

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 REQUEST FOR PERMISSION TO SERVE
ADDITIONAL INTERROGATORIES ON BNE ENERGY, INC.**

Save Prospect Corp. ("SPC") hereby requests permission to serve BNE Energy Inc. ("BNE") with additional interrogatories in the manner set forth in the form attached hereto as Exhibit A. On March 3, 2011, Mr. Corey testified that the proposed project meets GE's setback requirements and referred SPC's counsel to GE's Mechanical Loads Assessment filed under seal with the Siting Council. Undersigned counsel represents that he recently completed his review of BNE's revised site plans (attached as Exhibit 1 to the Supplemental Pre-filed Testimony of Melvin L. Cline dated March 8, 2011) and Protected Materials. SPC's proposed additional interrogatories are necessary to evaluate the accuracy and completeness of GE's Mechanical Loads Assessment, which appears to rely on data provided by BNE in 2010. For this reason, SPC respectfully requests that the Council allow it to serve additional interrogatories on BNE and that answers are received on or before March 30, 2011.

**Respectfully submitted,
SAVE PROSPECT CORP**

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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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