

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 25, 2023 |

**JOINT REQUEST FOR STAY**

The parties, TRITEC Americas, LLC (“TRITEC”), the Town of Bethany (the “Town”) and Rural Bethany Association (“RBA”) submit this joint request for a stay of the above referenced proceedings, including a stay of the appeal period from the Conn. Gen. Stat. 16-50x (d) Orders entered by the Bethany Zoning Commission on September 12, 2023. For the foregoing reasons, the parties believe that good cause exists to stay these proceedings.

1. On July 11, 2023, TRITEC filed a petition with the Connecticut Siting Council (“CSC”) seeking declaratory relief to locate, construct, operate, maintain, and decommission a solar photovoltaic facility with a capacity of 0.999 MW AC and associated equipment inclusive of all solar panels, transformers, electrical switchgear, monitoring equipment, and access roadways (“Project”) on approximately 6.59 acres (leasehold area) of land located at 0 & 428 Bethmour Road in Bethany, Connecticut (“Project Site”).
2. On August 17, 2023, the CSC granted the Town party status.

3. The Town, along with numerous members from the public filed requests that the CSC hold a public hearing on TRITEC's petition.
4. On August 3, 2023, the CSC granted the requests for a public hearing, which is presently scheduled for October 5, 2023.
5. On September 1, 2023, the CSC granted RBA intervenor status.
6. Both the Town and RBA have expressed numerous concerns and opposition to the location of TRITEC's proposed facility at the Project Site, including but not limited to the Project Site's location in the middle of a residential zone and being immediately adjacent to many established residential homes.
7. On September 19, 2023, the Town filed a notice of municipal preference regarding the location of TRITEC's proposed facility. The Town was informed that the owner of a parcel in the Business and Industrial zone is willing to discuss locating TRITEC's proposed facility on her property at 795 Carrington Road (the "Alternate Site"). The Alternate Site consists of 7.5 acres that front state highway Route 69 and is just north of state highway Route 42. The Alternate Site is not located in the immediate vicinity of any established residential homes and is generally surrounded by undeveloped property or commercial use properties.
8. On September 22, 2023, the attorneys for TRITEC, the Town and RBA all participated in a conference call to discuss the Alternate Site and these proceedings. During that conference call, TRITEC informed the Town and RBA that it had begun its due diligence of the Alternate Site. The Town expressed its willingness to work with TRITEC to locate a suitable alternative site location in the event that the Alternate Site was not viable.

9. Based on the parties' conference call, the parties agree that staying these proceedings to allow TRITEC sufficient time to conduct its due diligence on the Alternate Site, and then TRITEC and the Town sufficient time to explore other alternative site locations is necessary, in the best interest of the parties, and will avoid wasting the administrative resources of the CSC.

WHEREFORE, the parties jointly state that good cause exists to stay this proceeding and request that the CSC stay all scheduled deadlines, including any appeal period related to the orders entered by the Bethany Zoning Commission. The parties request that the requested stay remain in place until they have filed a joint request to resume this proceeding.

Respectfully submitted,

**TRITEC AMERICAS, LLC**

DocuSigned by:

*Paul R. Michaud*

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**[SIGNATURE BLOCKS CONTINUE ON NEXT PAGE]**

**THE TOWN OF BETHANY**

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**RURAL BETHANY ASSOCIATION**

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