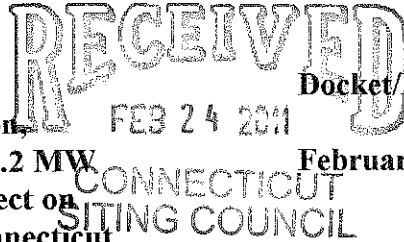


STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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

Docket/Petition No. 980

February 23, 2011



**SAVE PROSPECT CORP'S SUPPLEMENTAL RESPONSE
TO BNE'S INTERROGATORY #4**

Save Prospect Corp. hereby submits its further response to BNE's Interrogatory #4 and BNE's "Reply", dated February 22, 2011, to Save Prospect Corp.'s initial response to BNE's Interrogatory #4. As a further response to BNE's Interrogatory #4, Save Prospect Corp. states:

1. Save Prospect Corp. does not have a membership list. Save Prospect Corp. has an e-mail and mailing list of hundreds of persons who have expressed interest in receiving information from Save Prospect Corp.
2. The persons on the e-mail and mailing list were not asked to join Save Prospect Corp as "members" as a condition of being included on the list.
3. The persons on the e-mail and mailing list did not give Save Prospect Corp. permission to publicly disclose their names and addresses.
4. Save Prospect Corp. is hardly unique in this regard, as there are many not-for-profit entities that do not require "membership" as a condition of including persons on a mailing list or as a condition of accepting donations or financial support.

Those who are included on Save Prospect Corp.'s mailing list may or may not agree with all of the views expressed by Save Prospect Corp. Many of those included on Save Prospect Corp.'s mailing list have important individual interests at stake and important individual points of view, such as residents whose homes are in close proximity to the proposed wind turbines, while others may live miles away and have a general interest in the matters currently before the Siting Council.

5. It is cannot be true, for example, that residents who live within several blocks of the proposed industrial turbine site and are concerned about the direct impacts on the peaceful enjoyment of their homes, the value of their homes and potential negative health effects on themselves and family members have lost their fundamental right to be heard by the Siting Council merely because they have asked to be included on Save Prospect Corp.'s e-mail and mailing list. BNE's suggestion to the contrary should be rejected out of hand.
6. Save Prospect Corp. rejects BNE's suggestion that it seeks an unfair advantage. For affected residents to speak their minds and advocate their own position neither advantages nor disadvantages the parties to this proceeding. Rather, such expressions represent free speech and democracy in action.
7. Save Prospect Corp. previously provided BNE the names and addresses of its officers and directors. Save Prospect Corp also has submitted pre-filed testimony of more than a dozen residents who will not speak at the Siting Council's public comment sessions.
8. In order to further address this issue, Save Prospect Corp has sent an e-mail

communication to all of the persons on its e-mail list asking them to state affirmatively whether they wish to become members of Save Prospect Corp., and further advising them:

- a. if they choose to become members, they will not be permitted to speak on their own behalf at the Siting Council's public comment sessions in this matter;
- b. if they choose to become members, Save Prospect Corp. will speak on their behalf in these proceedings; and
- c. Save Prospect Corp. may be required to publicly disclose the names and addresses of those who respond by stating that they wish to be considered members.

**Respectfully submitted,
SAVE PROSPECT CORP**

By: 

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CERTIFICATION

This is to certify that a copy of the foregoing has been delivered via electronic mail and/or first class mail, postage pre-paid, on this 23rd day of February, 2011 to the following:

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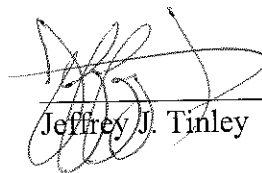
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