

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

March 23, 2011

SAVE PROSPECT CORP.'S THIRD SET OF INTERROGATORIES TO BNE

Save Prospect Corp., a party to these proceedings, respectfully request that petitioner, BNE Energy, Inc., respond to the following interrogatories:

108. Please state whether BNE is in possession of a fully executed copy of the confidentiality agreement that was filed under seal with the Siting Council. If so, please state the name of the person who signed on behalf of GE and file a copy of the fully executed agreement with the Siting Council.
109. Please provide the names and titles of all GE employees who BNE communicated with and/or provided data to assist GE in its preparation of the Mechanical Loads Assessment presently filed under seal with the Siting Council.
110. Identify all material that GE requested from BNE for the Mechanical Loads Assessment presently filed with the Siting Council.
111. Did BNE provide all of the material identified in the preceding interrogatory to GE?
112. What are the GPS coordinates for the locations of northern and south turbines as reflected in the revised site plans attached to Mr. Cline's testimony dated March 8, 2011?
113. Did BNE provide Mr. Cline's testimony and related exhibits to GE?
114. Did BNE provide Mr. Carboni's testimony and related exhibits to GE?
115. Did BNE provide Mr. Klein's testimony and related exhibits to GE?
116. Did BNE provide Mr. Pressman's testimony and related exhibits to GE?

117. If the answer to the preceding interrogatory is in the affirmative, when did BNE provide this material to GE?
118. Did GE revise the Mechanical Loads Assessment based on the revised site plans attached to Mr. Cline's testimony? If so, do you have a copy of the revised MLA?
119. If BNE has copy of the revised MLA, please file a copy with the Siting Council.
120. Did GE prepare a new Mechanical Loads Assessment based on the revised site plans attached to Mr. Cline's testimony? If so, do you have a copy of the new MLA?
121. If BNE has a copy of the new MLA, please file a copy with the Siting Council.
122. Please file a copy of any and all MLAs performed for this site with the Siting Council.
123. Please identify the line(s) and page(s) on which BNE claims GE's approval of the proposed siting of the turbines appears in the MLA or in any other document.
124. Has GE reviewed the new location of the north turbine in BNE's revised plans?
125. Has GE approved this location?
126. Has GE approved the spacing of the turbines as set forth in BNE's revised plans?
127. Please identify by date, author, recipient and description, the document(s), if any, in which any approvals by GE of the location or spacing of the turbines is set forth.

**Respectfully submitted,
SAVE PROSPECT CORP**

**By: /s/ Anthony J. Interlandi
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SERVICE LIST

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 March, 2011 to the following:

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