

August 31, 2023

Via Hand Delivery

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

Re: **PETITION NO. 1572 – East Windsor Solar Two, LLC and VCP, LLC d/b/a Verogy
Petition for a Declaratory Ruling that a Certificate of Environmental Compatibility
and Public Need is not Required for the Construction, Operation and Maintenance
of a 4.0 MW AC Solar Photovoltaic Project at 31 Thrall Road, East Windsor,
Connecticut**

Dear Attorney Bachman:

In accordance to the Siting Council's schedule, enclosed please find the original and fifteen (15) copies of the following:

1. A Sign Posting Affidavit verifying that the public notice sign was posted of the subject property on August 23, 2023.
2. The Petitioner's Prehearing Submission identifying its witnesses and hearing exhibits.
3. An electronic copy of Figure 3 from the Petition to be referenced in the Petitioner's presentation prior to the Public Hearing Session of September 7, 2023.
4. An Environmental and Community Noise Assessment for the East Windsor Solar Two Project dated August 31, 2023.
5. The Petitioner's responses to Town of East Windsor Interrogatories dated August 31, 2023.
6. Resumes for witnesses appearing on behalf of East Windsor Solar Two, LLC.

Melanie Bachman
August 31, 2023
Page 2

If you have any questions or need any additional information regarding these matters,
please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth C. Baldwin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kenneth C. Baldwin

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
A PETITION FOR A DECLARATORY	:	PETITION NO. 1572
RULING THAT A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED IS NOT REQUIRED FOR	:	
THE CONSTRUCTION, OPERATION AND	:	
MAINTENANCE OF A 4.0 MW AC SOLAR	:	
PHOTOVOLTAIC PROJECT AT 31 THRALL	:	
ROAD, EAST WINDSOR, CONNECTICUT	:	AUGSUT 31, 2023

PRE-HEARING SUBMISSION

East Windsor Solar Two, LLC, a wholly owned subsidiary of Verogy Holdings, LLC (“EWST”) hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information currently available regarding the above-referenced matter.

A. List of Witnesses

1. Bradley J. Parson, P.E. PMP, Director of Design and Permitting, East Windsor Solar Two LLC
2. Bryan Fitzgerald, Director of Development, East Windsor Solar Two LLC
3. Andy Roland, Senior Project Manager, Environmental Engineer, WSP
4. Robert Burns, P.E., All-Points Technology Corp. P.C.
5. Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp. P.C.

B. Exhibits to be offered

EWST intends to offer the following Exhibits:

1. Petition for Declaratory Ruling No. 1572 including all related Figures and

Appendices dated May 5, 2023.

2. EWST's Responses to Council Interrogatories dated July 18, 2023.
3. Sign Posting Affidavit dated on August 24, 2023.
4. EWST's Responses to Town of East Windsor Interrogatories dated August 31, 2023.
5. WSP Environmental & Community Noise Assessment dated August 31, 2023
6. Resumes and/or CVs of the EWST witness panel:
 - a. Bradley J. Parsons
 - b. Bryan Fitzgerald
 - c. Andy Roland
 - d. Robert Burns, P.E.
 - e. Dean Gustafson


EWST reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

C. Remote Public Comment Session

Prior to the start of the Remote Public Comment Session, Bradley Parsons, P.E. PMP, Director of Design and Permitting, will make a brief presentation describing the site features and proposed site improvements. Mr. Parsons will refer to Figure 3, on page 10 of the Petition. A copy of Figure 3 is attached to this filing.

Respectfully submitted,

EAST WINDSOR SOLAR TWO, LLC

By: 

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of August, 2023, a copy of the foregoing was sent, via electronic mail, to:

Town of East Windsor
Robert M. DeCrescenzo, Esq.
Updike, Kelly & Spellacy, P.C.
Goodwin Square
225 Asylum Street, 20th Floor
Hartford, CT 06103
rdecrescenzo@uks.com



Kenneth C. Baldwin