

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

PETITION OF TRITEC AMERICAS, LLC	:	PETITION NO.: 1583
FOR A DECLARATORY RULING THAT	:	
NO CERTIFICATE OF ENVIRONMENTAL	:	
COMPATABILITY AND PUBLIC NEED IS	:	
REQUIRED FOR THE CONSTRUCTION,	:	
OPERATION, MAINTENANCE AND	:	
DECOMMISSIONING OF A 0.999 MW AC	:	
SOLAR PHOTOVOLTAIC PROJECT IN	:	
BETHANY, CONNECTICUT	:	August 1, 2023

PETITION OF THE TOWN OF BETHANY FOR PARTY STATUS

Pursuant to Conn. Gen. Stat. § 4-177a (a) and § 16-50j-14 of the Regulations of Connecticut State Agencies, the Town of Bethany (“Bethany”) hereby moves the Connecticut Siting Council (“CSC”) to designate Bethany as a party in the above captioned proceeding. In support of this petition, Bethany states the following:

1. On July 11, 2023, TRITEC Americas, LLC (“TRITEC”) filed a petition for a declaratory ruling that no certificate of environmental compatibility and public need is required for the commissioning, operation, maintenance and decommissioning of a 0.999 MW AC Solar photovoltaic project (the “Proposed Facility”) in the Town of Bethany (the “Petition”) on property known as 428 Bethmour Road and Bethmour Road (the “Properties”).
2. Also on that date, TRITEC filed a notice of election to waive the exclusion of jurisdiction of its proposed facility from the Siting Council’s jurisdiction, which deprived the local agencies of jurisdiction over TRITEC’s proposed project.
3. 428 Bethmour Road (113-1-4) is located in a R-65 zone, consists of 2.05 acres and has a single family residential dwelling constructed on it.

4. Bethmour Road (113-1) is located in a R-65 zone and consists of 19.65 woodland acres.
5. The Properties immediately abut nineteen (19) single family residential dwellings and is in the heart of the R-65 residential zone.
6. According to the Proposed Conditions Viewshed Map, the proposed solar facility installation is predicted to be visible year-round. *See Petition at Exhibit E, 18 of 19.*
7. Electric energy usage is expected to increase slightly over the 10-year forecast period by 0.1% per year, while peak demand is expected to increase by 0.4% per year during this time. *See Eversource Energy 2023 Forecast of Loads and Resources at 7.*
8. The impact to the residential zone in the Town of Bethany is substantially greater than the contribution achieved by the proposed project with achieving the State's energy goals.

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

Bethany seeks to participate on behalf of the interests of its constituents.

Bethany and its constituents' legal rights, duties and privileges will be

specifically affected by the decision of the CSC in this contested case and its participation in this proceeding is necessary to represent those interests. The

Proposed Facility is proposed to be located in a residential zone, immediately adjacent to nineteen (19) established single-family homes.

TRITEC has already begun colonizing honeybees along a fence-line of the proposed location. TRITEC's conduct has already negatively altered the local environment and impacted the adjoining's use and enjoyment of their properties.

Additionally, the proposed location risks the Town's tax base. Specifically, it is unknown whether locating the Proposed Facility in immediate proximity of established residential properties will negatively impact the value of those properties. It is known however, that TRITEC's mismanagement of the colonization of honeybees already interfered with the use and enjoyment of area residential properties.

Bethany's Wildlife

According to a DEEP Natural Diversity Data Base (NDDDB) Determination letter, dated November 17, 2020, that identified three State-listed Special Concern species as occurring in the vicinity of this project site: the eastern box turtle, the wood turtle, the brown thrasher and the Northern Long-eared Bat *Myotis septentrionalis*. A biologist should be required to perform a site inspection to identify whether any of these three listed concerns are identified on the proposed site.

Water Quality

10. Manner and extent to which Bethany proposes to participate:

Bethany proposes to participate in this proceeding relative to the issues associated with the Petition, including but not limited to participation in any hearings held by the Council, cross examination of witnesses, submission of prefiled testimony or other written exceptions and participation in oral argument, if any.

11. Statutory authority for party status request:

Conn. Gen. Stat. §§ 4-177a (a), 16-50l (c), 16-50n (a) and 22a-14 through 22a-20 of the Connecticut General Statutes.

12. Nature of evidence that the party seeks to present:

Bethany proposes to participate in this proceeding relative to the issues associated with the Petition, including but not limited to participation in any hearings held by the Council, cross examination of witnesses, submission of prefiled testimony or other written exceptions and participation in oral argument, if any.

As the legal rights, duties and privileges of the residents of Bethany are directly affected by this proceeding, Bethany respectfully requests that the Council grant it party status. This Petition is filed before any scheduled hearing on the merits of the Petition.

Correspondence, documents and other materials concerning the Petition should
be served upon:

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Respectfully submitted,

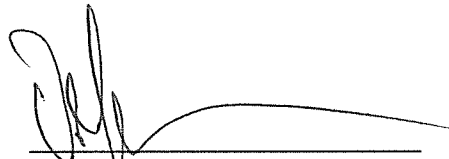
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CERTIFICATE OF SERVICE

In accordance §16-50j-12 of the Regulations of Connecticut State Agencies, I hereby certify a copy of the foregoing was delivered by electronic mail and regular mail, postage prepaid, to the following service list on August 1, 2023.

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