## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

Petition of BNE Energy Inc. for a Declaratory Ruling for the Location, Construction and Operation of a 4.8 MW Wind Renewable Generating Project on Flagg Hill Road in Colebrook, Connecticut ("Wind Colebrook South")

Petition No. 983

and

Petition of BNE Energy Inc. for a
Declaratory Ruling for the Location,
Construction and Operation of a 4.8 MW
Wind Renewable Generating Project on
Winsted-Norfolk Road (Route 44) in Colebrook,
Connecticut

Petition No. 984

March 7, 2011

## KRISTIN M. MOW AND BENJAMIN C. MOW INTERROGATORIES TO BNE ENERGY, INC.

KRISTIN M. AND BENJAMIN C. MOW, jointly, ("the Mows") a Party in the above-referenced petitions, hereby requests that the petitioner, BNE Energy Inc. ("BNE") respond to the following interrogatories as to both petitions:

**Definitions:** If not otherwise identified, "Project," "property" or "site" when used herein refers to either one or both of the sites proposed for Petition #983 and Petition #984. A question with reference to the "project," the "property" or the "site" shall require an answer applicable to either Petition affected by the subject of the question, or to both, if an answer is applicable to the site of both Petitions.

- 1. Please provide the visibility areas for the maximum heights of your proposed wind turbine towers, including the turbine blades, for both projects, as related to visibility from the home of the Mows at 12A Greenwoods Turnpike, Colebrook CT.
- 2. Please provide copies of the calculations of these visibility readings, as related to both of your proposed sites.

- 3. Please describe any specific actions BNE will take to minimize the visual (including but not limited to flicker effect), auditory, traffic, safety and other impacts of the proposed operation of this project on the property of the Mows at 12A Greenwoods Turnpike, Colebrook CT.
- 4. Has BNE engaged in any wetlands assessments of either property site, or are any planned? If so, please describe each completed or ongoing wetlands assessment, provide an estimated date of completion, if not complete, and a copy of the assessment, if complete.
- 5. What precautions are being planned and will be taken to prevent disruption of or adverse impact upon Mill Brook, which is located on the property of at least one of the projects? Please identify how BNE plans to control construction runoff, contamination of the stream how BNE plans to protect the wildlife that depend on the stream.
- 6. Please identify BNE's plans for remediation or retention of any wetlands identified on either site.
- 7. What studies has BNE undertaken to determine the effect of both projects on the property values of homes of families living within 1000 feet of each project? Please identify any such studies, the date of the study, the entity performing the study, and the specifics of effects upon the property of the Mows at 12A Greenwoods Turnpike, Colebrook.
- 8. What effects will blasting or drilling have on the water wells for families living within 1,000 feet of both projects, and what actions will BNE undertake to remediate or minimize those effects or provide alternate sources of water to the affected families?
- 9. Please identify precautions BNE is taking to prevent ice being thrown within 1,000 feet of each tower.
- 10. Please identify the distance the red flashing lights on the windmills can be seen in all directions and the impact of those lights on homes within 1,000 feet of each nearest windmill tower. What action will BNE take to lesson the effect of these flashing lights during night-time on homes within 1,000 feet?

- 11. Since 2008, has any representative of BNE communicated orally, in writing, via email, other electronic communication or otherwise with any Colebrook Inland-Wetlands Commission member regarding this project? If so, please provide the type and date of each communication, the name of the BNE representative involved and the Colebrook Inland-Wetlands Commission member involved.
- 12. Please provide the distance from each turbine as depicted on your site plans for each Petition to the property line, and to the home, respectively, of the Mows at 12A Greenwoods Turnpike, Colebrook CT.
- 13. Please provide the dates representative(s) from Zapata, Inc. visited each site Petition #983 and Petition #984 to perform field work in preparation for developing the documents which support the petitions. Please identify by name the Zapata representative(s) who visited each site, the dates of the visit(s) and the length of time the representative(s) were on each site.
- 14. Please identify specific actions BNE will take to minimize the impact of the wind turbines, if approved, on persons afflicted with Vertigo, and specifically, but not only, a juvenile diagnosed with Benign Paroxysmal Vertigo living within 1,000 feet of one of your proposed turbines.

Respectfully Submitted, Knistin and Benjamin Mow

BY:

Richard T. Reshoy Law Office of Richard T. Roznoy

School Street P.O. Box 850

East Granby, CT 06026 office: 860-844-8769 cell: 860-874-4131

fax: 860-653-2221 email: RTR@RoznoyLaw.com

juris: 410169

## CERTIFICATION

I hereby certify that a copy of the foregoing document was sent by U.S. mail to the following service list on this the  $7^{th}$  day of the month of March 2011:

Carrie L. Larson
Paul Corey
Emily A. Gianquinto
Nicholas J. Harding
Thomas D. McKeon
David M. Cusick
John R. Morissette
Christopher R. Bernard
Joaquina Borges King
David R. Lawrence and Jeannie Lemelin
Walter M. Zima and Brandy Grant

Richard T. Rozyby Commissioner of the Superior Court

4