



Robert M. DeCrescenzo
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November 12, 2024

VIA COURIER
VIA EMAIL:

Siting.council@ct.gov
Melanie.Bachman@ct.gov

Ms. Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06501

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. **Prehearing Submission.**

Dear Ms. Bachman:

This office represents the Town Granby (“Town”). On behalf of the Town, I have enclosed the following: **Prehearing Submission**. I have enclosed an original and fifteen (15) copies.

Please do not hesitate to contact me with any questions.

Very truly yours,

Robert M. DeCrescenzo, Esq.
Town Attorney

Enclosures

CERTIFICATION

This is to certify that on this day that the forgoing was delivered by electronic mail in accordance with RCSA §16-50j-12, to all parties and intervenors of record as follows:

Lee D. Hoffman Pullman & Comley, LLC 90 State House Square Hartford, CT 06103-3702 lhoffman@pullcom.com	Paul Williamson Sr. Manager, Development Key Capture Energy 25 Monroe Street Suite 300 Albany, NY 12210 paul.williamson@keycaptureenergy.com
Susan K. Okie Horses and Hounds, LLC 15 Mill Pond Drive Granby, CT 06035 sue@horsesandhounds.com	James C. Larwood 8 Roberts Road Simsbury, CT 06070 Jlproperty5@gmail.com
David J. Bostic 33 Mechanic Street Windsor, CT 06095 david.bosticpt@ctpts.com	



ROBERT M. DECRESCENZO, ESQ.

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

KCE CT 11, LLC PETITION FOR A	:	PETITION NO. 1637
DECLARATORY RULING 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	:	November 12, 2024

APPLICANT’S PREHEARING SUBMISSION

In accordance with § 16-50j-22a of the Regulations of Connecticut State Agencies, the Town of Granby (“Town”) respectfully files this Prehearing Submission concerning the above-captioned Petition filed by KCE CT 11, LLC (“KCE”) pending before the Connecticut Siting Council (“Council”).

A. Witness List

1. Mark Fiorentino, First Selectman;
2. Kate Bednaz, Town of Granby’s Wetlands Agent
3. Mark A. Gottlieb, LEP, Senior Environmental Consultant for GeoQuest, Inc.; and
4. John Oates, MS, EFO.

B. Exhibit List

1. Prefiled Testimony of Mark Fiorentino, which is appended hereto as Attachment A;
2. Prefiled Testimony of Kate Bednaz, which is appended hereto as Attachment B;
3. Prefiled Testimony of Mark A Gottlieb, which is appended hereto as Attachment C;

4. Prefiled Testimony and resume of John Oates, which is appended hereto as Attachment D;

The Town reserves the right to offer additional exhibits, as necessary, including for purposes of rebuttal.

C. Items to be Noticed Administratively

The Town does not wish to notice any items administratively at this time.

D. Direct Testimony

At the hearing, the Town intends to adopt the aforementioned exhibits as its direct testimony and thereafter make its representatives available for cross-examination and re-direct examination. The Town respectfully reserves the right to offer additional exhibits, witnesses, testimony and administratively noticed materials as may be necessary during the course of the proceedings, including for purposes of rebuttal.

Respectfully submitted by,

TOWN OF GRANBY,



By: _____

ROBERT M. DECRESCENZO, ESQ.
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Hartford, CT 06103
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CERTIFICATION OF SERVICE

This is to certify that on this day that the forgoing was delivered by electronic mail in accordance with RCSA §16-50j-12, to service list for Petition No. 1637, all parties and intervenors of record as follows:

Lee D. Hoffman Pullman & Comley, LLC 90 State House Square Hartford, CT 06103-3702 lhoffman@pullcom.com	Paul Williamson Sr. Manager, Development Key Capture Energy 25 Monroe Street Suite 300 Albany, NY 12210 paul.williamson@keycaptureenergy.com
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