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July 2, 2020

Ms. Melanie Bachman Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

Re:

Petition No. 1401-1410 dated June 4, 2020 Greenskies Clean Energy, LLC, Petitoner

Dear Ms. Bachman:

As you know, this office represents Douglas Hanson in connection with the Petition by Greenskies Clean Energy, LLC. This letter is to request that Mr. Douglas Hanson of 6 Woodland Court, Pawcatuck, Connecticut be given party status for the following petition:

PETITION NO. 1410 - 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.

The request is made pursuant to C.G.S. § 16-50 and C.G.S. § 4-177a(a). A Party Status Request Form is being submitted herewith. We have signed the Request form as counsel for Mr. Hanson. Please advise if you require a form executed by Mr. Hanson personally.

We would respectfully request that correspondence be sent to Mr. Hanson electronically at the email address noted on the Request form with a copy to our office at mbonnano@geraghtybonnano.com and jfriedler@geraghtybonnano.com.

Ms. Melanie Bachman Connecticut Siting Council July 2, 2010 Page 2 of 2

Very truly yours,

Jonathan E. Friedler,

Enclosure

cc: Client

Gina L. Wolfman, Greenskies Clean Energy, LLC

electronically at <u>Gina.wolfman@cleanfocus.us</u> and first class mail Lee D. Hoffman, Esq. electronically at <u>Lhoffman@pullcom.com</u>

and by first class mail



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051
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E-Mail: siting.council@po.state.ct.us
Web Site: www.ct.gov/csc

PARTY STATUS REQUEST FORM

Docket/Petition No.	Town/City	Date
1401-1410	Stonington	06/04/2020
Name:		
Douglas Hanson		
Street Address:		
6 Woodland Court		
City, State, Zip:		
Pawcatuck, CT, 06379		
Contact Number:		
(860) 941-8202		
E-mail:		
groovyviking@yahoo.com		

1. Manner in which party's legal rights, duties, or privileges will be specifically affected by the agency's decision in this contested case:

Mr. Hanson ("Hanson") owns property that directly abuts the land on which Greenskies Clean Energy, LLC ("Petitioner") seeks to construct, operate, and maintain its Solar Electric Facility (the "Proposed Facility"). The Proposed Facility is to be constructed on Elm Ridge Road and N. Anguilla Road, in Pawcatuck, Connecticut. Hanson is the owner of the property located at 6 Woodland Court, Pawcatuck, CT. Attached hereto as Exhibit A is a map detailing the proximity of Hanson's property to the Proposed Facility. Hanson, as the owner of his property, has the right and privilege to the quiet enjoyment of the same, free from any nuisance that did not pre-exist his ownership thereof. Mr. Hanson will have a direct line of sight to the Proposed Facility from his property; construction of the Proposed Facility will have a negative visual impact. If the Proposed Facility is built as contemplated in the petition, glare and noise (from the array, inverters and fans cooling them) will be a constant interference to Hanson's quiet enjoyment of his property. The array will require operation and maintenance, which will cause additional noise and disturbance. Additionally, construction and maintenance of the Proposed Facility will have a deleterious effect on the value of his property. Thus, if the Siting Counsel approves the petition, Hanson will be aggrieved by that determination. As this request to be made a party is timely, it will not impair the orderly conduct of these proceedings.

	2.	Manner	and	extent to	which	party	proposes	to	partici	oate
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Mr. Hanson, as an adjacent property owner, opposes the petition, and the construction, maintenance, and operation of an electric generating facility on the parcels identified in the petition. Mr. Hanson proposes to participate as a party to the petition as an objector thereto, for the reasons set forth above. Mr. Hanson seeks to participate fully in the proceedings, including but not limited to, the submission of testimony (his own, and that of expert witnesses), interrogatories and documentary evidence concerning the Proposed Facility, as well as present testimony and witnesses in the event the Council elects to conduct a hearing, as well as any post-hearing filings or proceedings. Testimony will regard the visibility of the Proposed Facility from various locations of Hanson's property, which will be supplemented with drone photographs. Hanson will introduce testimony regarding concerns relating to the substantial adverse impact the Proposed Facility will have on the value of his property, as well as his quiet use and enjoyment of the same. Hanson will produce testimony and evidence that there are better locations for the Proposed Facility that do not impact or affect the rights and privileges of property owners such as himself.

3. Statutory authority for party request:

CT General Statutes, Section 16-50 CT General Statutes, Section 4-177a(a)

4. Nature of evidence party intends to prese	esent	4.
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Please see above for a summary of the testimony Hanson intends to present in form of his own testimony and that of expert witnesses. The Petitioner will also offer documentary evidence regarding viable alternative locations for the Proposed Facility.

