

Witness: **Andrew J. Bazinet**

Question Larkin-1:

What does the word local mean? What distance best describes local?

Response:

CPV responded to this question on pages 524-526 of the transcript for the February 10, 2015 hearing. A typical dictionary definition of local is “characteristic of or confined to a particular place or district.”

Witness: Andrew J. Bazinet

Question Larkin-2:

Would you say the Larkin acreage is local? Assuming so, what will the positive impacts and the negative impacts of your 805 MW power plant be on our acreage?

Response:

Yes, the Larkin acreage would be considered "local." Local impacts were discussed in depth on pages 507-526 of the February 10, 2015 transcript and elsewhere in the record.

Witness: Andrew J. Bazinet

Question Larkin-3:

Do you consider the stated \$34 of annual savings to us, the local rate payers receiving the brunt of this plant effects, as worth the impositions of your power plant?

Response:

The \$34 of annual savings for the average residential customer are attributable entirely to the energy savings resulting from CPV Towantic's market-leading heat rate. Businesses and governmental entities (including municipalities), which use far more electricity than the average residential customer, will experience many multiples of this savings amount. On their own, the energy savings vastly underestimate the total savings that will be realized by ratepayers as a result of the Project's operation. Beyond energy savings, CPV Towantic will benefit ratepayers by:

1. Reducing aggregate capacity payments to generators by virtue of displacing the next highest bidder in ISO-NE's Forward Capacity Auction. Because the prices submitted by bidders who did not clear the auction are not revealed it is not possible to definitively quantify total capacity payment savings. However, assuming that the auction would have cleared closer to the Offer Review Trigger Price for Combustion Turbines (the other new conventional generating resources clearing the auction were combustion turbines) of \$13.42 instead of \$9.55 per kilowatt-month, CPV Towantic will contribute capacity payment savings in excess of \$1.39B system-wide in its first year of operation alone.
 - $\sim 34,000 \text{ MW} \times (\$13.42 - \$9.55 / \text{kW-Mo}) \times 12 \text{ months} \approx \1.39B
2. Increasing economic activity. According to the University of Connecticut's Center for Economic Analysis (CCEA) study, CPV Towantic will generate more than \$7.9B in new personal income for Connecticut residents over the next 25 years via direct, indirect and induced economic activity. During the construction and operational phases CCEA estimates that the Project will create more than 2,300 and 1,800 jobs, respectively.
3. Reducing regional emissions of air pollutants. Per Exhibit 2 of the Petition (the Concentric Report), adding a highly-efficient, natural gas-fueled facility like CPV Towantic will result in the higher-polluting, less-efficient power plants (many of

which are solely fueled by fuel oil) across New England operating less. Because criteria pollutants like NO_x and SO_x and greenhouse gas (GHG) pollutants like CO₂ are regional pollutants, local residents will receive the benefit of reduced operation of less efficient generators, regardless of where they are located within the ISO-NE footprint.

Considering that the Project's potential impacts will be mitigated by its permit and siting requirements, the above-mentioned benefits will vastly outweigh any potential impact associated with the development and operation of the Project.

Witness: Andrew J. Bazinet

Question Larkin-4:

What is the impact of the billion dollar income this plant will generate for the benefit of its owners?

Response:

CPV Towantic LLC ("CPV") objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Connecticut Siting Council's ("Council") statutory authority under the Public Utility Environmental Standards Act, Conn. Gen. Stat. § 16-50g et seq. (the "Act") nor within the scope of a proceeding under Conn. Gen. Stat. § 4-181a(b) of the Uniform Administrative Procedure Act ("UAPA").

Witness: Andrew J. Bazinet

Question Larkin-5:

With annual income of this magnitude, do you think this project is more about the money than anything else, particularly since the power isn't needed here in Connecticut nor is it to be utilized here in Connecticut?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Without waiving its objection, CPV responds to the portion of the question claiming that the power is not needed in Connecticut as follows:

CPV disagrees with the statement that "the power is not needed in Connecticut." The Facility will help to meet Connecticut's electric needs and provide substantial public benefits to Connecticut residents, businesses and municipalities. The Applicable Statute requires the Council to consider the public benefits (a less strict standard than public need) of proposed electric generation facilities. These public benefits of this proposed Facility include lower energy prices and capacity prices for all Connecticut electric customers, enhanced electric reliability, economic development benefits, reduced state and regional air emissions, and numerous other public benefits. The record fully describes these benefits. Additionally, many of these benefits are recognized in the DEEP's January 28, 2015 letter to the Council and in the DEEP's draft Integrated Resource Plan. Exhibit 1 to this Response summarizes the public benefits of this Facility as recognized by the DEEP.

