

**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

March 3, 2011

**ROBIN L. HIRTLE’S INTERROGATORIES TO
BNE ENERGY INC.**

Robin L. Hirtle, a Party in the above-referenced petition, hereby requests that the petitioner, BNE Energy Inc. (“BNE”) respond to the following interrogatories:

1. As to the roadway depicted on your site plans, Petition Vol. II, Exhibit F, pages C-002 and following, providing access to the site on which the three proposed wind towers are to be placed, please describe when it is scheduled to be substantially completed so as to be available for travel.
2. Please describe how you intend you access the site prior to the time the roadway depicted on your site plans, Petition Vol. II, Exhibit F, pages C-002 and following, is substantially completed and ready for travel.
3. At the Town of Colebrook Zoning Board of Appeals public hearing on February 4, 2009 regarding the permit for the “MET” test tower at 29 Flagg Hill Road, Colebrook, BNE presented a map or survey entitled “Site Plan prepared for BNE Energy, Inc., 29 Flagg Hill Road Date 11/6/08” drafted by Connecticut Consulting Engineers, LLC, of Meriden, CT. Please describe why BNE did not utilize the access roadway depicted on that survey as an “Existing Access Road” for access to the MET test tower.
4. Please provide the visibility areas for the maximum heights of your proposed wind turbine towers, including the turbine blades, as related to visibility from the home of Robin L. Hirtle at 29-A Flagg Hill Road.
5. Please provide copies of the calculations of these visibility readings.

6. 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 Robin L. Hirtle at 29-A Flagg Hill Road.

7. Are any wetlands assessments of the property ongoing? If so, please describe each ongoing wetlands assessment, provide an estimated date of completion, and identify BNE's plans for remediation or retention of wetland on the site.

8. Since 2008, has any representative of BNE communicated — orally, in writing, via email or other electronic communication or otherwise — with any Colebrook Inland-Wetlands Commission member regarding this project? If so, please provide the approximate type and date of each communication, the name of the BNE representative involved and the Colebrook Inland-Wetlands Commission member involved.

9. Please provide the distance from each turbine as depicted on your site plans, Petition Vol. II, Exhibit F, pages C-002 and following, to the property line and to the home of Robin L. Hirtle at 29-A Flagg Hill Road.

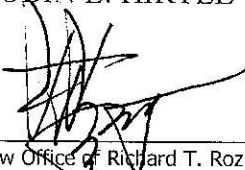
10. Please provide the distance from the proposed "Facility Support Building" as depicted on your site plans, Petition Vol. II, Exhibit F, pages C-002 and following, to the property line and to the home of Robin L. Hirtle at 29-A Flagg Hill Road.

11. Please provide the distance from the point in the access road, as depicted on your site plans, Petition Vol. II, Exhibit F, pages C-002 and following, which is nearest to the property line and to the home of Robin L. Hirtle at 29-A Flagg Hill Road.

12. Please provide the dates representative(s) from Zapata, Inc. visited the site to perform field work in preparation for developing the documents which support the petition. Please identify by name the Zapata representative(s) who visited the site, the dates of the visit(s) and the length of time the representative(s) were on site.

Respectfully Submitted,
ROBIN L. HIRTLE

BY:

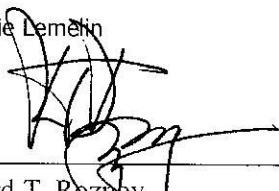


Law Office of Richard T. Roznoy
School Street
P.O. Box 850
East Granby, CT 06026
office: 860-844-8769
cell: 860-874-4131
fax: 860-653-2221
email: RTR@RoznoyLaw.com
juris: 410169

C E R T I F I C A T I O N

I hereby certify that a copy of the foregoing document was sent by U.S. mail to the following service list on this the 3d 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



Richard T. Roznoy
Commissioner of the Superior Court