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

Douglas Hanson

Date

7/2/2020

By:

Jonathan E. Friedler

Michael S. Bonnano

Geraghty & Bonnano, LLC 38 Granite Street, P. O. Box 231

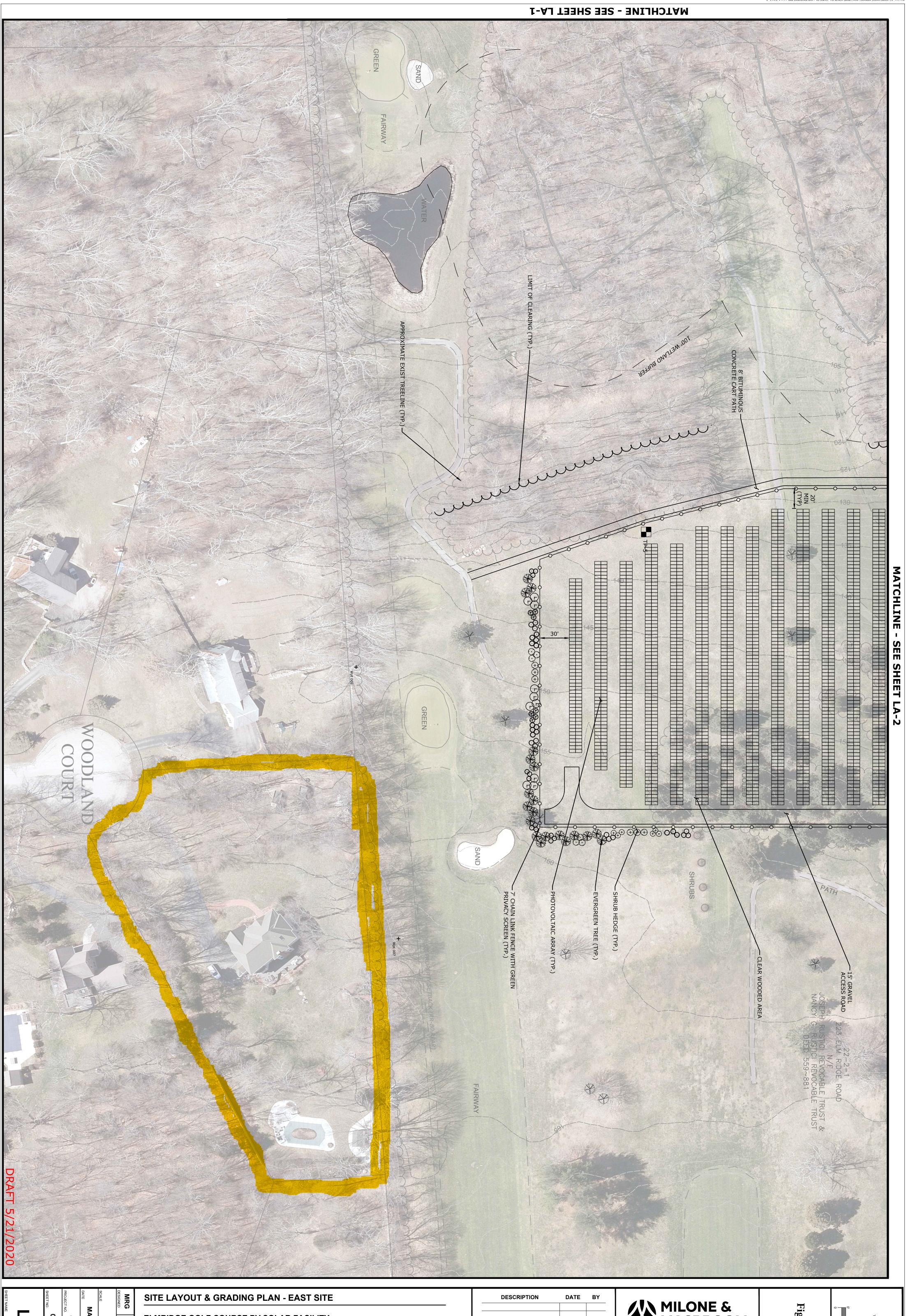
New London, CT 06320

860-447-8077 / Fax 860-447-9833

His Attorneys

jfreidler@geraghtybonnano.com

mbonnano@geraghtybonnano.com



HEET NAME

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MAY 19, 2020
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OJECT NO.

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ELMRIDGE GOLF COURSE PV SOLAR FACILITY GREENSKIES CLEAN ENERGY LLC

229 ELMRIDGE ROAD

STONINGTON, CONNECTICUT

NOT FOR CONSTRUCTION