Witness: **Danielle Powers**
 Tanya Bodell

Question Larkin-6:

Where will the plant's power be sold?

Response:

The output from the Towantic generating facility will be sold into the competitive wholesale energy markets in New England. This output will be used to reliably serve customers both in Connecticut as well as the New England region. The energy generated from this facility will not only lower prices in Connecticut and in New England, it will also provide important local and regional reliability benefits.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-7
Page 1 of 1

Witness: N/A

Question Larkin-7:

Why did you attempt to build a power plant in Walpole Massachusetts?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-8
Page 1 of 1

Witness: N/A

Question Larkin-8:

How many megawatts was that proposed plant to be?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-9
Page 1 of 1

Witness: N/A

Question Larkin-9:

Why not 805 megawatts at that location?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Witness: N/A

Question Larkin-10:

What were the reasons why you did not succeed in permitting a plant in Walpole, Mass.?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-11
Page 1 of 1

Witness: N/A

Question Larkin-11:

Would it be correct to say Towantic is to provide the power where the failed CPV plant in Walpole, Massachusetts, being south and west of Boston, would have?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-12
Page 1 of 1

Witness: N/A

Question Larkin-12:

Did you exhaust other possible locations for the plant in Massachusetts or Rhode Island considering that is your targeted customer base?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-13
Page 1 of 1

Witness: N/A

Question Larkin-13:

Did you consider New Hampshire or Vermont?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-14
Page 1 of 1

Witness: N/A

Question Larkin-14:

What is the complete list of towns you considered in Massachusetts and Rhode Island and elsewhere?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-15
Page 1 of 1

Witness: N/A

Question Larkin-15:

What are the multiple reasons, please list them by location, why these locations were not suitable?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-16
Page 1 of 1

Witness: N/A

Question Larkin-16:

Why was your application turned down in Walpole?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Witness: N/A

Question Larkin-17:

What are the differences between attempting to permit a plant in Massachusetts versus permitting a power plant in Connecticut?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Witness: **Andrew J. Bazinet**
 Lynn Gresock
 Fred Sellars

Question Larkin-18:

What about cumulative local impacts? What do you take into account? How about air and noise pollution from I-84? Noise from vehicle engines, truck brakes and from shifting? What about air pollution from all sources and noise from airplanes or helicopters flying overhead, landing, reversing engines, taxi-ing, idling and revving before takeoff? Have you measured all these things together? What else? Did you consider the long double row of transmission lines with inherent EMF added to the other cumulative effects? Did you or I forget anything? Does your plant exceed standards once added to the above? Is it more or less scenic here with a power plant in view?

Response:

The cumulative impacts of the Facility are described in Exhibit 1 to the Petition (Environmental Overview in Support of Petition for Changed Conditions), as well as in numerous interrogatory responses. The air quality and noise impact analyses take into account existing ambient conditions, which reflect the contributions of the sources mentioned above. The Facility has been demonstrated to be fully compliant with all applicable standards. Visibility was among the topics considered in detail in the original Council application. The current Facility configuration has decreased heights of many of the key features approved under the current Certificate and, therefore, visibility is anticipated to be no greater than that previously deemed to be acceptable.

Since there are no changes in the voltage of the transmission lines to which the project will interconnect, there is no increase in electrical field levels. Minor increases in magnetic field levels were previously identified in the Development and Management Plan (D&M Plan) for the certificated Project and will be updated during the D&M Plan phase.

Witness: **Andrew J. Bazinet**
 Lynn Gresock
 Fred Sellars

Question Larkin-19:

What is the impact on the scenic southern part of Middlebury? What is the impact on the Historic brown shingled house with red doors, dating from 1774 with significant Revolutionary War history, overlooking a pond built by my grandfather, farmland and forest land, 80 acres work, donated by my family to the Middlebury Land Trust? What is the impact on the antique barn and house on Wooster Road?

Response:

For the reasons described in multiple CPV responses to interrogatories, and late-filed exhibits and in the transcript, the Facility will not have an adverse environmental effect on any of these properties.

Witness: **Andrew J. Bazinet**
 Lynn Gresock
 Fred Sellars

Question Larkin-20:

What is the plant's impact on the miles and miles of bridle trails on our land linking to the 14 mile Larkin State Bridle Trail?

Response:

For the reasons described in multiple CPV responses to interrogatories, and late-filed exhibits and in the transcript, the Facility will not have an adverse environmental effect on any of these trails. Further, it is our understanding that the property in question is north and east of Long Meadow Pond. Therefore, it would appear that any such trails would be approximately a mile from the Facility. Given this distance, and the Facility's compliance with all applicable environmental standards, no adverse impact to these trails is anticipated.

