survey of the last four facilities approved by the Council clearly demonstrates that the proposal is too large and crammed on to the site. Citing the projects in order chronologically as proposed to the Council, the proposed sites and percentage of coverage are as follows:

<u>Docket/FOF</u>	<u>Town/City</u>	<u>Applicant</u>	<u>Site Acres</u>	<u>Facilities (ac.)</u>	<u>% Coverage</u>
187 #13	Milford	PDC-El Paso	28	20	71
189 #37	Killingly	Lake Road Generating Co	60	30	50
190 #11	Meriden	PDC-El Paso	36	11	31
192 #68	Oxford	CPV Towantic	26	24	92
225 #25	Middletown	Kleen Energy Systems	137	48	35

Despite being proposed with the greatest output capacity, CPV Towantic has the smallest site owned by the applicant and highest percentage of coverage of the site for construction and operation. The operation are not sized correctly for the site based on the average of the other four approvals. The CPV Towantic site is half the size it should be for its projected 24 acres of operations. The project is impinging on all the surrounding properties while claiming to fit within its boundaries.

B. The Project impacts on the surrounding area outweighs the need, if any

While the proposed modifications were submitted with some updates to the original application, the submission by the close of the evidentiary hearing clearly lacked all the elements necessary for determining the environmental impact of the site. Most notably absent was a vernal



pool study, a biological survey for target species, and a breeding bird survey. Despite the importance of these studies to the statutory mandate to determination of the impacts of the proposal, and thus suitability of the site selection, the mandate is not limited to the specific acres to occupy but the impact on the surrounding areas as well. This Certificate Holder appears to care little for the impact of the project beyond its boundaries relying on the past approvals and current sponsorship of the local officials. The project located in the northeast corner of the Town of Oxford's Woodruff Hill Industrial Park and just 535 feet south of the Middlebury/Oxford town line. [Docket 192 FOF 54 & 56]. Measuring around the mid-point on the northern boundary of the proposed project, the distance to the southerly bound in circumference being approximately 1635 feet, the circle encompassing the project covers approximately 193 acres.<sup>4</sup> By subtracting the distance of the distance to the town line from the radius ( $1635 - 535 = 1100$ ) the portion of the surrounding area about one-third ( $1/3$ ) of the area of that circle is in the Town of Middlebury – an area of approximately 56 acres and entirely zoned residential.<sup>5</sup> Therefore, almost two times an area larger than the project site itself is in the same vicinity of the project but only received mention in the “Sound Survey and Analysis” – Appendix D of Exhibit 1.

According to the independent contractors engaged by the applicant, they did not survey the wetlands and watercourse north, south, east or west of the site. The applicant's failure to appreciate the full scope of the project, or purposeful neglect in passing over the inclusion of specific components of the project, deprives the Council with current information on the impact of more than a half mile of new road yet to be build incorporated into the proposal through a sensitive wetland

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<sup>4</sup> Adding the measurements along the Western boundary, the North-south axis is the summation of  $225.00' + 471.71' + 242.43' + 299.456' + 397.16' = 1635.756'$ . The area of a circle is calculated as  $A = \pi r^2$ ; so rounding the length of the project site to a radius of 1635', the project is located in the southerly portion of the area measuring  $(3.14)1635' \times 1635' / 43560 \text{sqfeet/ac.} = 192.7 \text{ acres}$

<sup>5</sup> See diagram Appendix A

area west of the project site as part of the access way intended to avoiding residential properties. The history of prior wetland studies and specific involvement of Council member Dr. Michael W. Klemens, also the subject of the Notice dated December 12, 2014, was shrouded even further with the late recusal of Dr. Klemens but not before he identified the relevance of the issue [see Tr. January 29, 2015 p. 189 -192] to his fellow Council members by his inquiries of the project impact on Jack's Brook and other off-site wetlands – the specific watercourse that E-commerce Road crosses west of the project site. The extent of the wetland survey can be summarized by the following cross examination of the Applicant's soil-scientist:

MR. SAVARESE: Did you survey the surrounding area of the proposed site?

