

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

**Petition of BNE Energy Inc. for a
Declaratory Ruling for the Location,
Construction and Operation of a 3.2 MW
Wind Renewable Generating Project on
New Haven Road in Prospect,
Connecticut (“Wind Prospect”)**

Petition No. 980

February 9, 2011

FAIRWINDCT, INC.’S INTERROGATORIES TO BNE ENERGY INC.

FairwindCT, Inc. (“FairwindCT”) requests that the petitioner, BNE Energy Inc. (“BNE”) respond to the following interrogatories:

1. Please provide the GPS coordinates of each proposed turbine location.
2. Please provide the approximate date on which you or your representatives first informed members of the Siting Council and/or its staff that you would be seeking the Council’s approval for this project.
3. Please provide support, including citations, for your statement on page 6 of your Shadow Flicker Analysis report that “Several communities in the United States have adopted a 30-hour annual limit for shadow flicker occurrences.”
4. Please explain the methodologies used by the “[s]everal communities in the United States [that] have adopted a 30-hour annual limit for shadow flicker occurrences” to analyze, monitor and enforce that 30-hour annual limit.
5. Please define the term “appropriate setbacks” by feet or meters as used in your responses to questions 5 and 6 the Council’s first set of interrogatories, dated February 3, 2011.
6. What are “the setbacks proposed by BNE” discussed in your response to question 26 the Council’s first set of interrogatories, dated February 3, 2011? Please define those setbacks by feet or meters.

7. In your response to question 2 of the Council's first set of interrogatories, dated February 3, 2011, you state that "[i]t is unlikely that GE's 1.6-100 Class III turbine would be suitable for this Site." In your response to question 2 of the Council's first set of interrogatories, dated February 3, 2011, you state that "BNE has determined . . . that two GE 1.6 MW wind turbines with 82 meter diameter blades may be sited on the Property as proposed." Please confirm that you are now seeking approval for two GE 1.6-82.5 turbines rather than two GE 1.6-100 turbines.

8. Please provide a copy of the Mechanical Loads Assessment conducted by GE and described in your responses to questions 1, 2 and 6 of the Council's first set of interrogatories, dated February 3, 2011.

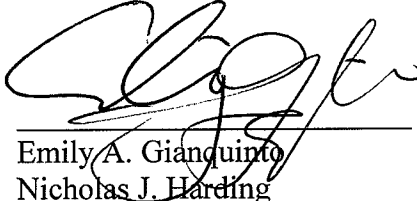
9. How many wind turbine projects in the Northeast that are presently operating have annual capacity factors of approximately 30 percent? Please identify those projects by location, number of turbines and type of turbines (size and model).

10. How many wind turbine projects in the United States that are presently operating have annual capacity factors of approximately 30 percent? Please identify those projects by location, number of turbines and type of turbines (size and model).

11. On February 3, 2011, Mr. Corey testified at a hearing before the Energy and Technology Committee of the Connecticut legislature and promised to provide a written submission detailing the "specific" number of jobs that will be created by Wind Prospect. Please provide the specific number of jobs that will be created.

12. On February 3, 2011, Mr. Corey testified at a hearing before the Energy and Technology Committee of the Connecticut legislature and stated that GE has "lots of rules" regarding setbacks that BNE has followed. Please provide copies of those rules.

13. The "Wind Assessment" included in the petition is only a summary of data collected from the meteorological tower on the Site. Please provide the raw data upon which the summary assessment relies, in native electronic format.

By: 
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CERTIFICATION

I hereby certify that a copy of the foregoing document was delivered by first-class mail and e-mail to the following service list on the 9th day of February, 2011:

Carrie L. Larson
Paul Corey
Jeffrey J. Tinley
Hon. Robert J. Chatfield
Thomas J. Donohue, Jr.
John R. Morissette
Christopher R. Bernard
Joaquina Borges King



Emily Gianquinto