

STATE OF CONNECTICUT

Greenskies Clean Energy, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 3.0-megawatt-AC solar photovoltaic electric generating facility on two parcels at the Elmridge Golf Course located to the east and west of North Anguilla Road at the intersection with Elmridge Road, Stonington, Connecticut, and associated electrical interconnection.

Petition No. 1410

September 17, 2020

Greenskies Clean Energy, LLC’s Interrogatories to Mr. Douglas Hanson

Please respond to the foregoing interrogatories no later than September 24, 2020, pursuant to the Connecticut Siting Council’s Revised Schedule of August 27, 2020.

Several of these interrogatories refer to that certain Party Status Request Form that was submitted on behalf of Mr. Hanson to the Connecticut Siting Council on July 2, 2020. For purposes of these interrogatories, that correspondence shall be referenced to as the “Party Request Form.”

1. What land uses does Mr. Hanson believe are appropriate and/or suitable for the proposed Project Site?
2. Of the following land uses, which (if any) does Mr. Hanson believe to be appropriate and/or suitable for the proposed East Project Area:¹
 - a. Public utility substations;

¹ For purposes of these Interrogatories, the term “East Project Area” shall be defined as that certain parcel bounded to the north by Elm Ridge Road, within a lot containing nine (9) holes of the golf course, a driving range, club house, small maintenance building, and a residence (Stonington Assessment Department Parcel ID 22-2-1), and the term “West Project Area” shall be defined as that certain parcel bounded by residential lots to the north, N. Anguilla Rd. to the east, open space and a residential lot to the south and Interstate I-95 to the west (Stonington Assessment Department Parcel ID 39-1-9).

- b. Agriculture and the keeping and breeding of livestock (with a 200' setback for manure storage and stables);
 - c. Duplex housing;
 - d. Public utility structures and facilities;
 - e. Communication and water towers;
 - f. Municipal facilities;
 - g. Public and private elementary and secondary schools;
 - h. Trailer parks and trailer camps (with 50 feet of buffer and 30 feet of screening);
 - i. Lumbering and mills;
 - j. Excavation operations;
 - k. Cemeteries;
 - l. Crematoriums and funeral homes
 - m. Congregate living facilities;
 - n. Hospitals; and/or
 - o. Convalescent homes
3. Does Mr. Hanson believe that a maximum height of 30 feet for a structure is fair and reasonable for structures to be placed on the proposed East Project Area?
4. Of the following land uses, which (if any) would Mr. Hanson consider to be appropriate and/or suitable for the proposed West Project Area:
 - a. Agriculture and the keeping and breeding of livestock (with a 200' setback for manure storage and stables);
 - b. Public utility structures and facilities;
 - c. communication and water towers;
 - d. Kennels;
 - e. Lumbering and lumber mills;
 - f. municipal facilities; and/or
 - g. public or private elementary and secondary schools.
5. Does Mr. Hanson believe that a maximum height of 30 feet for a structure is fair and reasonable for structures to be placed on the proposed West Project Area?
6. Referring to page 1 of the Party Request Form, has Mr. Hanson conducted an independent noise study and modeling analysis for the proposed Project? If so, please provide the results of any such study and/or modeling analysis.
7. What appraisals does Mr. Hanson possess that supports his assertion that the proposed Project will have a "deleterious effect" on the value of his property? See Party Request Form, p. 2. Please provide such appraisals.

8. Has Mr. Hanson reviewed the Petitioner's proposed operation/maintenance ("O&M") plans for the Project? *See Party Request Form, p. 1.*
9. Are the proposed O&M activities for the Project (including frequency thereof) more or less disruptive than that which is generally required for the maintenance and operation of a golf course?
10. Does Mr. Hanson believe that the Project Site's golf course operations (and associated maintenance) interferes with his right to quiet enjoyment? Please explain why or why not.
11. Has Mr. Hanson ever personally visited a site that contains a commercial solar facility? If so, please identify the site/solar facility.
12. If the answer to Interrogatory No. 12 above is "Yes", did Mr. Hanson observe anything about the noise emitting therefrom? Please detail said observations.

Respectfully submitted,
Greenskies Clean Energy, LLC



By: _____

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CERTIFICATION

I hereby certify that on this 17th day of September, 2020, the foregoing was delivered by electronic mail, in accordance with § 16-50j-12 of the Regulations of Connecticut State Agencies, to the following parties and intervenors of record:

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