THE WITNESS (Gustafson): Yes. We, as part of our wetland investigation, we investigated the entire subject property as well as the perimeter of the site within about a hundred feet of the project perimeter.

MR. SAVARESE: So to the north towards Middlebury you only went a hundred feet beyond the site?

THE WITNESS (Gustafson): That's correct.

MR. SAVARESE: To the west towards the airport you only went a hundred feet beyond the site?

THE WITNESS (Gustafson): Yes, that's correct. Approximately a hundred feet.

MR. SAVARESE: To the south towards Oxford and Prokop Road, Towantic Hill Road, a hundred feet?

THE WITNESS (Gustafson): That's correct.

MR. SAVARESE: And east towards Larkin State Park Trail, about a hundred feet?

THE WITNESS (Gustafson): That's correct. MR. SAVARESE: Did you visit Towantic Pond south by 3400 feet?

THE WITNESS (Gustafson): No.

MR. SAVARESE: Did you visit Long Meadow Pond northeast by 3,000 feet?

THE WITNESS (Gustafson): No.

MR. SAVARESE: Did you visit Jack's Brook southwest by 2,000 feet?

THE WITNESS (Gustafson): No.

MR. SAVARESE: Did you receive -- did you review the area along the proposed access road, E- Commerce Road to be built by the Town of Oxford?

THE WITNESS (Gustafson): No.

Transcript of March 26, 2015, p. 62 – 64.

The Applicant's soil scientist provided additional testimony on the potential mitigation of the lost wetlands as follows:

MR. SAVARESE: Would you say that is a valuable wetland area to the west of the site?

THE WITNESS (Gustafson): Yes. Yeah, the wetland system that's associated with the Jack's Brook is -- is a wetland system that has - - supports a number of important functions and values.

MR. SAVARESE (erroneously attributed to Atty. Small):

Would that be suitable terrain then to enhance what is already there, to offset what is being lost in Wetland I, II and III?

THE WITNESS (Gustafson): That potential exists. .

Transcript of March 26, 2015, p. 82.

The Off-site study of a valuable wetland was not provided to the Council.

#### IV. CONCLUSION

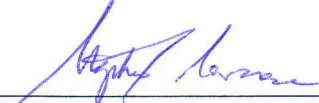
For the foregoing reasons, the undersigned counsel on behalf of the Town of Middlebury respectfully submits the Petition should be denied. In the alternative, the Town of Middlebury as the Air Quality Issue is pending and Hazard to Aviation is pending and the access road contemplated has not been built that the approval be conditioned as follows:

- 1) The Applicant be required to immediately install ambient air quality sensors in more than three locations at a distance of approximately 3000 feet from the project site so that changes in the air quality can be assessed by collecting a baseline in the three years expected before the project is operational and continue thereafter to verify the projections presented in these proceedings.
- 2) If the operations of the Waterbury-Oxford Airport are modified, by agreement of the Connecticut Airport Authority to conditions of approval of the stacks as proposed granted by the Federal Aviation Administration, then this Docket 192B be automatically reopened to accept testimony on the impacts of the modifications made

to accommodate the project.

- 3) Construction be precluded before the E-commerce Road is completed to serve as the proposed access to the project site.

TOWN OF MIDDLEBURY

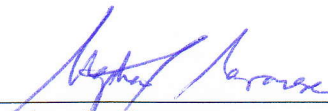


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## CERTIFICATION

This is to certify that an original and twenty (15) copies of the foregoing were hand delivered by to The Connecticut Siting council, 10 Franklin Square, new Britain, CT 06051 and one copy of the above was mailed or electronically delivered on this 27<sup>th</sup> day of April 2015, on the applicant, parties and intervenors on the attached service list.

