

CONNECTICUT SITING COUNCIL

TRITEC AMERICAS, LLC, NOTICE OF ELECTION)
TO WAIVE EXCLUSION FROM 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)
ELECTRICAL INTERCONNECTION)

DOCKET NO. 1609

APRIL 25, 2024

**RESPONSE OF THE TOWN OF MANCHESTER TO TRITEC AMERICAS, LLC's
OBJECTIONS TO SCHNABEL AND MARDAC's REQUESTS FOR INTERVENOR'S
STATUS AND WELNICKI'S REQUEST FOR PARTY STATUS**

The Town of Manchester is in receipt of the Petitioner's Objections to the requests of Rachel Schnabel and MARDAC's for intervenor status and Raymond Delnicki's request for party status in this Petition for a Declaratory Ruling.

In those Objections, the Petitioner alleges that "The Town states in its request to intervene that it represents the interests of Manchester residents. Therefore, if the Town is permitted to intervene, Welnicki's input will be repetitive. Welnicki could voice his concern to the Town who in turn will represent him in this proceeding." Similar representations were made with respect to Schnabel and MARDAC as well.

To be clear, Manchester's stated interest is for its residents at large. The three other proposed party/intervenors, who reside in the area and who would be immediately affected by the proposed solar facility, have distinct concerns that are personal to them in addition to the general

concerns of Manchester's residents. They, rather than the Town of Manchester, can and are best suited to articulate those personal concerns.

There is no attorney-client relationship between the Town and the three proposed intervenor/parties.

Accordingly, the blanket statement made by the Petitioner that "Welnicki [or the others] could voice his [their] concerns to the Town who in turn will represent him [them] in this proceeding" is inapposite.

Furthermore, the undersigned notes that the Petitioner's Objections were filed at the eleventh hour, less than a day before the CSC will act on the requests to intervene and/or be granted party status. This leaves the neighbors no time to respond to the Objections.

To the extent that the Petitioner's Objections have any purchase, justice and fairness would dictate that the intervenors and parties be allowed to cure any of the alleged deficiencies.

RESPECTFULLY SUBMITTED
PROPOSED INTERVENING PARTY
THE TOWN OF MANCHESTER

BY /s/ John F. Sullivan (309787)

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CERTIFICATE OF SERVICE

This is to certify that on the above date a true copy of the foregoing has been sent electronically to the Service List dated January 24, 2024 and an additional fifteen paper copies have been submitted to the Connecticut Siting Council in accordance with its standing order.

/s/309787

John F. Sullivan
Commissioner of the Superior Court