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September 30, 2020

VIA ELECTRONIC MAIL

Melanie Bachman
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition 1410 - Greenskies Clean Energy, LLC petition for a declaratory ruling 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

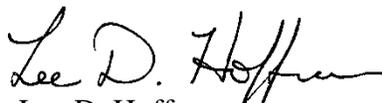
Dear Ms. Bachman:

I am writing on behalf of my client, Greenskies Clean Energy, LLC (“Greenskies”), in connection with the above-referenced Petition. With this letter, I am enclosing Greenskies’ Motion to Strike the Supplemental Pre-Filed Testimony of Steven D. Trinkaus that Proponents for Responsible Emplacement of Stonington Solar (“PRESS”) submitted to the Council yesterday.

Additionally, in anticipation of the public hearing that is scheduled for tomorrow, Greenskies also respectfully requests that the Council take administrative notice of Connecticut Siting Council Petition No. 1398, *LSE Pictor, 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 1.99-megawatt AC solar photovoltaic electric generating facility on an approximately 104 acre parcel located off of Platt Hill Road, Winchester, Connecticut and associated electrical interconnection*. That Petition is mentioned in Mr. Trinkaus’s September 24, 2020 testimony, and is a public record.

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been made to all parties on the Petition’s Service List as of this date.

Sincerely,


Lee D. Hoffman

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

Greenskies Clean Energy, LLC petition for a declaratory ruling 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 30, 2020

**GREENSKIES' MOTION TO
STRIKE SUPPLEMENTAL PRE-FILED TESTIMONY OF STEVEN D. TRINKAUS**

Petitioner Greenskies Clean Energy, LLC (“Greenskies”) hereby moves to strike the supplemental pre-filed testimony of Steven D. Trinkaus (the “Supplemental PFT”) that Proponents for Responsible Emplacement of Stonington Solar (“PRESS”) inappropriately submitted to the Council on September 29, 2020, in direct contravention of the scheduling order and pre-filing requirements set forth in this Proceeding. For this reason, Mr. Trinkaus’ supplemental pre-filed testimony should be struck from the record.

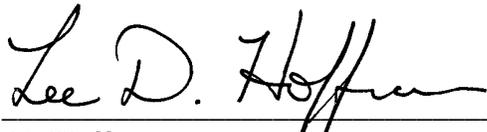
PRESS’s submission is untimely. The deadline for pre-filed testimony was on September 24, 2020. *See* Revised Schedule for Petition No. 1410, dated August 27, 2020. PRESS has failed to offer an adequate explanation as to why the Supplemental PFT, submitted at the eleventh hour, should be admitted into the evidentiary record for this Proceeding. The only proffered justification is that Mr. Trinkaus felt it necessary to submit calculations for the instant Petition, after having been criticized for his failure to do so in connection with another, unrelated project of Greenskies (Petition No. 1347A). *See* Pre-Filed Testimony of Steven D. Trinkaus, dated September 24, 2020 (“Supplemental PFT”), p. 1.

This logic, however, is inherently flawed. Mr. Trinkaus was subject to cross-examination during the referenced Petition No. 1347A proceeding, and he was specifically asked for these same exact calculations in that petition. This occurred over a month ago. Mr. Trinkaus therefore had ample notice—and correspondingly, opportunity—to prepare these calculations and submit same for the Council’s and Parties’ review well before the September 24, 2020 deadline.

Moreover, Mr. Trinkaus’s own testimony contradicts the need for such calculations. Considering that Mr. Trinkaus himself conceded that he does not see these “calculations as necessary to support [his] testimony” (*see* Supplemental PFT, p. 1), Greenskies does not see any justification in allowing the Supplemental PFT into the record, especially in light of the fact that it was submitted well after the deadline.

For these reasons, Greenskies moves to strike the supplemental pre-filed testimony of Steven D. Trinkaus.

Respectfully submitted,
Greenskies Clean Energy, LLC

By: 

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CERTIFICATION

I hereby certify that on this 30th 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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