

JONATHAN H. SCHAEFER

280 Trumbull Street
Hartford, CT 06103-3597
Main (860) 275-8200
Fax (860) 275-8299
jschaefer@rc.com
Direct (860) 275-8349

Also admitted in Massachusetts
and Vermont

Via Electronic Mail (siting.council@ct.gov)

June 1, 2021

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

Re: **PETITION NO. 1443 - SR North Stonington, 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 9.9-megawatt AC solar photovoltaic electric generating facility on five parcels located north and south of Providence New London Turnpike (State Route 184), west of Boombridge Road and north of Interstate 95 in North Stonington, Connecticut, and associated electrical interconnection**

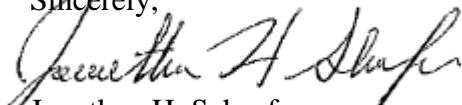
Dear Attorney Bachman:

SR North Stonington, LLC hereby submits its pre-hearing submission to the Connecticut Siting Council's (Council) in connection with the above-referenced Petition.

I hereby certify that on this date a copy of this filing was sent via electronic mail to Robert Avena, Esq. (ravena@sswbgg.com) and Juliet Hodge (jhodge@northstoningtonct.gov).

If you have any questions concerning this submittal, please contact me at your convenience.

Sincerely,



Jonathan H. Schaefer

Enclosures (Pre-Hearing Submission; Sign Posting Affidavit; Resumes of Witnesses; electronic copy of Attachment 1 – revised Preliminary Site Layout Plan (Petition, Exhibit A (rev. 5.14.21))

22408002-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :

SR NORTH STONINGTON, LLC PETITION : PETITION NO. 1443
FOR A DECLARATORY RULING, :
PURSUANT TO CONNECTICUT GENERAL :
STATUTES §4-176 AND §16-50K, FOR THE :
PROPOSED CONSTRUCTION, :
MAINTENANCE AND OPERATION OF A :
9.9-MEGAWATT AC SOLAR :
PHOTOVOLTAIC ELECTRIC GENERATING :
FACILITY ON FIVE PARCELS LOCATED :
NORTH AND SOUTH OF PROVIDENCE :
NEW LONDON TURNPIKE (STATE ROUTE :
184), WEST OF BOOMBRIDGE ROAD AND :
NORTH OF INTERSTATE 95 IN NORTH :
STONINGTON, CONNECTICUT, AND :
ASSOCIATED ELECTRICAL :
INTERCONNECTION : JUNE 1, 2021

PRE-HEARING SUBMISSION OF
SR NORTH STONINGTON, LLC

SR North Stonington, LLC (“Petitioner”) hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the above-referenced Petition.

A. List of Witnesses

1. Peter Candelaria, P.E., Chief Development Officer – Silicon Ranch
2. Ali Weaver, Director, Project Development – Silicon Ranch
3. Dean Gustafson, Manager, Natural Resources – All-Points Technology Corp. P.C.
4. Dennis Quinn, Owner – Quinn Ecological, LLC
5. Matt Brawley, Senior Civil Engineer – HDR

6. Vincent Ginter, Acoustic Engineer, P. Eng., M. Sc. – Urban Solution Group

B. Exhibits to be offered

Petitioner intends to offer the following Exhibits:

1. Petition for Declaratory Ruling with the Siting Council for the proposed construction, maintenance and operation of a 9.9 MW(ac) ground-mounted solar photovoltaic power generation system located in North Stonington, Connecticut filed by SR North Stonington, LLC dated February 25, 2021 with the following exhibits:
 - a. Preliminary Site Layout Plan
 - b. Aquifer Protection and Groundwater Quality Maps
 - c. Farmland Soils Map
 - d. Decommissioning Plan
 - e. Abutting Property Owner's Post Card Mailer
 - f. Core Forest Maps
 - g. Abutters Notice of Intent, Certificate of Service, and Certificates of Mailing
 - h. Officials Notice of Intent, Certificate of Service, and Certificates of Mailing
 - i. Map of Abutting Property Owners
 - j. Phase I Environmental Site Assessment
 - k. Envirotemp FR3 Fluid SDS
 - l. Tree Analysis
 - m. Integrated Vegetation Management Plan
 - n. Noise Impact Assessment
 - o. FAA Notice Criteria Tool

- p. Archaeological Sensitivity Assessment
 - q. June 11, 2019 Correspondence to SHPO
 - r. SHPO Concurrence Letter (July 2019)
 - s. Phase I Reconnaissance Archeological Survey (RAS)
 - t. Submittal of Phase I RAS to SHPO
 - u. Wetlands and Habitat Report Part I Part II Part III
 - v. Stormwater Pollution Control Plan
 - w. Request for NDDB State Listed Species Review (2020)
 - x. SHPO Concurrence Letter (Dec. 2020)
 - y. Quantitative and Qualitative Visual Impacts
 - z. Preliminary Drainage Report
2. Petitioner's Responses to Pre-Hearing Interrogatories (Set 1) from the Council dated May 10, 2021, including Attachments 1 through 18.
 3. Sign Posting Affidavit dated May 26, 2021 (copy attached).
 4. Resume of Peter Candelaria, P.E., Chief Development Officer – Silicon Ranch (copy attached).
 5. Resume of Ali Weaver, Director, Project Development – Silicon Ranch (copy attached).
 6. Resume of Dean Gustafson, Manager, Natural Resources – All-Points Technology Corp. P.C. (copy attached).
 7. Resume of Dennis Quinn, Owner – Quinn Ecological, LLC (copy attached).
 8. Resume of Matt Brawley, Senior Civil Engineer – HDR (copy attached).
 9. Resume of Vincent Ginter, Acoustic Engineer, P. Eng., M. Sc. – Urban Solution Group (copy attached).

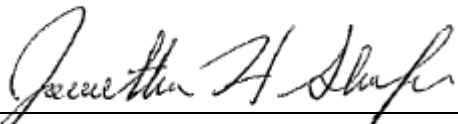
C. Remote Public Comment Section

Prior to the start of the Remote Public Comment Section, Ali Weaver with Silicon Ranch will make a brief presentation describing the site features and proposed site improvements. Ms. Weaver will refer to Attachment 1 – revised Preliminary Site Layout Plan (Petition, Exhibit A (rev. 5.14.21)) – to the Petitioner’s responses to the Pre-Hearing Interrogatories (Set 1) from the Council dated May 10, 2021. An electronic copy of Attachment 1 is attached to this filing as a separate PDF file for the Council’s convenience.

Petitioner reserves the right to offer additional exhibits, testimony, witnesses, and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties, or intervenors.

Respectfully submitted,

SR NORTH STONINGTON

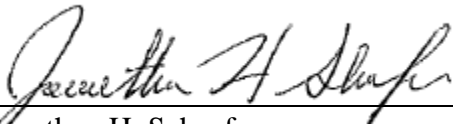
By: 
Kenneth C. Baldwin, Esq.
Jonathan H. Schaefer, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of June 2021, a copy of the foregoing was sent, via electronic mail, to:

Robert A. Avena
North Stonington Town Attorney
Suisman Shapiro
20 South Anguilla Road
P.O. Box 1445
Pawcatuck, CT 06379
ravena@sswbgg.com

Juliet Hodge
Planning, Development & Zoning Official
Town of North Stonington
40 Main Street
North Stonington, CT 06359
jhodge@northstoningtonct.gov



Jonathan H. Schaefer