

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Petition of Plainfield Renewable Energy LLC for a	)	Petition 784MR
Declaratory Ruling that No Certificate of Environmental	)	
Compatibility and Public Need Is Required for the	)	
Construction, Maintenance, and Operation of a 37.5 MW	)	
Wood Biomass Staged Gasification Generating Project in	)	
Plainfield, Connecticut	)	August 7, 2008

**PRE-HEARING SUBMISSION OF PLAINFIELD RENEWABLE ENERGY LLC**

Plainfield Renewable Energy LLC ("PRE") hereby submits its response to the July 16, 2008 Hearing Procedure memorandum issued by the Connecticut Siting Council (the "Council") in preparation for the August 14, 2008 hearing before the Council on the Friends of the Quinebaug River's ("FQR") motion to reopen the Council's declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance, and operation of a 37.5 megawatt wood biomass fueled gasification power plant (the "Project") in Plainfield, Connecticut, issued by the Council on June 7, 2007, as Petition No. 784. This hearing is being held to hear evidence as to whether conditions have changed such that the Council should conduct further proceedings to examine whether its original decision should be reversed or modified.

**I. Witnesses**

PRE currently expects the following individuals to be witnesses at the hearing:

1. Mr. Daniel J. Donovan, managing member of NuPower LLC, 20 Marshall Street, Suite 300, Norwalk, CT 06854, and joint owner of PRE. Mr. Donovan will provide testimony related to the various responses to the interrogatories from the Council and FQR. Mr. Donovan's résumé is attached as Attachment 1.
2. Mr. Scott Atkin LEP, Anchor Engineering Services, Inc., 75 Nutmeg Lane, Glastonbury, CT 06033. Mr. Atkin will provide testimony related to the various responses to the interrogatories from the Council and FQR, which may include technical information concerning the Project's site development and design, environmental impacts, site history, water supply, water discharge, and ongoing proceedings before the Connecticut Department of Environmental Protection ("DEP") on PRE's various permits. Mr. Atkin's résumé is attached as Attachment 2.
3. Other witnesses may be called, as necessary, to respond to interrogatories or Council questions at the hearings, or to address matters raised by participants, parties or intervenors.

**II. Pre-Filed Testimony**

PRE is not filing pre-filed testimony.

### **III. Documents to be Administratively Noticed**

PRE asks the Council to take administrative notice of the record in Petition 784 and in particular the Council's June 7, 2007 decision, opinion, and findings of fact, and PRE's Brief in Opposition to FQR's motion to reopen Petition 784.

Additionally, on July 31, 2008, PRE submitted a letter and bulk filing of documents which requested that the Council take administrative notice of the DEP tentative determination to approve four (4) permit applications by PRE, notice of the DEP's public hearing on PRE's various environmental permits, and the four draft permits themselves (solid waste, air, water diversion, and wastewater).

### **IV. Exhibits**

The following exhibits are anticipated to be offered into evidence at the hearing:

1. PRE's Interrogatory responses to Council Interrogatories, dated August 5, 2008;
2. PRE's Interrogatory responses to FQR's Interrogatories, dated August 5, 2008;
3. Affidavit of Daniel Donovan regarding notice, dated August 6, 2008 attached as Attachment 3; and
4. Résumés of the witnesses as indicated above.

Additional documents may be offered into evidence at the hearing, as necessary.

Respectfully submitted,

PLAINFIELD RENEWABLE ENERGY LLC

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