Witness: **Andrew J. Bazinet**
 Lynn Gresock
 Fred Sellars

Question Larkin-21:

How have you shown me that the above scenic values, historic values and recreational values, which make it desirable to live here, are not negatively impacted by your facility?

Response:

CPV's interrogatory responses, late-filed exhibits, oral testimony and items administratively noticed by the Council demonstrate that the Facility will not have an adverse effect on any of the values described in the question.

Witness: N/A

Question Larkin-22:

If it's a fact that the measurement of impact is lower prices in the area of the plant, particularly in those areas with a view of the plant, how have you shown there wouldn't be a negative impact on these and other features?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Witness: Andrew J. Bazinet

Question Larkin-23:

Is Heritage Water Co. limiting your use of its water? In a matter of years, will there be enough drinking water for existing or new residences with your plant in operation, particularly when oil is burned?

Response:

The water usage by the Facility will not impair the quantity of water needed for existing or future homes or businesses. As explained in CPV's Response to Q-CSC-30, dated January 26, 2015 (Set 2) and on pages 400-401 of the February 10, 2015 transcript, Heritage Village Water Company ("HVWC") is a regulated, franchised, water company and public service company under Connecticut law. As a result, as demonstrated by PURA decisions, and the regulations of PURA and the Department of Public Health Regulations (listed on CPV's Administrative Notice List), HVWC has a legal duty to provide adequate and reliable service to all water customers within the exclusive franchised area granted to it by the Connecticut General Assembly. Therefore, to the extent that HVWC is unable to serve its existing or new customers from its current supply sources, it will need to obtain new sources of water to meet its legal obligations.

Notably, HVWC's latest Water Supply Plan states that "the Towantic Energy Plant in Oxford is being accounted for in the 20-year planning period. The amount that has been allocated for the energy plant is 60,000 gpd." (Section 10-4). Sections 3.1, 4.1, 10.1, and 14.1 of this plan describes some of HVWC's options for procuring the additional water supply it will need in the future to meet its statutory and regulatory obligations as a franchised water company and public service company.

Lastly, CPV Towantic has submitted a service request for an average daily use of 66,900 gallons per day and HVWC has agreed to provide such volumes.

Witness: Andrew J. Bazinet

Question Larkin-24

Let's say there's a lot of residential development 10 or more years from now. Given what you, and all of us now know, about your primary water source, won't drinking water be hard to get for both your plant and the real estate developer? Would development be restricted because of the consumption of your plant? Would a moratorium on new housing, on anything in need of drinking water, be possible?

Response:

See Response to Q-Larkin-23, dated February 24, 2015.

Witness: **Andrew J. Bazinet**

Question Larkin-25:

Where will you get the 1 million gallons of drinking water you need to run on oil?

Response:

A daily maximum of 218,000 gallons of water per day will be supplied to the Project by the Heritage Village Water Company, with the understanding that additional water may be supplied when available. The balance of the water required for ULSD-fueled operation will be supplied by on-site storage.

Witness: **Andrew J. Bazinet**

Question Larkin-26:

Is the lack of water the biggest hurdle in achieving a permit here?

Response:

No. The Heritage Village Water Company has committed to supply the Project with sufficient water to meet its daily requirements. The availability of water is therefore not a "hurdle" in the permitting of the Project.

Witness: Andrew J. Bazinet

Question Larkin-27

Will you be able to locate enough tankers to transport drinking water and oil to the site in Oxford reliably? Is there such a thing as an available tanker truck in times of gas curtailment? Do others compete for tankers to transport oil during a gas curtailment?

Response:

The Facility will not transport any drinking water to the site, except perhaps, drinking water for the administrative building water cooler. The Facility will store 1.5 million gallons of ULSD on-site and that volume will be used during periods of ULSD operation. ULSD oil-deliveries will be scheduled to occur as soon as practicable after the commencement of ULSD operation in order to replace utilized storage inventory. While it's true that other electric generating facilities use fuel oil for operation, the Facility is unlikely to compete for the same supply for the following reasons:

- a. Due to the Facility's unparalleled level of efficiency, it will dispatch before and far more frequently than other electric generating facilities which use fuel oil for operation.
- b. The majority of facilities which have fuel oil operation capability in Connecticut are 50+ year old facilities that were designed to run on fuel oil and as such, have significantly more storage capacity.

**Witness: Andrew J. Bazinet
Jon Donovan**

Question Larkin-28:

How costly would these caravans of oil and water be, traipsing to New Haven and back for oil. And the water would be from where? Do these tankers have an impact on Oxford's narrow rural country roads? What about safety and possible spills on snowy, icy, hilly, narrow country roads? Why not shutdown the plant instead?

