

STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: [siting.council@ct.gov](mailto:siting.council@ct.gov)

[www.ct.gov/csc](http://www.ct.gov/csc)

November 9, 2009

Andrew Lord, Esq.  
Murtha Cullina LLP  
City Place I, 29<sup>th</sup> Floor  
185 Asylum Street  
Hartford, CT 06103

RE: **PETITION NO. 907** – Montville Power LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the retrofit and operation of a 40 MW Biomass-Fueled Generation Unit at the Montville Station in Uncasville, Connecticut.

Dear Attorney Lord:

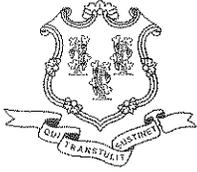
The Connecticut Siting Council (Council) requests your responses to the enclosed questions not later than November 30, 2009. Please forward an original and 15 copies to this office. In accordance with the State Solid Waste Management Plan, the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Yours very truly,



S. Derek Phelps  
Executive Director

c: Council Members



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Petition 907

Montville Power LLC

Interrogatories – Set 2

- 2-1. In MPL's correspondence of October 15, 2009, several items are referenced without any sources listed. Please provide sources for the following:
- item #2 (Fuel Supply and Sustainability) states "MPL has obtained information from fuel suppliers and a fuel study". Please provide the source of the fuel study.
  - item #2 (Fuel Supply and Sustainability) states "These findings are consistent with supply studies conducted by the Connecticut Clean Energy Fund and the Massachusetts Division of Energy Resources". Please provide the sources of these studies.
  - item #2 (Fuel Supply and Sustainability) states "...the Council can be assured that the fuel will be derived in a sustainable manner as required by state regulations to qualify for Class I Renewable Energy Credits (RECs)." Please cite the statutory and regulatory provisions.
- 2-2. The hearing transcript of September 16, 2009, p. 27, MPL states high infrastructure costs would be associated with rail delivery. Were any studies conducted on the feasibility and/or costs associated with such delivery to the power station? If so, please provide. If not, what is the basis for this statement?
- 2-3. The application states that barge delivery is possible from wood fuel sources located in northern states. Were any studies conducted on the feasibility and/or costs associated with such delivery to the power station? If so, please provide. If not, what is the basis for this statement?
- 2-4. Does MPL intend to construct unloading infrastructure associated with barge delivery as part of this project? If so, provide plans. If not, why not.
- 2-5. Please explain the feasibility of delivering fuel by truck to an off-site location for unloading and hogging, then shipping the processed fuel to the plant by barge or rail. Were any studies conducted on the costs of such delivery?
- 2-6. Please explain the feasibility of truck access to the site from Dock Road either along the CL&P right-of-way or along the existing railroad line.
- 2-7. Please explain the feasibility of truck access to the site from Hewitt Drive and the adjacent CL&P right-of-way.
- 2-8. Does MPL intend to obtain fuel from a 100-mile radius? If so, at what truck fuel cost is this radius no longer cost effective? Is there enough wood fuel within a 50-mile radius? If so, at what truck fuel cost is this radius no longer cost effective?
- 2-9. Is it possible that other generator units at the site would be converted to wood fuel in the near term? Please explain.

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Applicant</b>	<input checked="" type="checkbox"/> U.S. Mail	Montville Power LLC	Andrew W. Lord, Esq. Murtha Cullina LLP CityPlace I, 29 <sup>th</sup> Floor 185 Asylum Street Hartford, CT 06103 (860) 240-6180 (860) 240-6150 <a href="mailto:alord@murthalaw.com">alord@murthalaw.com</a>
	<input checked="" type="checkbox"/> U.S. Mail		Julie L. Friedberg, Esq. Senior Counsel NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540 (609) 524-5232 (609) 524-4941
	<input checked="" type="checkbox"/> U.S. Mail		Judith Lagano Director – Asset Management NRG Energy, Inc. c/o Montville Power LLC 74 Lathrop Road Uncasville, CT 06382 (203) 854-3625 (203) 854-3658
	<input checked="" type="checkbox"/> U.S. Mail		Jonathan Baylor Senior Analyst, Development & Asset Management NRG Energy, Inc. 211 Carnegie Center Princeton, NJ 08540 (609) 524-4958 (609) 524-4941
<b>Party (granted on 9/16/09)</b>	<input checked="" type="checkbox"/> U.S. Mail	The Connecticut Light and Power Company	John R. Morissette Manager – Transmission Siting & Permitting Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-6774 <a href="mailto:morisjr@nu.com">morisjr@nu.com</a>

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<p style="text-align: center;"><b>Party (granted on 9/16/09)</b></p>	<input checked="" type="checkbox"/> U.S. Mail	<p>The Connecticut Light and Power Company continued....</p>	<p>Jeffery D. Cochran, Esq. Senior Counsel Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-3548 (860) 665-5504 fax <a href="mailto:cochrjd@nu.com">cochrjd@nu.com</a></p>
	<input checked="" type="checkbox"/> U.S. Mail		<p>Robert S. Golden, Jr., Esq. Carmody &amp; Torrance LLP P.O. Box 1110 50 Leavenworth Street Waterbury, CT 06721-1110 (203) 573-1200 (203) 575-2600 <a href="mailto:rgolden@carmodylaw.com">rgolden@carmodylaw.com</a></p>
	<input checked="" type="checkbox"/> U.S. Mail		<p>Anthony M. Fitzgerald, Esq. Carmody &amp; Torrance LLP P.O. Box 1950 195 Church St., 18<sup>th</sup> Floor New Haven, CT 06509-1950 (203) 777-5501 <a href="mailto:afitzgerald@carmodylaw.com">afitzgerald@carmodylaw.com</a></p>