

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

**GRE GACRUX LLC petition for a declaratory ruling for the proposed construction, maintenance and operation of a 16.78-megawatt AC solar photovoltaic electric generating facility in Waterford, Connecticut. Reopening of this petition based on changed conditions.**

**Petition No. 1347A**

**June 24, 2020**

**DECLARATION OF DEBORAH MOSHIER-DUNN**

I, Deborah Moshier-Dunn, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the Vice President of Save the River-Save the Hills, Inc. ("STR-STH").
2. I am over the age of 18, and I understand the obligation of an oath.
3. I submit this declaration in support of STR-STH's objection to the motion to compel filed by petitioner GRE GACRUX LLC ("GRE").
4. In an interrogatory response submitted to the Council in October 2018 in connection with the underlying proceeding (Petition 1347), I wrote that STR-STH had about 350 members.
5. When I refer to STR-STH's "members," I mean donors, including organizations that contribute money or other resources and partner with STR-STH in its various programs. Members do not receive any benefit outside of our gratitude and a copy of our free newsletter that is posted online for the general public. STR-STH uses the terms "members" and "donors" interchangeably. Our fiscal year runs January to December. We consider a "member" to be someone who donates within our fiscal year.
6. At the time of my statement to the Council in response to that interrogatory, it was true that STR-STH, in the fiscal year 2018, had approximately 350 donors, including both individuals and organizations.

7. Unfortunately, 2020 is not tracking in the same direction, and STR-STH has received only a small fraction of the donations it received in 2018.

8. I attribute the significant difference to the fact that STR-STH's board decided to forego our usual USPS mailing of our winter and spring newsletters, which solicits "membership donations," due to the COVID-19 pandemic. Our donations are largely dependent on our hardcopy newsletters, which we aim to send out quarterly.

9. In addition, the COVID-19 pandemic has had an adverse effect on the activities that normally keep STR-STH visible in the community, including delays in implementing our pumpout program and our inability to hold annual spring events, which are part of our usual spring fundraising appeal/membership drive. We have also now cancelled our biggest "membership drive" of the year - our annual Kayak Regatta on Niantic River Appreciation Day, a day STR-STH created by getting the towns of Waterford and East Lyme to sign a Proclamation to name the day.

10. I understand that many nonprofits are seeing a decline in contributions in this time of uncertainty.

11. People who like STR-STH's Facebook page are not members and unfortunately based on the numbers, are not all donors, as we have many more followers (more than 700) than we have donors.

12. People who sign up to receive our free newsletter are not "members" and are not all donors. And certainly not all the people who visit our public website are donors.

13. I, as chair of the STR-STH SmartSolar committee, wrote the STR-STH Facebook posts and website announcements about the public hearing that were referenced in GRE's motion to compel, and I purposely left out any direction to those who would read it on what they should say should they decide to speak at the hearing, and instead directed anyone

reading the post to the Council's website with all of the information about this project. Indeed, I have had conversations with fellow townspeople who were interested in my posts or website announcements who are very pro-solar. I do not know what people will say at the public comment session, nor do I even know who has signed up to speak.

14. Finally, I would like to note again that STR-STH is not against solar power; it is against any development that would have adverse impacts on the watershed of the Niantic River. STR-STH believes that the uniqueness of this particular project site warrants *considerably more* stormwater protections than GRE has proposed in order to ensure there are no adverse impacts from this project affecting the surrounding wetlands and streams. That is why STR-STH is so invested in being involved with this process, regardless of the costs in time and money.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 24th day of June, 2020.

  
\_\_\_\_\_  
Deborah Moshier-Dunn

CERTIFICATION

I hereby certify that a copy of the foregoing document was delivered by first-class mail and e-mail to the following service list:

Lee Hoffman  
Pullman & Comley LLC  
90 State House Square  
Hartford, CT 06103-3702  
lhoffman@pullcom.com

Jean-Paul La Marche  
Development Manager  
Clean Focus Renewables, Inc.  
jean-paul.lamarche@cleanfocus.us

Deborah Moshier-Dunn  
VP, Save the River-Save the Hills, Inc.  
P.O. Box 505  
Waterford, CT 06385  
debm0727@sbcglobal.net

The Honorable Robert J. Brule  
First Selectman  
Waterford Town Hall  
15 Rope Ferry Road  
Waterford, CT 06385  
rbrule@waterfordct.org  
apiersall@waterfordct.org

Robert A. Avena  
Suisman Shapiro  
20 South Anguilla Road  
P.O. Box 1445  
Pawcatuck, CT 06379  
ravena@sswbagg.com

/s/ Emily A. Gianquinto  
Emily Gianquinto