  
\_\_\_\_\_  
Stephen L. Savarese  
Commissioner of the Superior Court

# Appendix A

Total Circle area - 192.7 acres

Area North of Middlebury/Oxford Town line

$$\frac{R^2}{2} \left( \frac{\pi}{180} C - \sin C \right)$$

is calculated as 56.2 acres

Segment lengths depicted:

AD = 1544'

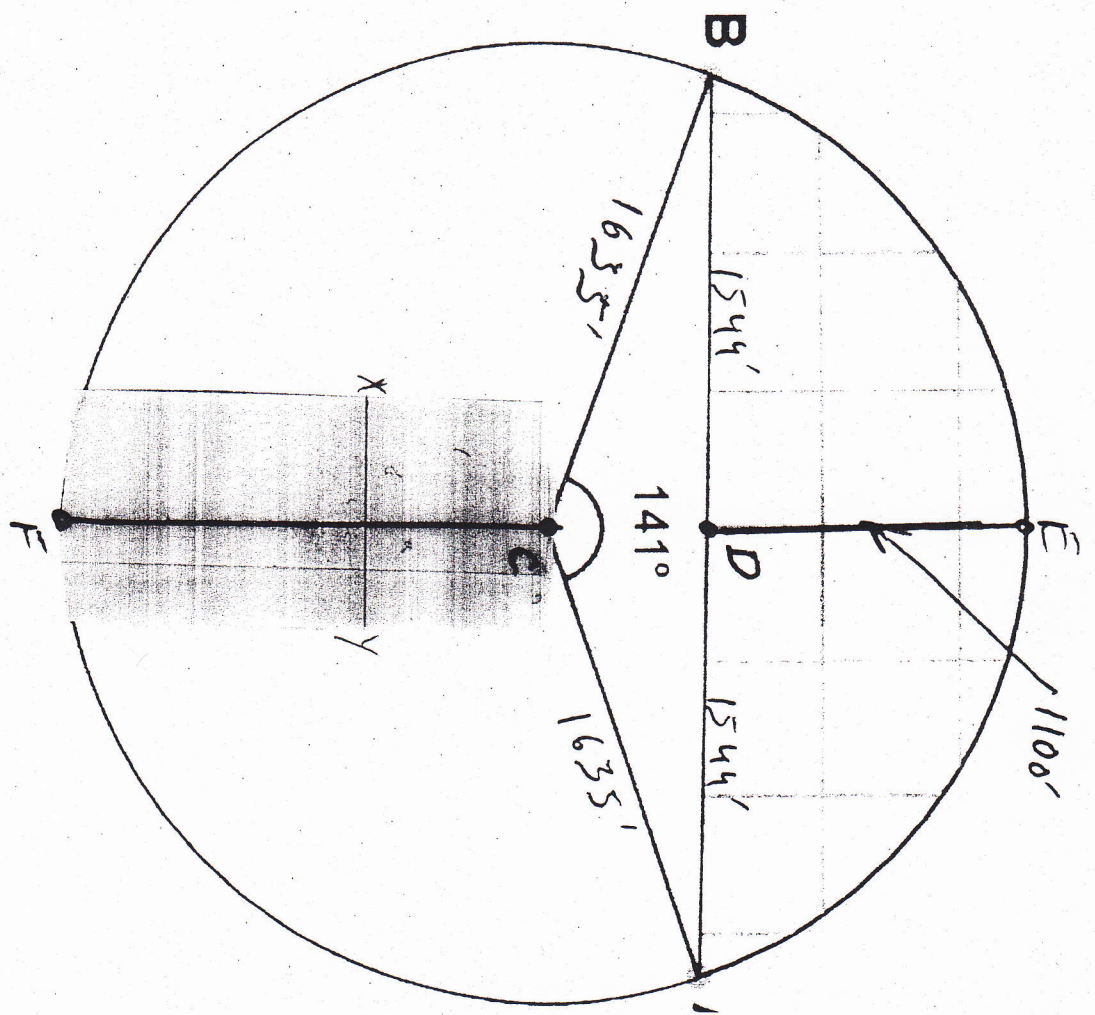
CD = 535'

AC = 1635'

DE = 1100'

CF = 1635'

XY = 708'