Response:

With respect to the question of cost, CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Without waiving its objection, CPV responds as follows:

CPV will not transport water.

Deliveries to the project will be clustered but less frequent than residential oil deliveries. Therefore, impacts to roads and safety will not be of any more of a concern than the current uses.

The Project, as a resource that has cleared in ISO-NE's Forward Capacity Market and now counted on by Connecticut and the entire region for reliability, is obligated to bid into the wholesale market to sell its power on a daily basis. In doing so, the dispatch decision is made by ISO-NE considering a number of different factors but is primarily driven by marginal cost. Due to the Project's high efficiency it will often be chosen as a primary supplier to the region and is obligated to provide its energy.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-29
Page 1 of 1

Witness: **Andrew J. Bazinet**

Question Larkin-29:

How many gallons of drinking water a day does a 3-4 bedroom home use?

Response:

Please see Response to Q-CSC-17, dated February 11, 2015 (Set 3).

Witness: **Andrew J. Bazinet**

Question Larkin-30:

If your answer is 300-400 gallons a day, how many homes worth of water would the power plant consume? Would your answer be 3,333± homes while running on oil? And 612± homes while running on gas?

Response:

Please see Response to Q-CSC-17, dated February 11, 2015 (Set 3).

Witness: Andrew J. Bazinet

Question Larkin-31:

How many future homes are you possibly preventing from being built? Very possibly the 612 homes, possible on our land, when burning gas and 3,333 homes while burning oil, right?

Response:

Please see Responses to Q-CSC-17, dated February 1, 2015 (Set 3) and Q-Larkin-23, dated February 24, 2015.

Witness: **Andrew J. Bazinet**

Question Larkin-32:

So, what is the economic impact if there's a water shortage or lack of water?

Response:

See Response to Q-Larkin-23, dated February 24, 2015.

Witness: **Andrew J. Bazinet**

Question Larkin-33:

Could those 612 homes, needing 218,000 gallons of drinking water a day, be built on our property 5 years from now, then years from now, if the 218,000 gallons of water necessary was already allotted to your power plant?

Response:

See CPV's Response to Q-Larkin-23, dated February 24, 2015.

Witness: N/A

Question Larkin-34:

Does your plan limit the return my family would ordinarily achieve from real estate? From rentals? From house lots or from home sales? Particularly, if the property has a power plant view?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Witness: **Andrew J. Bazinet**
 Lynn Gresock

Question Larkin-35:

Does running on oil, which would deprive over 3,000 homes of water, make sense if the aquifer is already stressed?

Response:

See Response to Q-Larkin-23, dated February 24, 2015. The ULSD-fueled operation of the Facility will not deprive 3,000 homes of water. During the winter heating months of November – March, Heritage Village Water Company supplies its customers with less than 1 million gallons of water per day on average, per its most recently-filed water supply plan (see Bulk Attachment to Q-CSC-14, dated 12/12/2014, Set 1). The 1 million gallons per day supplied to the rest of HVWC's customers, combined with the maximum of 218,000 gallons per day supplied to the Facility, would not exceed HVWC's maximum daily withdrawal limitation of 2.05 million gallons per day.

Witness: **Andrew J. Bazinet**

Question Larkin-36:

Do you consider peoples' use and access to plentiful, yet finite, drinking water more important than feeding that same drinking water to a (massive, pollution spewing, airport hazard and view spoiling) power plant that is not even needed? What is the local benefit?

Response:

See Responses to Q-Larkin-3, 5 and 23, dated February 24, 2015.

Witness: Andrew J. Bazinet

Question Larkin-37

Would the Town of Middlebury suffer economic loss from lack of new real estate taxes if drinking water was hard to come by?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Without waiving this objection, please the Response to Q-Larkin-23, dated February 24, 2015.

Witness: **Andrew J. Bazinet**

Question Larkin-38:

Would the demographics of this town change? Considering there is no safe level of PM 2.5, do those who care about environmental quality move out of town while those who don't care about environmental quality move in?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Without waiving this objection, as to the PM2.5 level, please see the Response to Q-Westover-1 through 3, dated January 27, 2015.

Witness: Andrew J. Bazinet

Question Larkin-39:

What is the economic loss of property in close proximity to the plant site and to 5 specific properties as cited by Nocera, Dillon & Diorio, LLC, prepared on September 29, 2000?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Witness: **Andrew J. Bazinet**

Question Larkin-40:

Because a double row of 125 kv transmission lines pass approximately 2-3 miles through our property to the site, will the EMF increase because of additional power from the plant in the lines?

