

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

Docket/Petition No. 980

February 16, 2011

**SAVE PROSPECT CORP'S RESPONSE  
TO BNE'S SECOND INTERROGATORIES**

The Party, Save Prospect Corp. ("SPC"), hereby responds to the petitioner, BNE Energy, Inc. ("BNE"), Second Interrogatories as follows:

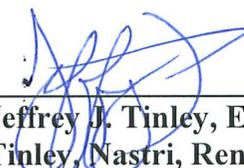
4. On February 3, 2011, Mr. Tim Reilly, President of SPC, testified at the Connecticut State Legislature, Energy and Technology Committee public hearing Concerning Raised House Bill 6249 that SPC is a "group of concerned Prospect residents now numbering more than five hundred people and growing every day." Please list all five hundred plus members of SPC including each member's full name and address.

**RESPONSE: Objection. This interrogatory is vague, confusing and misleading in that the alleged quote from Mr. Reilly only refers to SPC as a "group of concerned Prospect residents" and makes no mention of its "members" or membership of SPC generally. SPC further objects to this interrogatory on the ground that it is overly broad and unduly burdensome. Specifically, BNE requests the names and addresses of more than five hundred Prospect Residents despite having already received the names and addresses of SPC's officers and directors. SPC further objects to this interrogatory on the ground that it is wholly irrelevant and goes beyond reasonable discovery and long-standing practice in Siting Council proceedings. Under the Uniform Administrative Act, a party has the opportunity to review "relevant and material" information not in its possession "except as otherwise provided by federal law or any other provision of the general statutes..." Conn. Gen. Stat. sec. 4-177c(1) (emphasis added). The**

**names and addresses of Prospect residents who have shown their support for SPC is neither an issue before this Council nor reasonably calculated to lead to the discovery of admissible evidence. Finally, SPC objects because it has not been authorized by any persons who have provided personal identifying information to disclose such information.**

**Respectfully submitted,  
SAVE PROSPECT CORP**

**By:**

  
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**Jeffrey J. Tinley, Esq.  
Tinley, Nastri, Renchan & Dost, LLP  
60 North Main Street  
Waterbury, CT 06702  
Tel. (203) 596-9030  
Facsimile: (203) 596-9036  
Email: [jtinley@tnrdlaw.com](mailto:jtinley@tnrdlaw.com)  
Its Attorneys**

## CERTIFICATION

This is to certify that a copy of the foregoing has been sent via first class mail, postage pre-paid, on this 16<sup>th</sup> day of February, 2011 to the following:

Carrie L. Larson, Esq.  
Pullman & Comley, LLC  
90 State House Square  
Hartford, CT 06103-3702  
E-Mail: [clarson@pullcom.com](mailto:clarson@pullcom.com)  
*On behalf of Applicant BNE Energy, Inc.*

Paul Corey, Chairman  
BNE Energy, Inc.  
Town Center, Suite 200  
29 South Main Street  
West Hartford, CT 06107  
E-Mail: [pcorey@bneenergy.com](mailto:pcorey@bneenergy.com)  
*On behalf of Applicant BNE Energy, Inc.*

The Honorable Robert J. Chatfield, Mayor  
Town Office Building  
36 Center Street  
Prospect, CT 06712-1699  
E-Mail: [Town.of.prspect@sbcglobal.net](mailto:Town.of.prspect@sbcglobal.net)  
*On behalf of Party Town of Prospect*

Thomas J. Donahue, Jr., Esq.  
Killian & Donahue, LLC  
363 Main Street  
Hartford, CT 06106  
E-Mail: [tj@kdjlaw.com](mailto:tj@kdjlaw.com)  
*On behalf of Parties John Lamontagne, Cheryl Lamontagne, Thomas Satkunas and Eileen Satkunas*

Nicholas J. Harding, Esq.  
Emily A. Gianquinto, Esq.  
Reid and Reige, P.C.  
One Financial Plaza, 21<sup>st</sup> Floor  
Hartford, CT 06103  
*On behalf of Party FairwindCT, Inc.*

Robert S. Golden, Esq.  
Carmody & Torrance, LLP  
50 Leavenworth Street  
Waterbury, CT 06721-1110  
*On behalf of Party Town of Prospect, as Town Attorney*

Rosa L. DeLauro, State Representative  
59 Elm Street, Second Floor  
New Haven, CT 06510  
*On behalf of Limited Appearance*

John R. Morissette  
Manager - Transmission Siting and Permitting  
Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270  
E-Mail: [morisjr@nu.com](mailto:morisjr@nu.com)  
*On behalf of Intervenor CL & P*

Christopher R. Bernard  
Manager - Regulatory Policy (Transmission)  
The Connecticut Light and Power Company  
P.O. Box 270  
Hartford, CT 06141-0270  
E-Mail: [bernacr@nu.com](mailto:bernacr@nu.com)  
*On behalf of Intervenor CL & P*

Joaquina Borges King, Esq.  
Senior Counsel  
Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270  
E-Mail: [borgej@nu.com](mailto:borgej@nu.com)  
*On behalf of Intervenor CL & P*

  
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Jeffrey J. Tinley