

PAUL R. MICHAUD

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April 10, 2024

VIA ELECTRONIC MAIL

Melanie Bachman Executive Director Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: Petition No. 1609 - TRITEC Americas, LLC notice of 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. Pre-Hearing Submission.

Dear Attorney Bachman:

TRITEC Americas, LLC ("TRITEC") hereby provides the following pre-hearing information available at this time. We reserve the right to amend the information as this matter progresses.

I. List of Anticipated Witnesses and Pre-filed Written Testimony Subject Matter: 1

a. Davis Jolley, Vice President of Operations, TRITEC Americas, LLC

Subject Matter: Company, Town Government Outreach, Abutter
Outreach, Alternative Project Site Proposal, Compliance with Siting
Council Conditions, Site Leasing, Agrivoltaics, State Incentive Program,
Project Benefits, Decommissioning, Battery Storage System, ISO-Forward
Capacity Program, Solar Panel Selection, Interconnection Approval, Solar
Panel TCLP Testing, Connecticut Renewable Energy Policy.

¹ TRITEC intends to present its witnesses as a panel for cross-examination purposes.

b. Kevin Solli, PE, Principal, Solli Engineering, LLC

 Subject Matter: Civil Engineering; Stormwater Management; Environmental Effects and Mitigation Measures; Project Layout; Noise Analysis; CT DEEP General Stormwater Permit Requirements; Connecticut Soil Erosion and Sediment Control Guidelines; Connecticut Stormwater Quality Manual; US Army Corps of Engineers Requirements; Land Use Planning; Hydrology.

c. Cameron Hendry, Assistant Project Manager, Solli Engineering, LLC

 Subject Matter: Civil Engineering; Stormwater Management; Environmental Effects and Mitigation Measures; Project Layout; Noise Analysis; CT DEEP General Stormwater Permit Requirements; Connecticut Soil Erosion and Sediment Control Guidelines; Connecticut Stormwater Quality Manual; US Army Corps of Engineers Requirements; Land Use Planning; Hydrology.

d. Eric LaBatte, Director of Operations, Solli Engineering, LLC

 Subject Matter: Civil Engineering; Stormwater Management; Environmental Effects and Mitigation Measures; Project Layout; Noise Analysis; CT DEEP General Stormwater Permit Requirements; Connecticut Soil Erosion and Sediment Control Guidelines; Connecticut Stormwater Quality Manual; US Army Corps of Engineers Requirements; Land Use Planning; Hydrology.

e. Bill Kenny, Principal, William Kenny Associates

 Subject Matter: Wetlands; Watercourses; Wetland Delineations; US Army Corps of Engineers Wetland Determination Data Forms; Ecology; Soil Science; Geology; Natural Diversity Database.

f. Alexander Wojtkowiak, Soil Scientist, William Kenny Associates

i. Subject Matter: Wetlands; Watercourses; Wetland Delineations; US Army Corps of Engineers Wetland Determination Data Forms; Ecology; Soil Science; Geology; Natural Diversity Database.

g. Jackson Smith, Ecologist, William Kenny Associates

i. Subject Matter: Wetlands; Watercourses; Wetland Delineations; US Army Corps of Engineers Wetland Determination Data Forms; Ecology; Soil Science; Geology; Natural Diversity Database.

- h. Warren Horton, President/Member, Horton Electrical Services, LLC and Squirrel Enterprises, Inc.
 - Subject Matter: Site Clearing, Project Construction, Project Equipment, Transformer Noise, Project Operation and Maintenance, Project Decommissioning, Project Interconnection, Building Code, National Electric Code, Electric and Magnetic Field Solar Industry Best Practice, and Safety.
- II. List of Exhibits:

TRITEC intends to offer the Exhibits attached to TRITEC's Petition and any Exhibits that may be attached to pre-filed written testimony.

- III. Public Comment Session of Hearing Designated Joint Presenters:
 - a. Kevin Solli, PE, Principal, Solli Engineering, LLC
 - b. Cameron Hendry, Assistant Project Manager, Solli Engineering, LLC
 - c. Eric LaBatte, Director of Operations, Solli Engineering, LLC

Please feel free to contact me if you have any questions.

Very truly yours,

Paul R. Michaud

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Service List:

Ray Welnicki, 121 Amanda Dr., Manchester, CT 06040 Town of Manchester – John F. Sullivan, Assistant Town Attorney