STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

PETITION OF BRIDGEPORT ENERGY II, LLC FOR A DECLARATORY RULING TO APPROVE THE INSTALLATION AND OPERATION OF A 350 MW PEAKING FACILITY AT THE EXISTING BRIDGEPORT ENERGY FACILITY IN BRIDGEPORT, CONNECTICUT	:	PETITION NO. 841
	:	FEBRUARY 26, 2008

BRIDGEPORT ENERGY II, LLC'S RESPONSES TO INTERROGATORIES
OF 60 MAIN STREET LLC ET AL

Bridgeport Energy II, LLC ("BE II") hereby files this response to the Interrogatories received from 60 Main Street, LLC et al ("60 Main Street") on February 15, 2008. Each of the foregoing responses was prepared for BE II by Blake Wheatley.

Q1. What visual mitigation has the Applicant considered incorporating to make the facility more compatible with the renewal of this area, specifically the approved $700 million 1,200-unit waterfront residential development (breaking ground later this year) across the street from the facility? Please identify specifically what visual mitigation methods were considered, and if rejected, why.

A. BE II has considered and implemented a multitude of features that make it more compatible with the urban surroundings in general and the 60 Main Street development in particular. The proposed combustion turbine generators and associated ancillary equipment will be enclosed in a building that will shield its neighbors from the enclosed generating equipment. The new electric line that will connect the proposed peaking station with Singer Substation will also be located underground. Few peaking facilities in the United States incorporate such features. In addition, BE II has included substantial landscaping along the south and west sides of the proposed facility. BE II's most recent facility arrangement relocates the building and facility equipment to the north and east. BE II looks forward to working with the developers of the 60 Main Street project to design landscaping that will best utilize the newly freed up space in a manner most compatible with the proposed mixed use development. BE II is also willing to consider architectural or other artistic treatment of its building, fuel oil storage tank and exhaust stacks. BE II plans to work with the developers of the 60 Main Street project on these design elements as well.

Q2. Has the Applicant considered housing/enclosing all or a portion of the facility in a façade or false structure? If it has, please respond with the depictions of the structures

EXHIBIT 19

considered and an explanation of why this type of mitigation was accepted/rejected. If the Applicant has not considered doing so please address why it has not done so.

A. The building included in BE II's design has already been designed to enclose substantially more project equipment than comparable facilities constructed elsewhere in the United States and, therefore, encloses all project equipment that can reasonably be enclosed. This includes both combustion turbine generators and associated ancillary equipment. The most current depiction of the structures is included in Petitioner's Exhibit 15 ("Revised Site Plans").

Q3. Has the Applicant considered any alternatives to painting the facility using standard industrial painting scheme, i.e. in a creative, visually attractive or artistic fashion?

A. Yes, as noted above, BE II is willing to consider architectural or other artistic treatment of its building, fuel oil storage tank and exhaust stacks. BE II has offered to meet with the architect for 60 Main Street to discuss these design elements and looks forward to working with the developers of the 60 Main Street project in the future.

Q4. Has the Applicant considered environmentally-sensitive "green building" techniques, such as "green roofs" on top of the building and fuel tank, energy saving light fixtures, etc. Please identify what techniques were considered and accepted or rejected.

A. BE II has discussed with its engineers a roof design that would include plantings and/or other green features. Such a design is impractical for the Bridgeport Peaking Facility because the building roof must be capable of being disassembled in the future to allow access to the generating equipment within. Similarly, tank access prohibits the placement of green components atop the tank. BE II's final design will include a review of the feasibility of energy saving lighting consistent with safety and security considerations.

Q5. If the facility is operating on fuel rather than natural gas, when and how often will trucks be delivering fuel to re-supply that source? Please respond specifically by addressing the number of trips per day/week, time of day, day of week, etc.

A. Any estimate of anticipated operation of the proposed facility, whether using natural gas or its backup fuel supply, should consider that new peaking capacity is needed most in the State of Connecticut to satisfy a shortfall of reserve capacity, which is the capability to start up and generate electricity following an unanticipated failure of another generating unit, following a critical transmission outage or in periods of very high electric demand. Such reserves can not be provided if the peaking facility is operating. For this reason, and the fact that simple cycle units such as the proposed facility are inherently less efficient and more costly to operate than combined cycle units such as the Bridgeport Energy Station, anticipated operation is low, most likely less than 1,000 hours per year on any fuel and in no event more than 500 hours per year on distillate fuel oil.

Ultra low sulfur fuel oil is the back-up fuel supply for the proposed facility and will only be used during periods when natural gas can not reasonably be obtained. Pipeline companies typically curtail the supply of natural gas for facilities such as the Bridgeport Peaking Station during the coldest days of winter to enable the continued service of home heating loads. A typical anticipated profile of fuel oil use would be one or two 4-6 hour runs over a period of 3-5 consecutive very cold days. Two daily runs might be necessary to cover both the morning peak (6 – 10 am) and the evening peak (4 – 8 pm). Operation of both units in this manner would consume up to 32,000 gallons of fuel oil per hour, or the capacity of approximately four 8,000 gallon fuel oil trucks each hour.

