



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@po.state.ct.us

Web Site: www.ct.gov/csc

INTERVENOR STATUS REQUEST FORM

Docket/Petition No.

Town/City

Date

1395A

Ansonia

October 8, 2020

Name:

City of Ansonia

Street Address:

253 Main Street

City, State, Zip:

Ansonia, CT 06401

Contact Number:

(203) 751-2854

E-mail:

jmarini@mzslaw.com

1. Manner in which intervenor's participation is in the interests of justice and will not impair the orderly conduct of the proceedings:

The Petition in this matter involves the installation of solar equipment in a residential neighborhood. The City of Ansonia seeks to participate in this matter as an intervenor for the purpose of raising local and municipal concerns not addressed by the Siting Council's initial interrogatories. This unique, additional perspective will assist the Siting Council in making a fair and informed decision on the merits of the pending Petition.

Further, municipal representation in this matter will ensure that the concerns of local residents and municipal agencies - such as Ansonia's land use boards and public safety departments- are adequately represented, thereby serving the interests of justice. The City of Ansonia is in the best position to communicate the concerns of these local parties in an orderly and productive manner.

The City of Ansonia's participation will allow the Siting Council to obtain valuable insight into the Petition without interfering or impeding the proceeding. The City of Ansonia is represented by the undersigned legal counsel who will at all times respect the rules and procedure of the Siting Council, and its role in making a determination in this matter.

2. Manner and extent to which intervenor proposes to participate:

The City of Ansonia proposes to participate by propounding a set of interrogatories upon the Petitioner, Windham Solar, LLC, which will seek information and insight relative to issues not already addressed in the Siting Council's first set of interrogatories to the Petitioner. These interrogatories will be tailored to the local concerns of residents, municipal land use boards, and Ansonia's public safety departments.

Moreover, the City of Ansonia seeks to be allowed to participate in any hearing scheduled in this matter for the purpose of calling witnesses and experts, and cross-examining the Petitioner with respect to local/municipal concerns. The City of Ansonia is also requesting the ability to make oral statements at the hearing, and submit briefs to the Siting Council summarizing allegations of fact and statements of witnesses presented during the hearing.

3. Statutory authority for intervenor request:

The City of Ansonia relies on CGS 4-177a (b), 16-50n, 16-50o, 22a-120, and 22a-163j, and RSA 16-50j-15a through 17 in making this request to participate as an intervenor in this matter.

4. Nature of evidence intervenor intends to present:

The City of Ansonia intends to present evidence relative to the proposed solar project's impact on public health, safety, and welfare, and the impact to the local environment and wetlands.

Copies of this request are required to be electronically mailed to all participants on the service list, which can be found on our website in Pending Proceedings under the appropriate docket or petition number, at least five days before the date of the public hearing.

Signature

John P. Marini

Date

October 7, 2020