

CONNECTICUT SITING COUNCIL

IN RE:	:	PETITION NO. 1583
	:	
TRITEC AMERICAS, LLC NOTICE OF	:	
ELECTION TO WAIVE EXCLUSION FROM	:	
CONNECTICUT SITING COUNCIL	:	
JURISDICTION, 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 19, 2023

RURAL BETHANY ASSOCIATION’S PRE-HEARING INTERROGATORIES
(SET ONE) TO TRITEC AMERICAS, LLC

The following are the Rural Bethany Association’s (the “Association”) first set of Interrogatories to TRITEC Americas, LLC (“TRITEC”), dated September 19, 2023, in connection with the above-referenced petition before the Connecticut Siting Council:

1. Describe the scope and extent of TRITEC’s consultation with the Town of Bethany prior to TRITEC’s filing of the above-referenced petition regarding alternative sites for the proposed 0.999-megawatt AC solar photovoltaic electric generating facility.

Response:

2. If TRITEC did not consult with the Town of Bethany prior to the filing of the above-referenced petition, please provide the basis for TRITEC’s decision.

Response:

3. Describe the full extent of TRITEC’s due diligence, investigatory efforts and overall position relative to locating the proposed facility at an alternative site.

Response:

4. Provide documentation and TRITEC's analysis of all alternative sites for the proposed facility, the technical suitability of each alternative site and the data generated for each site.

Response:

5. If the proposed facility is constructed, explain how TRITEC will address the Association's concerns regarding the facility's visual impacts. Explain whether TRITEC will be amenable to installing additional landscaping to address or mitigate such concerns.

Response:

6. If the proposed facility is constructed, explain how TRITEC will address the Association's concerns regarding the facility's adverse impacts on the various bat species and State-listed Special Concern species identified in the Association's intervention petition.

Response:

7. Describe any and all discussions TRITEC held with the Town of Bethany's Fire Marshal regarding the proposed facility and explain the Fire Marshal's position concerning the feasibility of the proposed facility.

Response:

8. Describe the volume of trees and vegetation that TRITEC anticipates removing at the 428 Bethmour Road site in connection with construction and completion of the proposed facility.

Response:

9. Provide a complete copy of the latest version of TRITEC's stormwater management plan, analysis and report associated with the above-referenced petition.

Response:

10. If the proposed facility is constructed at 428 Bethmour Road, describe the process by which TRITEC will respond to any stormwater impacts on adjacent properties.

Response:

11. If the proposed facility is constructed at 428 Bethmour Road, explain whether TRITEC will conduct periodic groundwater and soil testing.

Response:

12. Describe the manner and procedures by which TRITEC will manage employees, agents, contractors, and vehicular traffic at the 428 Bethmour Road site if the proposed facility is constructed at the site.

Response:

13. Describe TRITEC's duration, time intervals and anticipated hours of operation and notice provisions for the construction, maintenance and operation of the proposed facility at the 428 Bethmour Road site.

Response:

14. Identify the beekeeper who is managing the beehives at 428 Bethmour Road and explain whether the beekeeper is registered in accordance with the Connecticut General Statutes.

Response:

15. Describe the procedures and practices that TRITEC or its agents have implemented or will implement to address any bee swarming that has occurred or will occur at properties adjacent to the 428 Bethmour Road site due to bees traveling from the 428 Bethmour Road site.

Response:

16. Explain whether TRITEC intends to conduct or commission a bat survey at 428 Bethmour Road to verify the presence or absence of the endangered Tri-Color bat and Little Brown bat.

Response:

17. Describe TRITEC's due diligence and efforts to date with the Connecticut Department of Agriculture for purposes of identifying other agricultural opportunities associated with the proposed facility.

Response:

18. Identify the substances that TRITEC or its agent will utilize to clean the solar panels associated with the proposed facility.

Response:

19. Identify the materials that comprise the solar panels and whether said materials are toxic or hazardous to public health or the environment.

Response:

20. Provide the basis for TRITEC's decision, as indicated in its Operations and Maintenance Plan, to only conduct inspections once each year for changes in environmental conditions.

Response:

21. Provide copies of TRITEC's surveys illustrating the proposed facility's location relative to the residential parcel located at 432 Bethmour Road.

Response:

22. Explain whether TRITEC intends to pursue any easements over Glenwood Court or Rolling Green Road in connection with the proposed facility.

Response:

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was delivered by electronic mail and regular mail, postage prepaid, to the following service list on September 19, 2023:

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Dated: September 19, 2023
Danbury, CT



Joseph P. Mortelliti