

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Petition of Plainfield Renewable Energy LLC for a ) Petition 784MR  
Declaratory Ruling that No Certificate of Environmental )  
Compatibility and Public Need Is Required for the )  
Construction, Maintenance, and Operation of a 37.5 MW )  
Wood Biomass Staged Gasification Generating Project )  
in Plainfield, Connecticut ) August 8, 2008

**MOTION TO COMPEL**

Plainfield Renewable Energy, LLC (“PRE”) respectfully requests the Connecticut Siting Council (the “Council”) issue an order compelling the Friends of the Quinebaug River (“FOQR”) to fully comply with the Council’s July 16, 2008 Pre-Hearing Memorandum by disclosing their witnesses no later than August 11, 2008.

The Council’s Pre-Hearing Memorandum required all parties, intervenors, and other participants to exchange witness lists before August 7, 2008. See Pre-Hearing Memorandum, Paragraph 2. FOQR’s August 7, 2008 filing failed to provide a list of witnesses that will be made available for cross examination by the Council, its staff, parties and intervenors. Further, the FOQR did not respond to PRE’s counsel’s follow-up request for a witness list made after FOQR filed its deficient compliance. Regrettably therefore, PRE must ask for the Council’s assistance to compel compliance.

The FOQR's failure to identify witnesses as the Council's Pre-hearing Memorandum required prejudices PRE's ability to adequately prepare for the August 14 hearing. PRE requests that the Council order FOQR to immediately identify individuals who will testify on their behalf at the upcoming hearing and provide a summary of the possible topics of each witnesses testimony.

Respectfully Submitted

PLAINFIELD RENEWABLE ENERGY, LLC

By: 

Bruce L. McDermott

Robert Klee

Wiggin and Dana, LLP

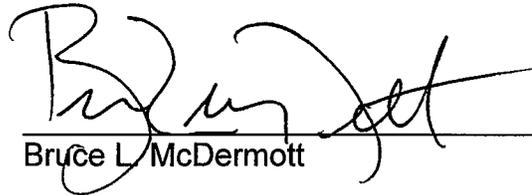
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## CERTIFICATION

This is to certify that on this 8<sup>th</sup> day of August, 2008, an original and twelve (12) copies of the foregoing were delivered by hand to The Connecticut Siting Council, 10 Franklin Square, New Britain, Connecticut 06051, one copy was served on all other known parties and intervenors by depositing the same in the United States mail, first class postage prepaid on this 8<sup>th</sup> day of August, 2008, and an electronic copy was provided to the Connecticut Siting Council and all other known parties and intervenors.



Bruce L. McDermott

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