



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@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

July 2, 2020

Jonathan E. Friedler, Esq.
Geraghty & Bonnano, LLC
38 Granite Street, P.O. Box 231
New London, CT 06320

RE: **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 parcel sat 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.

Dear Attorney Friedler:

The Connecticut Siting Council (Council) is in receipt of your letter of July 2, 2020, requesting Party status for Douglas Hanson in Petition No. 1410.

Your request will be placed on the next meeting agenda, a copy of which will be sent to you. Your attendance is welcome, but is not required. You will be notified of the Council's determination immediately thereafter.

All documents filed to date are available at the Council's office or on our website under pending matters.

Please contact me if you have any questions.

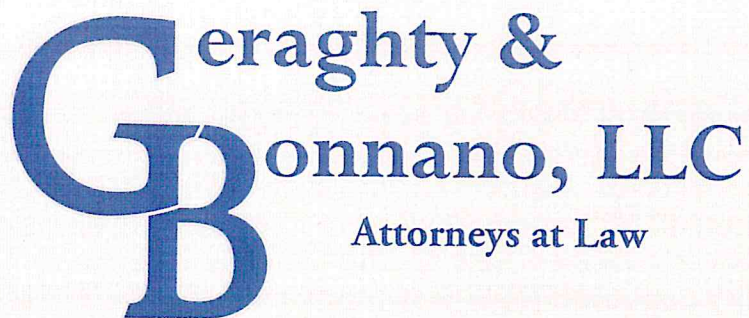
Sincerely,

s/ Melanie A. Bachman

Melanie A. Bachman
Executive Director

MB/emr

c: Council Members
Service List
Douglas Hanson



PAUL M. GERAGHTY*
MICHAEL S. BONNANO
JOHANNA McCORMICK
MARK A. DUBOIS†
PATRICIA A. KING**
JONATHAN E. FRIEDLER††

*Also Admitted in New York
† Board Certified, Trial Advocate

**Se habla español

†† Also Admitted in Massachusetts and North Dakota

Jfriedler @geraghtybonnano.com

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, Petitioner

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.

Replies to New London only at:

38 GRANITE STREET, PO BOX 231
NEW LONDON, CONNECTICUT 06320

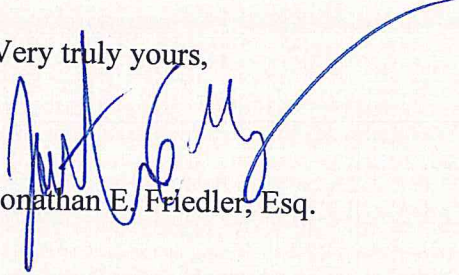
WWW.GERAGHTYBONNANO.COM

131 DWIGHT STREET
NEW HAVEN, CONNECTICUT 06511

TELEPHONE (860) 447-8077 / FAX (860) 447-9833

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

Very truly yours,


Jonathan E. Friedler, Esq.

Enclosure

cc: Client
Gina L. Wolfman, Greenskies Clean Energy, LLC
electronically at Gina.wolfman@cleanfocus.us and first class mail
Lee D. Hoffman, Esq. electronically at Lhoffman@pullcom.com
and by first class mail



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

PARTY STATUS REQUEST FORM

Docket/Petition No.

1401-1410

Town/City

Stonington

Date

06/04/2020

Name:

Douglas Hanson

Street Address:

6 Woodland Court

City, State, Zip:

Pawcatuck, CT, 06379

Contact Number:

(860) 941-8202

E-mail:

groovyvikings@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 participate:

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 present:

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.

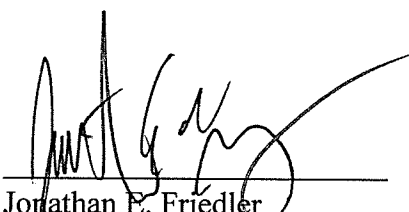
Signature

Date

Douglas Hanson

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

WOODLAND COURT

LIMIT OF CLEARING (TYP.)

APPROXIMATE EXIST TREELINE (TYP.)

100' WETLAND BUFFER

8' BITUMINOUS CONCRETE OAK PATH

20' MIN (TYP.)

TH-3

30'

15' GRAVEL ACCESS ROAD

22-2-1

JOSEPH G. RUSTICI, REVOCABLE TRUST & NANCY G. RUSTICI, REVOCABLE TRUST DEED 559~881

CLEAR WOODED AREA

SHRUBS

SHRUB HEDGE (TYP.)

EVERGREEN TREE (TYP.)

PHOTOVOLTAIC ARRAY (TYP.)

7' CHAIN LINK FENCE WITH GREEN PRIVACY SCREEN (TYP.)

FAIRWAY

GREEN

SAND

WATER

WOODLAND COURT

DRAFT 5/21/2020

MATCHLINE - SEE SHEET LA-1

MRG	HMM	MRA
DESIGNED	DRAWN	CHECKED
1"=40'		
SCALE		
MAY 19, 2020		
DATE		
6763-10		
PROJECT NO.		
09 OF 15		
SHEET NO.		
LA-3		
SHEET NAME		

**229 ELMRIDGE ROAD
STONINGTON, CONNECTICUT**

NOT FOR CONSTRUCTION

[illegible]

Figure 6C

