

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 5, 2023

PRE-HEARING SUBMISSION OF RURAL BETHANY ASSOCIATION

The Rural Bethany Association (the “Association”), an intervenor in this proceeding as of August 31, 2023, hereby provides the Connecticut Siting Council (the “Council”) with the following pre-hearing information available at this time relative to the above-referenced Petition filed by TRITEC AMERICAS, LLC (“TRITEC”) on or about July 11, 2023.

A. List of Anticipated Witnesses

1. Steven D. Trinkaus, PE, Principal Engineer, Trinkaus Engineering, LLC.
 - Mr. Trinkaus’ pre-filed testimony will in part address the merits of TRITEC’s application and the design of the photovoltaic electric generating facility. Mr. Trinkaus’ pre-filed testimony will also provide an analysis of specific exhibits submitted by TRITEC as part of TRITEC’s application to the Council.

2. Sigrun. N. Gadwa, MS, Carya Ecological Services, LLC.
 - Ms. Gadwa’s pre-filed testimony will in part identify the ecological and environmental intricacies of the subject property where TRITEC anticipates constructing the proposed photovoltaic electric generating facility. Ms. Gadwa’s pre-filed testimony will also in part identify various flora and fauna

that exist at the subject property and discuss how the facility will adversely impact said flora and fauna and the forest habitat at the subject property.

3. Richard Cogill, Fire Chief, Bethany Volunteer Fire Department.
 - Mr. Cogill's pre-filed testimony will in part discuss concerns that the proposed photovoltaic electric generating facility presents from a municipal fire safety/fire protection perspective. Mr. Cogill's pre-filed testimony will also raise the issue of alternative sites for the proposed facility based on the Town of Bethany's limitations with respect to providing a sufficient water supply at the subject property in the event of a fire.
4. Paul Buckley Reynolds, Licensed Professional Land Surveyor, Stone Wall Boundaries, LLC.
 - Mr. Reynolds' pre-filed testimony will in part discuss the proposed photovoltaic electric generating facility's encroachment on certain real property located at 11 Glenwood Court, Bethany, Connecticut that is owned by the Rural Bethany Association.
5. Dominick Scaramuzzino, PhD, Rural Bethany Association.
 - Mr. Scaramuzzino's pre-filed testimony will in part discuss the extent to which the beehives and bees located at the subject property are not in compliance with state law and have adversely affected the right to the peaceful and quiet enjoyment of Mr. Scaramuzzino's property, which is located adjacent to the subject property.

B. Tentative List of Exhibits to be Offered

The Association intends to offer the following exhibits in support of its intervention petition:

1. Notice of Appearance and Petition for Intervenor Status, dated August 23, 2023.
2. Engineering report and plans prepared by Steven D. Trinkaus of Trinkaus Engineering, LLC, dated August 31, 2023.
3. Environmental report prepared by Sigrun. N. Gadwa, MS, of Carya Ecological Services, LLC.
4. Letter prepared by Richard Cogill, Fire Chief, Bethany Volunteer Fire Department.
5. Boundary and Topographic Map Lands of Sean A. & Margaret L. Foley, 11 Glenwood Court, Bethany Connecticut, dated June 25, 2009 and revised October 10, 2009, prepared by Stone Wall Boundaries, LLC.

6. Email from Dr. Victoria Lynn Smith, State Entomologist, Connecticut Agricultural Experiment Station, to Madison Chain, Legislative Aide to Senator Jorge Cabrera, 17th District, dated August 14, 2023.
7. Email chain involving Dr. Victoria Lynn Smith, State Entomologist, Connecticut Agricultural Experiment Station, and Dominick Scaramuzzino, member of the Rural Bethany Association, dated August 24, 2023.

The Association reserves the right to offer additional exhibits, pre-filed testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by TRITEC, the Council and any other parties and intervenors.

Respectfully Submitted,

RURAL BETHANY ASSOCIATION

By: 

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CERTIFICATION OF SERVICE

Pursuant to Conn. State Agency Regs § 16-50j-12, 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 5, 2023:

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