



BURTON B. COHEN
203.772.7714 DIRECT TELEPHONE
BCOHEN@MURTHALAW.COM

September 19, 2014

VIA ELECTRONIC MAIL AND FIRST-CLASS MAIL

Attorney Melanie Bachman
Acting Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Docket No.451 Homeland Towers, LLC and New Cingular Wireless
(AT&T): Responses to Pre-Hearing Interrogatories by Town of Cheshire

Dear Ms. Bachman:

Enclosed please an original and fifteen copies of the responses of the Town of Cheshire to the pre-hearing interrogatories issued by the Connecticut Siting Council (the "Council") in the above-referenced docket.

Please contact the undersigned if you have questions regarding this submission. Thank you for your consideration.

I certify that a copy hereof has been furnished on this date via first-class mail, postage prepaid, or via email delivery to all parties, intervenors and participants of record as evidenced on the Council's service list as of this date.

Respectfully yours,

TOWN OF CHESHIRE, CONNECTICUT

A handwritten signature in blue ink that reads 'Burton B. Cohen'.

By: _____
Burton B. Cohen
Its Attorney

Enclosures

Docket No. 451
Homeland Towers, LLC and New Cingular Wireless (AT&T)
Cheshire, Connecticut
Pre-Hearing Interrogatories for Town of Cheshire

1. *How would the Town of Cheshire provide for backup power for its equipment at the proposed facility? What kind of fuel would the backup generator use? How many hours of service would the generator be able to provide before it needs to be refueled?*

Response: The Town of Cheshire's equipment at the proposed facility will have backup power provided by an electrical generator that is used at the Cheshire Wastewater Treatment Plant (the "Plant"). The Plant is in the process of installing a new 1200 kW, diesel-fired, backup electrical generator that is capable of supplying the electrical needs of the entire Plant. The generator will be supplied with diesel fuel stored in a 6,000 gallon above ground fuel tank. The generator is capable of supplying at least 48 hours of service at full load. Depending on the flow rate at the plant, and the time of year, as certain pieces of equipment operate only seasonally, the actual amount of time that this supply of fuel would last could be of a longer duration.

2. *Would the Town of Cheshire's backup power equipment include any provisions for the protection against fuel spills?*

Response: The Plant's backup power equipment is constructed to provide maximum protection against any potential fuel spills. The 6,000 gallon double walled tank manufactured by ConVault is above ground and designed to be EPA compliant for spill containment and prevention. In addition, the tank sits on a concrete pad, and has a spill containment box located on the filling port.

3. *Does the Town's water pollution control plant have a backup power source that could be used to supply backup power for its wireless telecommunications equipment at the proposed facility?*

Response: See response to Pre-Hearing Interrogatory No. 1.

4. *Would the Town be amenable to sharing a backup generator with other tenants of the proposed facility?*

Response: The Town is not interested in becoming the source of backup power for other tenants at the proposed facility. The generator at the Plant is for the sole purpose ensuring the public health concerns of the residents of the Town of Cheshire. The Plant upgrade construction is funded in part by a Clean Water Fund grant and loan from CT DEEP, and any portion devoted to the telecommunications facility would certainly be ineligible, which would subject the Town to a reduction in both grant and loan amounts, if allowed at all. The Town does not want to assume the responsibility for providing backup power to commercial users of the proposed facility. For those reasons, the Town respectfully is not interested in exploring this option further.