**LIST OF PARTIES AND INTERVENORS  
SERVICE LIST**

<b>Status Granted</b>	<b>Status Holder (name, address &amp; phone number)</b>	<b>Representative (name, address &amp; phone number)</b>
<b>Applicant</b>	CPV Towantic, L.L.C.	Franca L. DeRosa, Esq. Philip M. Small, Esq. Brown Rudnick LLP 185 Asylum Street Hartford, CT 06103 (860) 509-6500 (860) 509-6501 – fax <a href="mailto:fderosa@brownrudnick.com">fderosa@brownrudnick.com</a> <a href="mailto:psmall@brownrudnick.com">psmall@brownrudnick.com</a>
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<b>Intervenor</b>	Town of Middlebury	Attorney Dana A. D'Angelo Law Offices of Dana D'Angelo, LLC 20 Woodside Avenue Middlebury, CT 06762 (203) 598-3336 (203) 598-7283 – fax <a href="mailto:Dangelo.middlebury@snet.net">Dangelo.middlebury@snet.net</a>  Stephen L. Savarese, Esq. 103 South Main Street Newtown, CT 06470 203-270-0077 <a href="mailto:attystephensavarese@gmail.com">attystephensavarese@gmail.com</a>
<b>Intervenor</b>	The Connecticut Light and Power Company (CL&P)	Stephen Gibelli, Esq. Associate General Counsel The Connecticut Light and Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5513 (860) 665-5504 –fax <a href="mailto:gibels@nu.com">gibels@nu.com</a>

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	CL&P continued...	<p>John R. Morissette  Manager-Transmission Siting and Permitting  The Connecticut Light and Power Company  P.O. Box 270  Hartford, CT 06141-0270  (860) 665-2036  <a href="mailto:morisjr@nu.com">morisjr@nu.com</a></p> <p>Christopher R. Bernard  Manager, Regulatory Policy (Transmission)  The Connecticut Light and Power Company  P.O. Box 270  Hartford, CT 06141-0270  (860) 665-5967  (860) 665-3314 – fax  <a href="mailto:bernacr@nu.com">bernacr@nu.com</a></p> <p>Stella Pace, Senior Engineer  The Connecticut Light and Power Company  Transmission and Interconnection Dept.  P.O. Box 270  Hartford, CT 06141-0270  (860) 665-3569  <a href="mailto:paccess@nu.com">paccess@nu.com</a></p> <p>Jeffery D. Cochran  Northeast Utilities Service Company  107 Selden Street  Berlin, CT 06037  860-665-3548  <a href="mailto:cochrjd@nu.com">cochrjd@nu.com</a></p>
<b>Party</b>	Town of Oxford	Kevin W. Condon, Esq. Condon & Savitt PC P.O. Box 570 Ansonia, CT 06401 203-734-2511 <a href="mailto:condonsavitt@comcast.net">condonsavitt@comcast.net</a>
<b>Party</b>	Naugatuck Valley Chapter Trout Unlimited	Robert M. Perrella, Vice President TU Naugatuck/Pomperaug Valley Chapter 278 W. Purchase Road Southbury, CT 06488-1004 <a href="mailto:johnnytroutseed@charter.net">johnnytroutseed@charter.net</a>



