



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: [siting.council@ct.gov](mailto:siting.council@ct.gov)

Web Site: [portal.ct.gov/csc](http://portal.ct.gov/csc)

VIA ELECTRONIC MAIL

November 21, 2024

Robert M. DeCrescenzo, Esq.  
Updike, Kelly & Spellacy, P.C.  
Goodwin Square  
225 Asylum Street, 20th Floor  
Hartford, CT 06103  
[rdecrescenzo@uks.com](mailto:rdecrescenzo@uks.com)

RE: **PETITION NO. 1637** – KCE CT 11, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4.99-megawatt AC battery energy storage facility and associated equipment located at 100 Salmon Brook Street, Granby, Connecticut, and associated electrical interconnection.  
**Council Interrogatories to the Town of Granby.**

Dear Attorney DeCrescenzo:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than December 3, 2024. Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto:siting.council@ct.gov). In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

**Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the December 3, 2024 deadline.**

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman  
Executive Director

MAB/IN

c: Service List dated August 29, 2024

Enclosure: Revised Schedule, dated November 21, 2024



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**REVISED SCHEDULE**

**PETITION NO. 1637** – KCE CT 11, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4.99-megawatt AC battery energy storage facility and associated equipment located at 100 Salmon Brook Street, Granby, Connecticut, and associated electrical interconnection.

Petition received	08/02/2024
<b>Council 60-day Action – Hold Public Hearing</b>	<b>08/29/2024</b>
Council Interrogatories	
• Set One Issued	10/25/2024
• Set One Responses due	11/12/2024
Pre-hearing conference via Zoom remote conferencing (11:00 a.m.)	10/23/2024
Deadline for Exchange of Interrogatories between Parties and Intervenor	11/05/2024
Deadline for State Agency Comments	11/12/2024
Deadline for Pre-filed testimony and responses to interrogatories	11/12/2024
Deadline to request Party/Intervenor status	11/12/2024
Public Hearing 2:00 p.m. evidentiary session and 6:30 p.m. public comment session via Zoom remote conferencing	11/19/2024
Council Interrogatories	
• Set-Two Issued to Petitioner and Set One Issued to Town	11/21/2024
• Petitioner and Town Responses Due	12/03/2024
Deadline for Late Filed Exhibits and Responses to Interrogatories	12/03/2024
<b>Continued Evidentiary Session 2:00 p.m. via Zoom remote conferencing</b> (refer to Hearing Information section on the Petition 1637 project webpage for Zoom remote conferencing log in/call in)	12/10/2024
Close of Evidentiary Record	TBD
Deadline for Party and Intervenor Post Hearing Briefs and Proposed Findings of Fact	TBD
Close of Public Comment Period	TBD
Draft Findings of Fact	TBD
Draft Findings of Fact, Opinion & Decision & Order	TBD
<b>Deadline for Final Decision</b>	<b>01/29/2025</b>

**Petition No. 1637  
KCE CT 11, LLC  
100 Salmon Brook Street, Granby, Connecticut**

**Interrogatories to Town of Granby  
November 21, 2024**

1. Referencing Exhibit D to Pre-filed Testimony of Mark Fiorentino, what Best Management Practices are generally employed in the design/operation of a proposal to minimize/eliminate threat to the Aquifer in the Protection Overlay Zone?
2. Referencing p. 6 of the Pre-filed Testimony of John Oates under Evacuation, what is the current Town of Granby emergency plan for evacuation and shelter for evacuees? Where is the shelter?
3. Referencing p. 7 of the Pre-filed Testimony of John Oates under Commentary on the applicant's Emergency Operations Plan and other documentation, is the driveway for the commercial plaza currently sized for emergency vehicles? From where would emergency vehicles access the plaza – the primary driveway or the secondary driveway to the west?
4. Referencing p. 1 of the Pre-filed Testimony of Kate Bednaz, submit a map identifying the location of the Monrovia agricultural field system, the associated dam, Sumatra Pond, Salmon Brook and the Farmington River, as well as the location of the federal designations of the Salmon Brook and the Farmington Rivers as Wild and Scenic Rivers.
5. What size are the current Town of Granby fire trucks? Are they able to maneuver into the commercial plaza in the event of emergency? Please provide the maximum length of fire hose available on the trucks.
6. Provide a copy of the Department of Public Health map of private wells in the vicinity of the proposed BESF site.
7. Where do the stormwater catch basins within the commercial plaza discharge?