

**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 25, 2024

**TRITEC AMERICAS, LLC’S REPLY TO THE TOWN OF MANCHESTER’S
RESPONSE TO TRITEC’S OBJECTIONS TO REQUESTS FOR PARTY AND
INTERVENOR STATUS**

TRITEC Americas, LLC (“TRITEC”) hereby responds to the Town of Manchester’s (“Town”) response to TRITEC’s objections to the request of Manchester Advocates for Responsible Solar Development’s (“MARSD”) Request for Intervenor Status in this matter. TRITEC vehemently objects to allowing both the Town of Manchester and MARSD to intervene in this proceeding for the following reasons.

First, the Town of Manchester has already sought to intervene in the proceeding, stating that it represents the interests of its residents.

Second, Like the Town of Manchester, MARSD also seeks to intervene in the proceeding, stating that it represents “the citizenry of Manchester.”

Third, Connecticut courts have firmly established that status as a party or intervenor must be grounded in specific personal and legal interests, not the general interest of all community members. This principle was upheld in Brouillard v. Conn. Siting Council, 52 Conn. Supp. 196,

*204; 2010 Conn. Super. LEXIS 2523, ***12 (J.D. of New Britain 2010) (aff'd 133 Conn. App. 851; 2012 Conn. App. LEXIS An 96). Allowing both the Town of Manchester and MARSD to intervene in this proceeding, given their shared interest in representing the community as a whole, could lead to unnecessary repetition and potentially disrupt the orderly conduct of proceedings. This concern is not unfounded, as TRITEC has already been inundated with over 400 overlapping interrogatories, effectively piling on TRITEC. The orderly conduct of this proceeding was further compromised when the Town, in its motion, inappropriately advised MARSD—as well as the other potential intervenor and party—to make changes to their original filings to address the deficiencies in their request.

Accordingly, TRITEC requests that the Council deny MARSD's request for intervenor status or, alternatively, deny the Town of Manchester's request for intervenor status—but not grant both.

RESPECTFULLY SUBMITTED,

TRITEC Americas, LLC



By: _____

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cc: Service List