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VIA ELECTRONIC MAIL

Date: December 24, 2025

Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
Melanie.bachman@ct.gov | siting.council@ct.gov

RE: PETITION NO. 1699 – SMS CT MG02A, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 1.93-megawatt AC battery energy storage facility and associated equipment to be located at Guilford High School, 605 New England Road, Guilford, Connecticut.

Subject: Supplemental Submission – Response to Council on Environmental Quality (CEQ) Comments

Dear Attorney Bachman,

On behalf of the Petitioner, SMS CT MG02A, LLC, we respectfully submit the enclosed supplemental memorandum prepared by Cavanaugh Tocci, dated December 22, 2025. This technical response addresses the concerns raised by the Council on Environmental Quality (CEQ) in their correspondence dated December 18, 2025, regarding the noise analysis for the proposed facility.

The attached technical response clarifies that the Petitioner's noise analysis utilized the most conservative state standards to ensure compliance, regardless of existing ambient background noise levels.

Furthermore, the Petitioner commits to conducting a post-construction operational noise study, as recommended by the CEQ. This study will be undertaken once the facility is fully operational to verify that actual sound levels remain in strict compliance with the State of Connecticut's noise standards.

We believe this supplemental information addresses the CEQ's comments. Please feel free to contact us should the Council require any further clarification.

Respectfully,

Signed by:
Kristel Watson
DF479ACBB5FC419...

Kristel Watson
kwatson@scalemicrogrids.com
Chief Commercial Officer, Scale Microgrid Solutions Operating, LLC

Enclosure: *Cavanaugh Tocci Response to CEQ Comment, dated December 22, 2025*

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MEMORANDUM

DATE: December 22, 2025

FROM: Bradley M. Dunkin, Associate Principal Consultant

TO: Karen Jenkins, Scale Microgrids

CC: Chris Lobdell, Purepoint Energy

SUBJECT: Petition 1699 – Battery Energy Storage Facility, Guilford CT
Response to Council on Environmental Quality Comment

I have reviewed the comment submitted to the Connecticut Siting Council by Paul Aresta, Executive Director of the State of Connecticut Council on Environmental Quality, regarding Petition 1699 for construction of a battery electric storage facility (BESS) at Guilford High School, Guilford CT. The comment notes public concerns of noise from the facility, and recommends "that the Petitioner confirm if the noise generated by the proposed facility, in combination with existing noise emitters at the proposed site, will comply with the applicable standards".

In support of this recommendation, the comment cites Regulations of Connecticut State Agencies (RCSA) Section 22a-69-3.6. This section reads, in full:

> In those individual cases where the background noise levels caused by sources not subject to these Regulations exceed the standards contained herein, a source shall be considered to cause excessive noise if the noise emitted by such source exceeds the background noise level by 5 dBA, provided that no source subject to the provisions of Section 3 shall emit noise in excess of 80 dBA at any time, and provided that this Section does not decrease the permissible levels of the other Sections of this Regulation.

This section of RCSA follows 22a-69-3.5, which specifies fixed sound level limits. 22a-69-3.6 applies only when the existing background sound level exceeds these fixed limits. In such cases, a new sound source would be subject to limits *higher* than the fixed limits. For example, if the applicable fixed limit is 45 dBA, but the background sound level is 50 dBA, then the project sound would be limited to 55 dBA rather than 45 dBA.

Based on our experience of similar environments, we have made the assumption that the background sound level does not exceed the fixed limits, and consequently we did not investigate the sound of the proposed facility in combination with existing noise emitters. In doing so, we have based our analysis on the most conservative applicable standards, rather than the more lenient standards that would apply if the existing background sound level exceeds fixed limits.

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