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 Winsted-Norfolk Road in Colebrook, Connecticut ("Wind Colebrook North") Petition No. 984

April 25, 2011

PETITIONER BNE ENERGY INC.'S INTERROGATORY RESPONSES TO TOWN OF COLEBROOK'S SECOND SET OF INTERROGATORIES

Petitioner BNE Energy Inc. ("BNE") submits the following responses to the Second Set of Interrogatories issued by the Town of Colebrook dated April 6, 2011:

- Q1. In your Petition for a Declaratory Ruling, you indicate that as a benefit of the project the Town of Colebrook will receive "significant tax revenue"; please state the approximate dollar amount that such tax revenue would have been for the 2010-2011 fiscal year if the three wind turbines, other improvements associated therewith and the land dedicated thereto had been in service on October 1, 2009.
- A1. BNE objects to this interrogatory because economic issues including tax revenue in general are outside the scope of the Siting Council's jurisdiction as defined by Connecticut General Statutes §§ 16-50g and 16-50k. Subject to this objection and without waiving the same, BNE retained the Connecticut Center for Advanced Technology, Inc. ("CCAT") to provide a reasonable estimate of tax revenue from the project. Those calculations are contained in the pre-filed testimony of Joel M. Rinebold dated March 15, 2011.
- Q2. If the three wind turbines, other improvements associated therewith and the land dedicated thereto had been in service on October 1, 2010, what would the fair market value of such assets have been?
 - A2. See response to interrogatory 1.
- Q3. Do you expect that the fair market value of the three wind turbines, other improvements associated therewith and the land dedicated thereto as of the date the same are put into service would decrease in each assessment year thereafter and, if so, by what factor?
 - A3. See response to interrogatory 1.

- Q4. Why have you not attempted to enter into a Host Community Agreement/Payment in Lieu of Taxes Agreement with the Town of Colebrook, which would address, inter-alia, payments to the Town should there be changes to Connecticut law resulting in the three wind turbines, other improvements associated therewith, the land dedicated thereto (or any of the foregoing) becoming exempt from municipal assessment/taxation?
- A4. Currently, ratepayers are paying out of state companies millions of dollars per year to comply with Connecticut Class I Renewable Portfolio Standards. BNE believes that some of those dollars should stay in Connecticut, support the development of in-state Class I renewable energy projects, and benefit local communities in the form of tax revenue, economic development, green jobs and green renewable energy produced locally. BNE is committed to being a good corporate citizen to the Town of Colebrook and is willing to enter into a Host Community Agreement/Payment in Lieu of Taxes Agreement with the Town of Colebrook.
- Q5. If you do not enter into a Host Community Agreement/Payment in Lieu of Taxes Agreement with the Town of Colebrook during the course of these proceedings, do you consent to the inclusion by the Siting Council as a condition of any approval that the Town of Colebrook be financially protected should there be changes to Connecticut law resulting in the three wind turbines, other improvements associated therewith, the land dedicated thereto (or any of the foregoing) becoming exempt from municipal assessment/taxation?

A5. See response to interrogatory 4.

BNE ENERGY INC.

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Certification

This is to certify that a copy of the foregoing has been mailed this date to all parties and intervenors of record.

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