



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](mailto:siting.council@ct.gov)

Web Site: [portal.ct.gov/csc](http://portal.ct.gov/csc)

**VIA ELECTRONIC MAIL**

September 23, 2020

Bruce L. McDermott, Esq.  
Murtha Cullina LLP  
265 Church Street  
New Haven, CT 06510  
[bmcdermott@murthalaw.com](mailto:bmcdermott@murthalaw.com)

RE: **PETITION NO. 1425** – Gaylord Mountain Solar Project 2019, 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 1.9-megawatt AC solar photovoltaic electric generating facility located at 360 Gaylord Mountain Road in Hamden, Connecticut, and associated electrical interconnection.

Dear Attorney McDermott:

The Connecticut Siting Council (Council) is in receipt of your letter of September 21, 2020, requesting Intervenor status for the South Central Connecticut Regional Water Authority (RWA) in Petition No. 1425.

Your request will be placed on the next meeting agenda, a copy of which will be sent to you. 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

MAB/FOC/laf

c: John Hudak, RWA ([jhudak@rwater.com](mailto:jhudak@rwater.com))  
Service List, dated August 10, 2020

BRUCE L. MCDERMOTT  
203.772.7787 DIRECT TELEPHONE  
860.240.5723 DIRECT FACSIMILE  
BMCDERMOTT@MURTHALAW.COM



September 21, 2020

Melanie A. Bachman, Esq.  
Executive Director/Staff Attorney  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re: Petition No. 1425 – Gaylord Mountain Solar Project 2019, 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 1.9-megawatt AC Solar Photovoltaic Electric Generating Facility Located at 360 Gaylord Mountain Road in Hamden, Connecticut, and Associated Electrical Interconnection

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council (the “Council”) is the South Central Connecticut Regional Water Authority’s (“RWA”) Motion to Intervene in the above-captioned petition.

Given the Council’s modifications to its hard copy filing requirements as part of its response to the COVID-19 pandemic, by this letter, the RWA submits to the Council and the service list an electronic copy of the motion and one hard copy of the filing will be mailed to the Council’s office.

Should the Council have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Bruce L. McDermott".

Bruce L. McDermott

Enclosure

cc: Service List

**Murtha Cullina LLP**  
265 Church Street  
New Haven, CT 06510  
T 203.772.7700  
F 203.772.7723

BRUCE L. MCDERMOTT  
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Executive Director/Staff Attorney  
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Bruce L. McDermott

Enclosure

cc: Service List

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STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Gaylord Mountain Solar Project 2019, LLC Petition	:	Petition No. 1425
for a Declaratory Ruling, Pursuant to Connecticut	:	
General Statutes §4-176 and §16-50k, for the	:	
Proposed Construction, Maintenance and	:	
Operation of a 1.9-megawatt AC Solar	:	
Photovoltaic Electric Generating Facility Located	:	
at 360 Gaylord Mountain Road in Hamden,	:	
Connecticut, and Associated Electrical	:	
Interconnection.	:	September 21, 2020

South Central Connecticut Regional Water Authority's  
Motion to Intervene

Pursuant to Connecticut General Statutes Section 16-50n, the South Central Connecticut Regional Water Authority (the "Authority" or the "RWA") hereby petitions the Connecticut Siting Council ("Council" or "CSC") to be designated as an intervenor in the above-captioned proceeding. The RWA represents that its participation is in the interests of justice and the environment and its participation will not impair the orderly conduct of the proceeding. In support of this petition, the Authority states as follows:

1. RWA Background

The RWA is a non-profit regional public corporation and a political subdivision of the state whose mission is to provide customers with high quality water and service at a reasonable cost while promoting the preservation of watershed land and aquifers. RWA is a fully self-funded non-profit authority that derives its revenues primarily through its water supply services. The RWA supplies an average of 43 million gallons per day to

approximately 430,000 people in a fifteen-municipality region centered in New Haven, Connecticut and maintains 1,700 miles of distribution mains and more than 118,000 services across 260 square miles. The RWA owns and operates all of its sources of supply, which consist of 10 active reservoirs and seven wellfields. The RWA owns over 27,000 acres of land, most of which is forested and held for the protection of the public water supply.

2. RWA Should Be Granted Intervenor Status

The RWA owns property that abuts the proposed 1.9 megawatt solar photovoltaic facility to be located at 360 Gaylord Mountain Road in Hamden (the “Site”). Petition, Exhibit E. As put forth in the Department of Public Health’s (“DPH”) September 8, 2020 letter, the Site is within the public water supply watershed (Mill River System) of Lake Whitney Reservoir, an active source of public drinking water for the RWA. The RWA has invested millions of dollars in acquiring and preserving forestlands to protect its sources of water, including thousands of acres of contiguous forest adjoining the proposed project property. As reflected in the DPH letter, source water protection is critically important to the RWA and its customers. The RWA’s participation in the petition will assist the Council in its consideration of the potential impacts on the watershed from clear cutting of 12 acres of mature forest, erosion of the site’s soils and the potential for concentrated runoff and sediment and nutrient inputs to Eaton Brook and the Mill River.

The Authority has not yet determined the scope of its participation in this matter and reserves the right to fully participate, including through participation at hearings convened by the Council, submission of interrogatories and briefs.

A copy of all such correspondence or communications should be sent to the following individuals:

Murtha Cullina LLP  
265 Church Street  
New Haven, CT 06510  
Attn: Bruce L. McDermott  
Phone: 203-772-7787  
[bmcdermott@murthalaw.com](mailto:bmcdermott@murthalaw.com)

Regional Water Authority  
90 Sargent Drive  
New Haven, CT  
Attn: John Hudak  
Phone: 203-401-2733  
[jhudak@rwater.com](mailto:jhudak@rwater.com)

3. Conclusion

Accordingly, for the foregoing reasons stated herein, RWA requests that it be designated an intervenor in this proceeding.

Respectfully submitted,

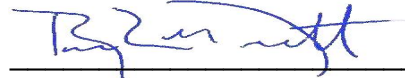
On behalf of South Central Connecticut  
Regional Water Authority

By:  \_\_\_\_\_

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Murtha Cullina LLP  
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New Haven, CT 06510  
Tel: (203) 772-7787  
[bmcdermott@murthalaw.com](mailto:bmcdermott@murthalaw.com)

CERTIFICATION

I hereby certify that a copy of the foregoing was sent to all participants of record as reflected on the Connecticut Siting Council's service list on this 21<sup>st</sup> day of September, 2020.



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Bruce L. McDermott