

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

**Petition of BNE Energy Inc. for a
Declaratory Ruling for the Location, Construction
and Operation of a 3.2 MW Wind Renewable
Generating Project on New Haven Road in
Prospect, Connecticut (“Wind Prospect”)**

Petition 980

March 29, 2011

**PETITIONER’S OBJECTION TO SAVE PROSPECT CORP.’S REQUEST
FOR PERMISSION TO SERVE ADDITIONAL INTERROGATORIES
ON BNE ENERGY INC.**

The petitioner, BNE Energy Inc. (“BNE”), submits this objection to Save Prospect Corp.’s (“Save Prospect”) request for permission to serve additional interrogatories on BNE, dated March 23, 2011. BNE objects to this request as untimely, as all interrogatories were required to be issued by March 1, 2011. Furthermore, the interrogatories are substantively immaterial, as all information exchanged to/from BNE to GE is irrelevant to this proceeding.

The hearing schedule set by the Siting Council clearly states that March 1, 2011 was the deadline for issuing interrogatories. Save Prospect has already issued a total of one hundred and seven (107) interrogatories to BNE. BNE appropriately responded to each and every interrogatory. In fact, BNE has appropriately responded to each and every of the hundreds of interrogatories timely issued by various parties and intervenors, including the parties grouped with Save Prospect, in this proceeding. Save Prospect provides no compelling reason for which the Siting Council should depart from its established hearing schedule to allow additional interrogatories to be issued now – one week before the final hearing in this proceeding. Save Prospect’s request to serve additional interrogatories on BNE a full month after the deadline for doing so must be rejected as untimely.

Furthermore, turning to the substance of the proposed additional interrogatories, the information sought is immaterial. As BNE has stated at the hearings in this proceeding, it has consulted extensively with GE regarding the proposed project, but does not yet have a contract with GE for purchase of turbines. BNE's consultations with GE and information transmitted therein are wholly irrelevant to this proceeding. With regard to the one proposed interrogatory that does not request GE information, proposed Q112, the GPS coordinates for all turbines have already been provided by BNE.

WHEREFORE, as its proposed interrogatories are not only untimely but also substantively immaterial, BNE respectfully requests that the Council deny Save Prospect's request to issue additional interrogatories.

Respectfully Submitted,

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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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