Response:

Please see Response to Q-Larkin-18, dated February 24, 2015.

Witness: Andrew J. Bazinet

Question Larkin-41:

Do you think EMF decreases the residential and recreational value of land in proximity to EMF producing power lines?

Response:

As to the residential value of land, CPV Towantic objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Without waiving this objection, CPV Towantic responds to the question regarding the recreational value of land, as follows: No.

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Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-42
Page 1 of 1

Witness: **Andrew J. Bazinet**

Question Larkin-42:

Last year, CL&P upgraded one set of what they call lattice towers to monopoles; was this done on your behalf?

Response:

No.

Witness: Andrew. J. Bazinet

Question Larkin-43

What adjustments does CPV have to request of CL&P to interconnect to the transmission lines?

Response:

Certain work will be required on various transmission circuits, two of which traverse the northwest corner of the project site. Most information related to transmission facilities is treated as Critical Energy Infrastructure Information (CEII) and, as such, is subject to certain non-disclosure conditions. Agreements associated with such work have been filed with the Federal Energy Regulatory Commission (FERC).

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-44
Page 1 of 1

Witness: Andrew J. Bazinet

Question Larkin-44:

Is CPV entertaining the idea of a third (or fourth turbine?) Would the lines have to be upgraded and would the EMF increase?

Response:

No.

Witness: N/A

Question Larkin-45:

What are your intentions (the Siting Council and the populace need to know now)?

Response:

Not applicable. See Response to Q-Larkin-44, dated February 24, 2015.

Witness: N/A

Question Larkin-46:

What will have to be done to accommodate a possible 3rd or 4th turbine?

Response:

Not applicable. See Response to Q-Larkin-44, dated February 24, 2015.

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Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-47
Page 1 of 1

Witness: **Andrew J. Bazinet**
 Lynn Gresock

Question Larkin-47:

Are additional turbines easy to permit?

Response:

No.

Witness: **Andrew J. Bazinet**

Question Larkin-48:

What are the scientifically proven levels of EMF that are a health concern? What scientific study supports your answer?

Response:

Please see the numerous documents discussing EMF on the Council's Administrative Notice List.

Witness: name

Question Larkin-49:

What are the health effects of EMF? What is a safe distance for a home or a human to be from power lines to prevent health problems? Can EMF kill humans?

Response:

Please see Response to Q-Larkin-48, dated February 24, 2015.

CPV Towantic, LLC
Docket No. 192B

Interrogatories Larkin-1
Dated: 2/24/2015
Q-Larkin-50
Page 1 of 1

Witness: N/A

Question Larkin-50:

Who is financing this plant? A bank? Private investors? Citizens of Connecticut? Citizens of Massachusetts? Citizens of Rhode Island?

Response:

CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

Witness: Andrew J. Bazinet

Question Larkin-51:

Does the company compensate for the loss of economic value in peoples' homes and property? Does the company reimburse people for health problems resulting from living in proximity to a power plant?

Response:

As to compensation for the loss of economic value in people's homes and property, CPV objects to this interrogatory. It seeks information on matters that are not relevant, not at issue in this docket and not within the scope of the Council's statutory authority under the Act or within the scope of a Conn. Gen. Stat. § 4-181a(b) proceeding.

As to reimbursement for claims of health problems, see Response to Q-Westover-4, dated January 27, 2015.

Witness: Andrew J. Bazinet

Question Larkin-52:

Can CPV be as considerate as CL&P after they installed monopoles through our property, and restored the construction road to as close to its previous condition as possible to enable the continuation of safe horseback riding on its right of way?

Response:

CPV will only be performing construction activities on private property that is not available for any public use, including horseback riding. As part of CPV Towantic's standard orientation procedure, visitors, employees and contractors will be informed of the presence of areas commonly used for horseback riding within the vicinity of the Project and will receive training to ensure that horseback rider safety will not be impaired.

Witness: **Curtis Jones**
 Dean Gustafson

Question Larkin-53:

Will the new access road you plan to build to the plant site impact wetlands? Will you be conducting a study in the spring to reveal the wetlands' crucial secrets?

Response:

The new access road on the Project crosses portions of Wetlands #1 and 4. A wetlands delineation has already been performed and additional study will be conducted in the spring. See Responses to Q-CSC-6 and 20, dated 1/26/2015 (Set 2).

Witness: **Andrew J. Bazinet**

Question Larkin-54:

Do you have a copy of, or have you seen a copy of, Michael Klemens' testimony regarding Woodruff Hill and the proposed road? If so, would you please share it?

Response:

CPV does not have and has not seen a copy of the requested document.