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September 15, 2021

Melanie A. Bachman, Esq.  
Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re: Petition 1406A – Opposition to Motion to Compel and Motion to Strike

Dear Ms. Bachman:

NuPower Bridgeport FC, LLC (“NuPower”) hereby submits to the Connecticut Siting Council (“Council”) its Opposition to Allco Renewable Energy Limited’s Motion to Compel Interrogatory Responses and Motion to Strike. An original and fifteen (15) copies of NuPower’s Opposition will be hand delivered to the Council.

Should you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosures

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STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Doosan Fuel Cell America, Inc. Petition for a	:	Petition No. 1406A
declaratory ruling, pursuant to Connecticut General	:	
Statutes §4-176 and §16-50k, for the proposed	:	
construction, maintenance and operation of a grid-side	:	
9.66-megawatt fuel cell facility and associated	:	
equipment to be located at 600 Iranistan Avenue,	:	
Bridgeport, Connecticut, and associated electrical	:	
interconnection to the United Illuminating Company's	:	
existing Congress Street Substation	:	September 15, 2021

Opposition of NuPower Bridgeport FC, LLC to Allco Renewable Energy Limited's  
Motion to Compel Interrogatory Responses and Motion to Strike

NuPower Bridgeport FC, LLC (“NuPower”) hereby opposes the Motion to Compel Interrogatory Responses from to [sic.] NuPower Bridgeport FC, LLC and Doosan Fuel Cell America, Inc. and Motion to Strike (the “Motion to Compel”) filed by Allco Renewable Energy Limited (“Allco”) in which Allco requests that the Council issue an order compelling NuPower to provide complete responses to various of the interrogatories served on NuPower by Allco or strike all claims and assertions relating to the benefits of the Project that are not explained to Allco’s satisfaction. NuPower has provided sufficient and appropriate responses to the Allco interrogatories given the nature of the petition pending before the Council and the limited scope of Allco’s participation in this proceeding. Any further requested information lies outside of the scope of that which is either relevant and/or reasonably tailored to lead to the discovery of admissible evidence. Accordingly, NuPower requests that the Council deny Allco’s Motion to Compel.

Respectfully Submitted,

NuPower Bridgeport FC, LLC



By: \_\_\_\_\_

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