To achieve the optimal operating availability, BE II will need to request fuel oil deliveries immediately following the commencement of operation. Such deliveries could be expected to begin within one hour of commencement of startup and continue until the fuel oil storage tank is refilled. While the plant may consume up to four truck loads of fuel oil each hour, truck unloading capability will limit truck deliveries to about two each hour. Using the above operating profile, deliveries would likely be made during the hours of 7 a.m. to 3 p.m. to cover the morning operation and 5 p.m. to 1 a.m. to cover the evening operation. During these periods, therefore, we would expect approximately two fuel oil trucks per hour, if the plant's natural gas supply is not available. On most days of operation, however, we anticipate that the facility will operate on natural gas, and, therefore, there will be no fuel oil deliveries.

Q6. Please identify the size of the trucks that will be delivering the fuel to the facility.

A. Fuel oil delivery trucks typically carry approximately 8,000 gallons, but can range in size from 4,000 – 9,000 gallons.

Q7. Has the Applicant undertaken a traffic study to determine the impacts of these fuel trucks on the surrounding neighborhoods and its traffic patterns?

A. At BE II's request, TPA reviewed BE II's anticipated fuel truck volume and routing. TPA's response, which is attached, indicates very insignificant affect on traffic because of the very few trips expected.

Q8. Has the Applicant undertaken either a traffic or safety study to ascertain the route the fuel trucks will need to travel to get from I-95 to the facility?

A. The closest fuel oil terminal is the Motiva terminal located in the City of Bridgeport. We would anticipate Motiva trucks traveling south from downtown Bridgeport on Interstate 95 and exiting onto Lafayette Street. Trucks would then travel south on Lafayette to Atlantic Street, then east on Atlantic to Russell Street and then south to the Russell Street entrance.

After transferring its fuel oil to BE II's storage tank, the truck would exit onto Henry Street and turn immediately north onto Russell Street. The truck would then head

west on Atlantic Street to Main Street, north on Main Street, west on Whiting Street, north on Broad Street, west on Allen Street and finally north on Lafayette Street, where it could return to the terminal via Interstate 95. A map showing the most likely expected route from I-95 to the facility is included in Petitioner's Exhibit 16.

Q9. Has the Applicant considered alternatives to avoid routing fuel trucks in surrounding residential areas in which such trucks pose a greater risk to children and residents?

A. The route identified above is both the most direct route and minimizes routing trucks through residential areas.

Q10. Specifically, is there a route that the fuel trucks could take which would avoid them traveling on Henry Street, and near the large residential development that has been approved there (but has not yet been built)?

A. The route identified above would require trucks to travel less than one hundred feet on Henry Street prior to turning north onto Russell Street. Due to site constraints, the fuel oil storage tank has been located in the only location available. Truck travel on this limited stretch of Henry Street, therefore, cannot safely be avoided.

Q11. What is the Applicant's evacuation plan for the facility in case of a hurricane?

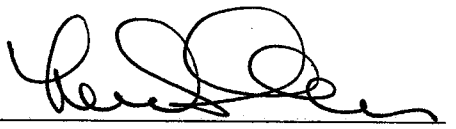
A. The proposed Bridgeport Peaking Station is not anticipated to have any operating personnel to evacuate. It will be operated from the existing Bridgeport Energy Station.

Q12. How would emergency vehicles access the facility in case of a fire or catastrophic event?

A. Emergency vehicles would access the plant via its primary entrance on Russell Street.

Respectfully Submitted,

BRIDGEPORT ENERGY II, LLC

By 

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February 22, 2008
Via E-mail: BWheatley@LSPower.com

D. Blake Wheatley, General Manager
Bridgeport Energy II, LLC
400 Chesterfield Center, Suite 110
St. Louis, Missouri 63017

Re: Bridgeport, CT

Dear Sir:

TPA has not conducted a formal "traffic study" for the proposed Bridgeport Peaking Station. However, a review of Bridgeport Energy II's truck traffic projections indicates very insignificant affect on traffic because of the very few trips expected to and from the Plant. Our traffic analysis concerned itself with the traffic routes as indicated below.

On February 21, 2008, we surveyed the geometric condition and traffic flow along the proposed routing and found that the routes indicated below to be the most favorable, with the least impact, especially to residences of the City of Bridgeport.

From I-95 to the plant: After exiting I-95 onto Lafayette Street, trucks would then travel south on Lafayette to Atlantic Street, then east on Atlantic to Russell Street and then south to the Russell Street entrance of the new plant.

From the plant back to I-95: After transferring its fuel oil to the plant's storage tank, the truck would exit onto Henry Street and turn immediately north onto Russell Street. The truck would then head west on Atlantic Street to Main Street, north on Main Street, west on Whiting Street, north on Broad Street, west on Allen Street and finally north on Lafayette Street, where it could return to the terminal via Interstate 95.

Respectfully,

TPA Design Group

Humbert V. Sacco, Jr., P.E.
Chairman

HVS/jgs
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been mailed, postage prepaid, this 26th day of February, 2008 to:

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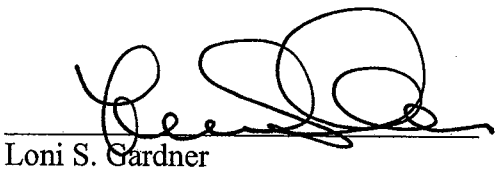

Loni S. Gardner