

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

TRITEC Americas, LLC notice of election to	:	Petition No. 1583
waive exclusion from Connecticut Siting Council	:	
jurisdiction, pursuant to Connecticut General	:	
Statutes §16-50k(e), and petition for a declaratory	:	
ruling, pursuant to Connecticut General Statutes	:	
§4-176 and §16-50k, for the proposed construction,	:	
maintenance and operation of a 0.999-megawatt AC	:	
solar photovoltaic electric generating facility located	:	
at Parcel Nos. 113-1 and 113-1-A, 428 Bethmour	:	
Road, Bethany, Connecticut, and associated	:	
electrical interconnection	:	September 21, 2023

THE TOWN OF BETHANY'S PREHEARING FIRST SET
OF INTERROGATORIES DIRECTED TO TRITEC AMERICAS, LLC

The Town of Bethany (Town) hereby submits the following first set of Interrogatories to TRITEC Americas, LLC (TriTEC) in connection with the above captioned administrative proceeding pending before the Connecticut Siting Counsel.

1. State the date that TriTEC first communicated with the Town regarding its plan to locate a solar photovoltaic facility in the Town of Bethany.

ANSWER

2. Identify the agent, employee, member or representative who first communicated with the Town regarding TriTEC's plan to locate a solar photovoltaic facility in the Town of Bethany.

ANSWER

3. Identify the town employee or town official who TriTEC's agent, employee, member or representative communicated with for that first communication with the Town

ANSWER

4. State with specificity TriTEC's purpose for making that first communication with the Town.

ANSWER

5. Did TriTEC's meet with the Town on September 9, 2022 to consult with the Town about its initial proposal to locate a 1.375 MW AC solar project in the Town of Bethany?

ANSWER

6. If the answer to Interrogatory numbered 6 was "yes," then state:

- a. the date that TriTEC consulted with the Town;

ANSWER

- b. who was present at that consultation;

ANSWER

- c. where the consultation was held;

ANSWER

d. whether TriTec provided the First Selectwoman of the Town at that consultation with:

i. any technical reports concerning the public need;

ANSWER

ii. the site selection process; and

ANSWER

iii. the environmental effects of the proposed facility

ANSWER

7. If TriTEC failed to provide the First Selectwoman of the Town at that consultation with any technical reports concerning the public need, the site selection process; and the environmental effects of the proposed facility, explain why it failed to do so.

ANSWER:

8. During its consultation meeting with the Town held on September 9, 2022, state whether the Town requested that a meeting be held with the public regarding TriTEC's proposal to gather the public's concerns about the project.

ANSWER

9. State whether such a public meeting was ever held.

ANSWER

10. If the answer to Interrogatory numbered 10 is "yes," then state:

a. The date that the public meeting was held;

ANSWER

b. Where the public meeting was held;

ANSWER

c. How many members from the public attended the public meeting;

ANSWER

d. Whether any town employee or town official attended the public meeting.

ANSWER

11. Prior to the date when TriTEC filed its petition with the Siting Council, state whether TriTEC approached the Town to discuss whether any of the open space parcels that it owns, totaling about 480 acres in the aggregate, would provide a viable alternate site.

ANSWER:

12. If the answer to interrogatory 13 was “yes,” then state:

a. the date TriTEC’s discussions with the Town occurred;
ANSWER

b. the identify of the town employee(s) or town official(s) with whom TriTEC spoke;
ANSWER

c. what was discussed; and
ANSWER

d. why there were no viable alternate site locations to locate TriTEC’s proposed facility.
ANSWER

13. Prior to the date when TriTEC filed its petition with the Siting Council, state whether TriTEC approached the Bethany Land Trust to discuss whether any of the open space parcels that it owns, totaling about 480 acres in the aggregate, would provide a viable alternate site.

ANSWER:

14. If the answer to interrogatory 14 was “yes,” then state:

a. the date TriTEC’s discussions with the Land Trust occurred;
ANSWER

b. the identity of the Land Trust representative with whom TriTEC spoke;
ANSWER

- c. what was discussed; and

ANSWER

- d. why there were no viable alternate site locations to locate TriTEC's proposed facility.

ANSWER

15. Prior to the date when TriTEC filed its petition with the Siting Council, state whether TriTEC approached the State of Connecticut to discuss whether any of the open space parcels that it owns, totaling about 480 acres in the aggregate, would provide a viable alternate site.

ANSWER:

16. If the answer to interrogatory 16 was "yes," then state:

- a. the date TriTEC's discussions with the State occurred;

ANSWER

- b. the identity of the State representative with whom TriTEC spoke and identify the department where the representative is associated;

ANSWER

- c. what was discussed; and

ANSWER

- d. why there were no viable alternate site locations to locate TriTEC's proposed facility.

ANSWER

- 17. Prior to the date when TriTEC filed its petition with the Siting Council, state whether TriTEC approached the the South-Central Connecticut Regional Water Authority ("Water Authority") to discuss whether any of the open space parcels that it owns, totaling about 480 acres in the aggregate, would provide a viable alternate site

ANSWER:

- 18. If the answer to interrogatory 18 was "yes," then state:

- a. the date TriTEC's discussions with the Water Authority occurred;

ANSWER

- b. the identity of the Water Authority's representative with whom TriTEC spoke;

ANSWER

- c. what was discussed; and

ANSWER

- d. why there were no viable alternate site locations to locate TriTEC's proposed facility.

ANSWER

19. Describe outreach efforts to project abutters. Have any abutters requested further information?

ANSWER

20. Will any residences have year-round views of the solar array areas/fencing? Can landscaping be installed to mitigate views?

ANSWER:

21. There is no public water supply in the area immediately surrounding the project site. Will TriTEC perform regular testing of area wells to ensure no contamination has occurred? If contamination is detected, will TriTEC agree to remediate the contamination? How will TriTEC protect area wells and/or water quality from potential construction and operational impacts? Will there be a reconstruction baseline testing of the aquifer?

ANSWER:

22. Has the manufacturer of the proposed solar panels conducted Toxicity Characteristic Leaching Procedure (TCLP) testing to determine if the panels would be characterized as hazardous waste at the time of disposal under current regulatory criteria? If so, submit information that indicates the proposed solar modules would not be characterized as hazardous waste. If not, would EWST agree to install solar panels that are not classified as hazardous waste through TCLP testing?

ANSWER:

23. Would project decommissioning include stormwater management features? If yes, how would the stormwater management system be removed?

ANSWER:

24. Will a decommissioning bond be obtained for the decommissioning work? If so, please explain the details of the planned decommissioning bond.

ANSWER:

Respectfully submitted,
THE TOWN OF BETHANY

By: 

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CERTIFICATION OF SERVICE

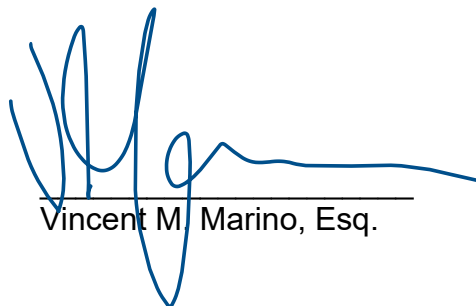
I hereby certify that on this date, a copy of the foregoing was delivered by electronic mail and/or US Mail, first class postage prepaid, to all parties and intervenors of record as follows:

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