

STATE OF CONNECTICUT

SITING COUNCIL

TRITEC AMERICAS, LLC, NOTICE OF : PETITION NO. 1609  
ELECTION TO 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 250 :  
CARTER STREET, MANCHESTER, CONNECTICUT: :  
AND ASSOCIATED ELECTRICAL :  
INTERCONNECTION : April 24, 2024

**TRITEC AMERICAS, LLC’S OBJECTION TO RACHEL AND DANA SCHNABEL’S  
REQUEST FOR INTERVENOR STATUS**

TRITEC Americas, LLC (“TRITEC”) hereby objects to Rachel and Dana Schnabel’s Joint Request for Intervenor Status and requests that it be denied for the following reasons.

First, the request does not comply with the requirement set out in the Connecticut General Statutes (“C.G.S.”) that “the petition states *facts that demonstrate* that the petitioner’s participation is in the interests of justice...” C.G.S. §4-177a (b)(2) emphasis added. Likewise, the request does not comply with the requirements of Regulations of Connecticut State Agencies (“R.C.S.A”) that the petition state *facts that demonstrate the petitioner’s participation shall furnish assistance to the Council in resolving the issues in the proceeding...the relief sought...and the legal authority therefor...*” R.C.S.A. §16-50j-15(b) emphasis added. The Schnabels simply state that they live across the street from properties that abut the proposed facility.

Additionally, the Town of Manchester has sought to intervene in this proceeding. The Town states in its request to intervene that it represents the interests of Manchester residents. Therefore, if the Town is permitted to intervene, the Schnables' input will be repetitive and could impair the orderly conduct of proceedings. The Schnables could voice their concerns to the Town who in turn will represent them in this proceeding.

Lastly, one of the statutes that the Schnables give as authority for its intervention is C.G.S. §22a-120. This statutory section does not apply as it governs certification proceedings, and this is a proceeding on a petition for declaratory ruling.

Based on the foregoing, TRITEC requests that the Siting Council deny the Schnables' Request for Intervenor Status.

In the alternative, if the Siting Council were to grant the Schnables' request to intervene, TRITEC requests that the Council limit their participation to noise and visibility, as these are the only issues that they tied to their home's proximity to the site in their request for intervenor status.

RESPECTFULLY SUBMITTED,

**TRITEC Americas, LLC**



By: \_\_\_\_\_

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cc: Service List