<b>Intervenor</b>	Town of Southbury	Ed Edelson First Selectman Town of Southbury 501 Main Street Southbury, CT 06488 <a href="mailto:selectman@southbury-ct.gov">selectman@southbury-ct.gov</a> (203) 262-0647 (203) 264-9762 – fax
<b>Party</b>	The Pomperaug River Watershed Coalition	Len DeJong, Executive Director Pomperaug River Watershed Coalition 39 Sherman Hill Road, C103 Woodbury, CT 06798 203-263-0076 <a href="mailto:LDeJong@pomperaug.org">LDeJong@pomperaug.org</a>
<b>Intervenor (approved 06/07/06)</b>	Raymond Pietrorazio 764 Charcoal Avenue Middlebury, CT 06762-1311 (203) 758-2413 (203) 758-9519 – fax <a href="mailto:ray@ctcombustion.com">ray@ctcombustion.com</a>	
<b>Intervenor (approved 10/10/06)</b>	GE Energy Financial Services, Inc.	Jay F. Malcynsky The Law Offices of Jay F. Malcynsky, P.C. One Liberty Square New Britain, CT 06051 (860) 229-0301 (860) 225-4627 – fax <a href="mailto:Jmalcynsky@gaffneybennett.com">Jmalcynsky@gaffneybennett.com</a>
<b>Intervenor (Approved on November 13, 2014)</b>	Borough of Naugatuck and Borough of Naugatuck Water Pollution Control Authority	Edward G. Fitzpatrick, Esq. Alicia K. Perillo, Esq. Fitzpatrick, Mariano, Santos, Sousa, PC 203 Church Street Naugatuck, CT 06770 203-729-4555 <a href="mailto:Fitz@fmslaw.org">Fitz@fmslaw.org</a> <a href="mailto:alicia@fmslaw.org">alicia@fmslaw.org</a>  Ronald Merancy, Chairman Water Pollution Control Authority 229 Church Street Naugatuck, CT 06770 203-720-7000 <a href="mailto:Rjm62156@aol.com">Rjm62156@aol.com</a>

<b>Intervenor</b> <b>(Approved on</b> <b>January 8, 2015)</b>	Wayne McCormack 593 Putting Green Lane Oxford, CT 06478 <a href="mailto:wayne@waynemccormack.com">wayne@waynemccormack.com</a>	
<b>Intervenor</b> <b>(Approved on</b> <b>January 8, 2015)</b>	Naugatuck River Revival Group, Inc.	Kevin R. Zak, President Naugatuck River Revival Group, Inc. 132 Radnor Avenue Naugatuck, CT 06770 <a href="mailto:kznrreg@sbcglobal.net">kznrreg@sbcglobal.net</a> 203-530-7850
<b>Intervenor</b> <b>(Approved on</b> <b>January 8, 2015)</b>	Westover Hills Subdivision Homeowners	Chester Cornacchia Westover Hills Subdivision Homeowners 53 Graham Ridge Road Naugatuck, CT 06770 203-206-9927 <a href="mailto:cc@necsonline.com">cc@necsonline.com</a>
<b>Intervenor</b> <b>(Approved on</b> <b>January 8, 2015)</b>	Westover School	Kate J. Truini Alice Hallaran Westover School 1237 Whittemore Road Middlebury, CT 06762 203-758-2423 <a href="mailto:ktruini@westoverschool.org">ktruini@westoverschool.org</a> <a href="mailto:ahallaran@westoverschool.org">ahallaran@westoverschool.org</a>
<b>Intervenor</b> <b>(Approved on</b> <b>January 8, 2015)</b>	Greenfields, LLC and Marian Larkin	Edward S. Hill, Esq. Cappalli & Hill, LLC 325 Highland Avenue Cheshire, CT 06410 203-272-2607 <a href="mailto:ehill@cappallihill.com">ehill@cappallihill.com</a>
<b>Intervenor</b> <b>(Approved on</b> <b>January 8, 2015)</b>	Lake Quassapaug Association, LLC	Ingrid Manning, Vice President Lake Quassapaug Association, LLC P.O. Box 285 Middlebury, CT 06762 203-758-1692 <a href="mailto:Ingridmanning2@gmail.com">Ingridmanning2@gmail.com</a>

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<b>Intervenor</b> <b>(Approved on</b> <b>January 15, 2015)</b>	Naugatuck Valley Audubon Society	Sophie Zyla Jeff Ruhloff Carl Almonte Naugatuck Valley Audubon Society 17 Stoddard Place Beacon Falls, CT 06403 203-888-7945 <a href="mailto:NVASeditor@mail.com">NVASeditor@mail.com</a>
<b>Intervenor</b> <b>(Approved on</b> <b>January 15, 2015)</b>	Oxford Flying Club	Burton L. Stevens Oxford Flying Club, Inc. P.O. Box 371 Woodbury, CT 06798 203-236-5158 <a href="mailto:bstevens@snet.net">bstevens@snet.net</a>