



John P. Marini
Corporation Counsel

City of Ansonia

Office of Corporation Counsel
253 Main Street
Ansonia, Connecticut 06401

Office: (203) 751-2854
Fax: (203) 734-3853
Email: jmarini@mzslaw.com

February 3, 2021

By Certified Mail and Electronic Mail at: siting.council@ct.gov

Melanie A. Bachman
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

RE: PETITION NO. 1395A – Windham Solar LLC amended petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of one 1.0-megawatt (MW) and one 0.99 MW solar photovoltaic electric generating facilities located at 31 Benz Street, Ansonia, Connecticut.

Dear Ms. Bachman:

The Intervening Party, City of Ansonia, hereby requests permission from the Siting Council to serve the attached interrogatories upon the Petitioner, Windham Solar, LLC. As set forth in the City of Ansonia's approved Request for Intervenor Status, the Intervenor seeks to raise local and municipal concerns not addressed by the Council's initial interrogatories.

Sincerely,

John P. Marini
Counsel for the Intervenor

CC: Steve Broyer
Ecos Energy LLC
222 South 9th Street Suite 1600
Minneapolis, MN 55402
steve.broyer@ecosrenewable.com

Petition No. 1395A
Intervenor Interrogatories
February 3, 2021

1. The petition makes reference to sheep and grazing. Does this use conform to the municipal regulations regarding the keeping of livestock, farming, and the minimum setbacks required for structures incidental to, and associated with farming and grazing activities?
2. The petition makes reference to sheep and grazing on the same site, parcel, and project located at 31 Benz Street, while the majority of the petition and supporting material refers to a solar development project. Is Petitioner's intention to develop a mixed-use project at 32 Benz Street? And if so, is this use permitted in either the enabling state legislation or the municipal zoning regulations?
3. The current State Plan of Conservation and Development Locational Guidemap identifies the land subject to this petition as being in the priority funding areas of 3 and 4. Is Petitioner's proposed development consistent with the state's Plan of Conservation and Development?
4. Describe the visibility of the project and project apparatus (such as solar panels) from Benz Street, and the surrounding private residences.