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December 30, 2025

VIA ELECTRONIC MAIL

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

Re: Petition 1688 – Greenskies Clean Energy 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 1.2-megawatt AC solar photovoltaic electric generating facility located at 81 and 93 Lake Street in Manchester, Connecticut

Dear Ms. Bachman:

I am writing on behalf of my client, Greenskies Clean Energy LLC (the “Petitioner”), in connection with the above-referenced Petition. On December 19, 2025, the Connecticut Siting Council (“Council”) issued a Close of Record Memorandum and Request for Extension of Time to Render a Final Decision, in which it requested the Petitioner’s consent to extend the date for a final decision on this petition to April 6, 2026. The Petitioner hereby agrees to this Council-requested extension of time.

In addition to the extension of the date for final decision, there is an additional matter to address for this Petition. On December 16, 2025, Ms. Laurie Robinson requested to speak during the evening public comment session scheduled for December 18, 2025. The next day, Ms. Robinson also moved to intervene less than 24 hours before the hearing scheduled in the above-referenced proceeding. At that December 18, 2025 evidentiary hearing, after allowing the Petitioner to provide comment on the request, the Council denied the untimely request to intervene. On December 20 and 22, 2025, Ms. Robinson requested reconsideration of the denial of intervenor status.

The Petitioner hereby reiterates its objection to Ms. Robinson’s untimely motion for intervenor status, and reconsideration thereof. As explained at the December 18, 2025 evidentiary hearing, Connecticut General Statutes (“Conn. Gen. Stat.”) § 4-177a(b) permits the Council to grant intervenor status if (1) such person has submitted a written petition to the agency and mailed copies to all parties, at least five days before the date of hearing; and (2) that petition states facts that demonstrate that the petitioner’s participation is in the interests of justice and will not impair the orderly conduct of the proceedings. Ms. Robinson’s continued attempts to participate both as a member of the public and an intervenor in this proceeding have the potential to impair the orderly conduct of this matter.

As discussed at the December 18, 2025 evidentiary hearing, Ms. Robinson was provided notice of the development of the instant project multiple times well in advance of the hearing date. First, she was

provided with informal notice via a letter from the Petitioner on April 16, 2025.¹ Thereafter, Ms. Robinson was sent a formal pre-filing notice on August 15, 2025.² She never signed for the certified mail of this notice, and it was returned. In response to a request from the Town of Manchester for a public hearing, the Council voted to hold a public hearing on October 2, 2025, and noticed the same on October 17, 2025.³ In accordance with the Council's procedures, Greenskies posted a sign on the subject property on December 8, 2025.⁴

On December 18, 2025, after consideration of the Petitioner's arguments against her motion, the Council denied Ms. Robinson's motion to intervene. The Council informed Ms. Robinson that she could not participate both as an intervenor and provide comments at the public comment hearing.⁵ After her initial motion to intervene was denied, Ms. Robinson provided public comments and nevertheless filed a request for reconsideration of her motion to intervene.

Conn. Gen. Stat. Sec. 4-181a(a) provides an opportunity for reconsideration on the grounds of: (A) An error of fact or law should be corrected; (B) new evidence has been discovered which materially affects the merits of the case and which for good reasons was not presented in the agency proceeding; or (C) other good cause for reconsideration has been shown. Ms. Robinson continues to show disregard for the Council's process and procedures by attempting to participate both as an intervenor and providing public comment. Moreover, she has not shown new evidence as to why her petition for reconsideration was improperly denied in the first instance, nor has she provided any good cause for such reconsideration. Accordingly, the Petitioner reiterates its objection to Ms. Robinson's request for reconsideration and respectfully submits that the Council should affirm its previous ruling.

Should you have any questions concerning this submittal, please contact me or Kate Boucher of this office at your convenience.

Sincerely,



Lee D. Hoffman

cc: Petition 1688 Service List, Laurierobinson119@gmail.com

¹ See Petition Appendix M – Public Outreach at Page 12.

² See Petition Appendix M – Public Outreach at Pages 44-45.

³ In the October 17 hearing notice, the Council directed any person seeking to be named or admitted as a party or intervenor to file a written request on or before December 11, 2025.

⁴ See Petitioner's Sign Posting Affidavit dated December 8, 2025.

⁵ See Council Acknowledgement of Request for Intervenor Status ("On December 16, 2025, the Council acknowledged your request to speak at the 6:30 PM public comment session of the public hearing scheduled for December 18, 2025. If your December 17, 2025 Request for Intervenor status is granted, please be advised that parties and intervenors, including their representatives and witnesses, are not allowed to participate in the public comment session") (December 17, 2025); *see also* Council procedural correspondence to Ms. Robinson ("If your request for intervenor status is granted, you may not also participate in the 6:30 PM public comment session. That session is reserved for members of the public who are not parties, intervenors and/or witnesses for a party or intervenor to make brief statements into the record") (December 18, 2025); *see also* Council acknowledgement of Request for Reconsideration ("You were also advised that if your request for intervenor status was granted during the afternoon evidentiary session, you could also not participate in the evening public comment session") (December 23, 2025).