

**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 24, 2011

**SAVE PROSPECT CORP'S JOINDER IN FAIRWINDCT INC.'S
RESPONSE REGARDING PETITIONER BNE ENERGY INC.'S MOTION
FOR PROTECTIVE ORDER AND MOTION TO FILE UNDER SEAL**

Save Prospect Corp ("SPC") hereby joins in support of the Response Regarding Petitioner BNE Energy Inc.'s Motion for Protective Order and Motion to File Under Seal filed by FairwindCT on February 23, 2011 (the "Response"). In addition to the arguments set forth in FairwindCT's Response, SPC asserts the following:

1. SPC propounded interrogatories to BNE Energy, Inc. ("BNE") on January 21, 2011 (the "First Set") and an additional set on February 9, 2011 (the "Second Set").
2. On February 16, 2011, pursuant to the deadlines set by the Council, BNE filed its answers to SPC's interrogatories. In response to one interrogatory in the First Set, BNE raised no objection but claimed the information requested was confidential and being filed with the Council pursuant to a motion for protective order.
3. The relevant interrogatory and answer is the following:

Q27. The petition includes a chart titled "Annual Average Capacity Factor - and Energy Yield Estimates for several turbine types using 14.7 months of measured wind data." The chart includes a footnote which states "This turbine does not meet fall zone requirements from the project boundary, and further investigation is necessary to mitigate this requirement." State

the fall zone requirements and blade throw and ice throw distances for each turbine listed or under consideration for this site and identify the source of all such information.

- A27. BNE followed GE's recommended setbacks for wind turbines. **The document is confidential and being filed pursuant to protective order.** See BNE response to Siting Council interrogatory Q31 dated February 16, 2011. (emphasis added).
4. On February 16, 2011, BNE filed its motion for protective order and to file under seal and related documents.
5. SPC hereby adopts as if set forth herein the arguments and requested relief set forth in FairwindCT's Response.

**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 24th day of February, 2011 to the following:

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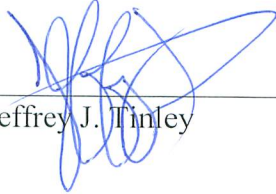
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