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Also admitted in Massachusetts

March 25, 2025

Via Electronic Mail and Hand Delivery

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 470C – NTE Connecticut, LLC Certificate Of Environmental Compatibility And Public Need For The Construction, Maintenance And Operation Of A 650-MW Duel-Fuel Combined Cycle Electric Generating Facility and Associated Electrical Interconnection Switchyard Located at 180 and 189 Lake Road, Killingly, Connecticut**

Dear Attorney Bachman:

In accordance to the Siting Council's directive, enclosed please find the Prehearing Submission of Windham Energy Center, LLC identifying its witnesses and exhibits filed in advance of the April 1, 2025 evidentiary and public hearing sessions in Docket No. 470C.

If you have any questions or need any additional information regarding these matters, please contact me.

Sincerely,



Emilee Mooney Scott

Enclosure

31797717-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
NTE CONNECTICUT, LLC CERTIFICATE OF	:	DOCKET NO. 470C
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE CONSTRUCTION,	:	
MAINTENANCE, AND OPERATION OF A 650-	:	
MEGAWATT DUAL-FUEL COMBINED CYCLE	:	
ELECTRIC GENERATING FACILITY AND	:	
ASSOCIATED ELECTRICAL INTERCONNECTION	:	
SWITCHYARD LOCATED AT 180 AND 189 LAKE	:	
ROAD, KILLINGLY, CONNECTICUT.	:	MARCH 25, 2025

PRE-HEARING SUBMISSION

Windham Energy Center, LLC (“WEC”) hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the April 1, 2025 hearing in the above-referenced matter.

A. List of Witnesses

1. Kenneth Baldwin, Robinson & Cole, LLP (outside counsel for WEC).
2. Zvi Nixon, E. Landau Law Offices (outside counsel for Sunflower Sustainable Investments Ltd., corporate parent of WEC).

B. Exhibits to be offered

WEC intends to offer the following Exhibits:

1. WEC’s Motion to Reopen and Modify the Decision in Docket No. 470B Due to Changed Conditions, dated November 21, 2024.
2. WEC’s Sign Posting Affidavit filed on March 19, 2025.
3. WEC’s Responses to Council Interrogatories dated March 19, 2025.
4. WEC’s Motion for a Protective Order with respect to its responses to Council Interrogatory No. 9 and 11, dated March 21, 2025.

WEC reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

C. Remote Public Comment Session

If the Council deems necessary, WEC will be prepared to make a short presentation on the scope of the proceeding at the beginning of the Remote Public Comment Session.

Respectfully submitted,

WINDHAM ENERGY CENTER, LLC

By Emilee Mooney Scott
Emilee Mooney Scott, Esq.
Robinson & Cole LLP
One Trumbull Street
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Its Attorneys