

**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 28, 2011**

**FAIRWINDCT, INC.’S THIRD SET  
OF INTERROGATORIES TO BNE ENERGY INC.**

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

1. Please provide a copy of the agreement between BNE and GE Energy (“GE”) that you claim prevents public disclosure of GE’s rules, policies and procedures regarding setbacks for its turbines.
2. If you object to Interrogatory No. 1, please provide a copy of the provision or provisions of the agreement between BNE and GE that specifically relate(s) to confidential and proprietary information and identifies the setback information as such.
3. Is the “confidential and proprietary” setback information that you filed under seal with the Council available on GE’s website?
4. Is the “confidential and proprietary” setback information that you filed under seal with the Council the only information Mr. Corey was referring to in his testimony at a hearing before the Energy and Technology Committee of the Connecticut legislature when he stated that GE has “lots of rules” regarding setbacks that BNE has followed? If not, please identify and provide copies of any additional setback information to which Mr. Corey was referring.

5. Please provide a copy of the agreement between BNE and GE that you claim prevents public disclosure of GE's Mechanical Loads Assessment.
6. If you object to Interrogatory No. 5, please provide a copy of the provision or provisions of the agreement between BNE and GE that specifically relate(s) to confidential and proprietary information and identifies the Mechanical Loads Assessment as such.
7. Please provide a copy of the noise emission characteristics of the GE 1.6 MW turbines.
8. Please provide a copy of any other GE materials relevant to the proper siting of its 1.6 MW turbines, guidelines and policies, including but not limited to materials regarding ice and blade throw, fire safety, noise, wildlife impacts, fall zones and proper siting to avoid turbulence.
9. Please state the maximum width of the blades of the GE 1.6-100 and the GE 1.6-82.5.
10. In your February 16, 2011 response to Question 82 of Save Prospect's Second Set of Interrogatories, you stated that off-site grading will be necessary "in the area between the end of the pavement on Kluge Road and the project property boundary." You then state that you have "engaged the Town of Prospect in discussions to obtain permission." Please describe the steps you have taken to "engage" the Town of Prospect in such discussions.
11. Have you received permission from the Town of Prospect to do the necessary off-site grading work you describe in your February 16, 2011 response to Question 82 of Save Prospect's Second Set of Interrogatories? If so, who granted permission? When? If permission was granted in writing, please provide a copy.

12. If you do not receive permission from the Town of Prospect to do the necessary off-site grading work you describe in your February 16, 2011 response to Question 82 of Save Prospect's Second Set of Interrogatories, how will you take appropriate erosion control measures on the Site?

13. In your February 16, 2011 response to Question 89 of Save Prospect's Second Set of Interrogatories, you stated that "[r]eferences to basins on other sheets are typographical errors and will be corrected." Please provide those corrected sheets.

14. In his prefiled testimony, Mr. Koning references a review of the "specifications and guidelines required to prepare a proper layout of the job site," which "included information on the equipment used to transport the components to the erection location and their specific requirements for the road surface and the clearances required" and information "on the cranes used for the erection and installation process." Please provide a copy of all of the information described by Mr. Koning and reviewed by any Zapata personnel.

15. Please provide GPS coordinates of each noise monitoring location identified in your Noise Evaluation.

16. If your consultant monitored noise at any other location, please provide GPS coordinates of each additional location and provide the data collected.

17. Please provide copies of any documents related to your Scoping Meeting with CL&P regarding Wind Prospect.

18. Please provide copies of any documents related to your Application Request and Application Review with CL&P regarding Wind Prospect.

19. Has the Feasibility Study with CL&P regarding Wind Prospect been completed?

If so, please provide a copy of that study. If not, when do you expect it to be completed?

20. Has the System Impact Study with CL&P regarding Wind Prospect been

completed? If so, please provide a copy of that study. If not, when do you expect it to be completed?

21. Has the Transmission Study with CL&P regarding Wind Prospect been

completed? If so, please provide a copy of that study. If not, when do you expect it to be completed?

22. Please describe any communications you have had with the owner and/or operator

of the cell tower located on the Site, and provide copies of any written communications.

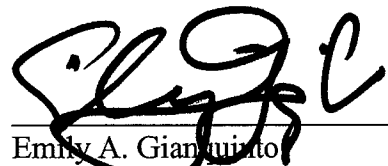
23. Do you have approval from GE for your proposed site layout? If so, please

provide a copy of that approval. If such approval was not in writing, please state the date on which you received approval and identify the individual(s) who provided you with such approval.

24. If you do not have approval from GE for your proposed site layout, when do you

expect to get such approval?

By:



Emily A. Gianquinto  
Nicholas J. Harding  
Reid and Riege, P.C.  
One Financial Plaza, 21st Floor  
Hartford, CT 06103  
Tel. (860) 278-1150  
Fax. (860) 240-1002

**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 28th day of February, 2011:

Carrie L. Larson  
Paul Corey  
Jeffrey J. Tinley  
Hon. Robert J. Chatfield  
Thomas J. Donohue, Jr.  
Eric Bibler  
Andrew W. Lord  
Cindy Gaudino

and sent via email only to:

John R. Morissette  
Christopher R. Bernard  
Joaquina Borges King

  
Emily Giannino