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*Via Hand Delivery and Electronic Mail*

November 15, 2010

Linda Roberts  
Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

**Re: Docket No. NT-2010: Reopening of Final Decisions Pursuant to C.G.S. § 4-181(a)(b) for Jurisdictional Natural Gas-Fired Electric Generating Facilities Under C.G.S. § 16-50i(a)(3) and C.G.S. § 16-50k(a) Limited to Council Consideration of Changed Conditions and the Attachment of Conditions to the Certificates and Declaratory Rulings Consistent with the Findings and Recommendations in the Final Report Issued by the Kleen Energy Plant Investigation Review Panel (Nevas Commission) and the Findings and Recommendations in the Executive Report Issued by the Thomas Commission**

Dear Ms. Roberts:



Enclosed are an original and fifteen (15) copies of the Responses of Waterbury Generation, LLC to Connecticut Siting Council Pre-Hearing Interrogatories in connection with the above-referenced proceeding.

Please feel free to contact me if you have any questions or require additional information. Thank you.

Sincerely,

Joey Lee Miranda

Enclosures

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**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

IN RE: :  
: :  
REOPENING OF FINAL DECISIONS : DOCKET NO. NT-2010  
PURSUANT TO C.G.S. § 4-181a(b) FOR :  
JURISDICTIONAL NATURAL GAS-FIRED :  
ELECTRIC GENERATING FACILITIES :  
UNDER C.G.S. § 16-50i(a)(3) AND C.G.S. § :  
16-50k(a) LIMITED TO COUNCIL :  
CONSIDERATION OF CHANGED :  
CONDITIONS AND THE ATTACHMENT OF :  
CONDITIONS TO THE CERTIFICATES AND :  
DECLARATORY RULINGS CONSISTENT :  
WITH THE FINDINGS AND :  
RECOMMENDATIONS IN THE FINAL :  
REPORT ISSUED BY THE KLEEN ENERGY :  
PLANT INVESTIGATION REVIEW PANEL :  
(NEVAS COMMISSION) AND THE :  
FINDINGS AND RECOMMENDATIONS IN :  
THE EXECUTIVE REPORT ISSUED BY THE :  
THOMAS COMMISSION : NOVEMBER 15, 2010

**RESPONSES OF WATERBURY GENERATION LLC TO  
CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES**

On October 28, 2010, the Connecticut Siting Council (“Council”) issued Pre-Hearing Interrogatories to Waterbury Generation LLC<sup>1</sup> (“WatGen”) in connection with the above-captioned proceeding. Below are WatGen’s responses.

Question No. 1

If the facility has already been constructed, what versions of the NFPA standards were utilized?

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<sup>1</sup> For additional information regarding the project, see Petition No. 831.

## Response

The WatGen facility was designed in 2007 and 2008 and began commercial operation on June 26, 2009. NFPA 54 (2006 edition) and NFPA 850 (2005 edition) were used as design standards for the facility. At the time, NFPA 37 did not apply because it was limited to facilities of less than 7,500 horsepower. In addition, although not in effect at the time, through the use of good engineering practices, WatGen did comply with the requirements later set forth in NFPA 54 Temporary Interim Amendment 09-3.

Furthermore, the WatGen facility was designed and constructed to comply with the Connecticut Building Code, including the 2003 International Building Code and codes referenced therein and the 2005 Connecticut Supplements, and NFPA 70, National Electric Safety Code (2005 edition). Moreover, independent reviews of the plant were conducted by the Waterbury Fire Marshal and the State Fire Marshal's Office and revisions to the plant's fire protection design were made based on their recommendations.

## Question No. 2

If the facility has yet to be constructed, what versions of the NFPA standards will be utilized?

## Response

Not applicable.

## Question No. 3

How would recommendation #6, "Recommendation as to adoption of codes" in the Thomas Commission Executive Report affect the facility?

## Response

Recommendation #6, “Recommendation as to adoption of codes” in the Thomas Commission Executive Report will not have any effect on the current operation of the WatGen facility.

## Question No. 4

How would the following codes affect construction or modification of the facility?

- a. NFPA 37 (2010 edition);
- b. NFPA 54 (2009 edition);
- c. NFPA 54 Temporary Interim Amendment 09-3 (August 25, 2010);
- d. NFPA 850 (2010 edition);
- e. NFPA 853 (2010 edition);
- f. ASME B31; and
- g. ASME B31.1 Appendices IV and V.

## Response

With the exception of NFPA 853, which applies to fuel cell installations, the codes noted above could each apply to any future modification to the facility depending on the scope of such modification. For instance, NFPA 850 provides for a more general, systematic assessment of fire risks at the facility and any changes to the plant would be assessed for compliance with NFPA 850 requirements. However, because the WatGen facility is a pre-packaged power plant (i.e., the internal piping has already been assembled and tested prior to delivery to the site), modifications to the plant would not normally involve the fuel delivery system. As a consequence, NFPA 54 and ASME B31.3 (the design piping code selected for the WatGen facility) would not apply. In addition, NFPA 37 is unlikely to apply because modifications to the external engine configuration would not typically be undertaken.

Question No. 5

What is useful lifespan of the natural gas piping/pipelines located within and to the facility?

Response

The piping to and within the facility is expected to have a useful life in excess of forty (40) years.

Question No. 6

Would the natural gas piping/pipelines within and to the facility need to be replaced during the life of the facility?

Response

WatGen does not anticipate that the natural gas piping/pipelines within or to the facility will need to be replaced during the life of the facility.

Question No. 7

Do you foresee any circumstances that would require replacement of a section of natural gas piping/pipeline within and to the facility?

Response

Currently, WatGen does not foresee any circumstances that would require replacement of a section of natural gas piping/pipeline within or to the facility as the current piping provides all the gas flow needed for the plant and is adequately protected against corrosion and from damage.

Question No. 8

If so, would a new section of natural gas piping/pipeline within and to the facility be installed and require cleaning?

Response

To the extent a circumstance should arise that would require replacement of a section of natural gas piping/pipeline, consistent with good engineering practices, WatGen would clean the piping prior to installation.

Question No. 9

What type of material is the natural gas piping/pipeline within and to the facility composed of?

Response

The piping to the facility was designed, procured and installed by Yankee Gas in accordance with the design and installation requirements of the U.S. Department of Transportation and the Connecticut Department of Public Utility Control. The pipe is coated to prevent corrosion, is constructed of extra heavy wall steel and is cathodically protected against corrosion. The natural gas piping within the WatGen facility is constructed of coated and wrapped carbon steel and heavy wall stainless steel.

Question No. 10

How many linear feet of natural gas piping/pipeline are located within and to the facility?

Response

The pipeline supplying natural gas to the plant is approximately 6,800 feet in length and there is approximately 350 linear feet of natural gas piping within the facility.

Question No. 11

What is operating pressure (psig) of the natural gas piping/pipeline within and to the facility?

Response

Natural gas is supplied to the facility from the Yankee Gas pipeline at approximately 650 psig. Once the natural gas reaches the on-site compressor, the pressure is increased to approximately 900 psig before it is introduced into the combustion turbine.

Question No. 12

What is the nominal pipe size in inches within and to the facility?

Response

The piping to and within the facility is all six (6) inch nominal pipe size.

Question No. 13

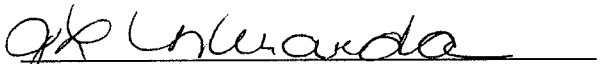
What is the length in feet of piping/pipeline that requires/required purging within and to the facility?

Response

The entire length of supply pipe to and within the facility was purged prior to operation of the facility.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of November 2010, a copy of the foregoing was sent via electronic mail or first class mail to all participants of record.

  
Joey Lee Miranda