STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
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VIA ELECTRONIC MAIL

January 14, 2026

TO: Service List, dated December 8, 2025

FROM: Melanie Bachman, Executive Director MAB

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, and associated electrical interconnection.

Comments have been received from the Connecticut Department of Energy & Environmental Protection on January 14, 2026. A copy of the comments is attached for your review.

MAB/MP/dll

c: Council Members
CGS §16-50j(i) State Agency Comment List (via electronic mail)

January 14, 2026

Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: 1.93 MW Battery Storage Facility
Guilford High School 605 New England Road, Guilford CT
SMS CT MG02A LLC
Petition No. 1699

Dear Members of the Connecticut Siting Council:

Staff of the Department of Energy and Environmental Protection (DEEP) Office of Environmental Review & Strategic Initiatives (ERSI) have reviewed the above-referenced petition by SMS, a subsidiary of Scale Microgrid Solutions, LLC.

Staff are providing comments to discuss areas within DEEP's jurisdiction as they relate to the proposed project. DEEP staff may also include observations or discuss potential noise and visual impacts that can be avoided or mitigated through project planning. Staff conduct site visits as part of the analysis to observe site characteristics that may not be captured in project plans.

Public Act 21-53, "An Act Concerning Energy Storage," established a statewide goal to deploy 1,000 MW of energy storage in Connecticut by the end of 2030. It requires the Public Utilities Regulatory Authority (PURA) to develop programs for customer-side and grid-side energy storage systems connected to the electric distribution system and enables DEEP to issue requests for proposals for energy storage systems paired with renewable energy sources and stand-alone energy storage systems connected to the electric transmission or distribution system.

On July 28, 2021, PURA developed a nine-year electric storage program, the Energy Storage Solutions (ESS) Program, that is administered by the Connecticut Green Bank, Eversource and the United Illuminating Company (UI). It offers performance incentive payments to residential, commercial, and industrial customers who host on-site battery energy storage systems that serves on-site load (paired or standalone) behind a customer meter.

Summary of Key Findings

The following are the key findings presented in this letter.

- Staff visited the site December 19, 2025, and observed the proposed BESS location.
- The distance between the perimeter fence and closest residential property line is approximately 120 feet.

- The project consists of one Tesla Megapack 2XL battery storage unit, an Eversource owned transformer on a concrete pad, and inverters.
- No DEEP permits are required.
- DEEP anticipates visual impacts while campus is in use.
- Petition states emergency plans will include the Fire Marshal and Fire Department in Guilford.
- DEEP anticipates noise could be a factor in this project, noted in the Noise section below.
- DEEP recommends creating distance between usable walking paths and the facility and facilitating an emergency action plan prior to CSC approval.

Site Information

Project Description

The proposed facility is on approximately 2,000 square feet (0.046 acres) in front of Guilford High School on the northeast side of the school. The school has an existing 325KW rooftop solar array and an existing backup generator. The facility is set to be on maintained lawn adjacent to a walking path that connects the front of the high school to a side parking lot and the tennis courts. The lawn is partially raised with mounds and sharply drops downhill to the existing generator facility. The facility will be enclosed on four sides by a 7 ft. high chain link fence. A 17-foot-long sound barrier wall is also proposed for the south side of the facility, rising 5 ft. above the top of the BESS. The project is adjacent to the bus drop-off, school parking lot, and a walking path connecting the school to the lot and tennis courts.

Site Visit

ERSI staff visited the site with permission from the project manager on December 19, 2025. The site is adjacent to a student walking path leading to parking lots and the tennis courts. The proposed location has large, raised mounds that indicate fill material in those areas. The proposed location is in full view of the bus entrance and for students walking between the parking lot and front entrance. Staff observed that the existing generator facility is downgradient of the proposed BESS. Additional site work involving grading may be required for the steep slope to the generator facility. The petition notes that the closest residential property is 153 feet to the east from the facility but does not indicate the distance to the property line, which is approximately 120 feet. The grounds of the high school make up the remaining surrounding property to this project site. A map from the Town of Guilford's GIS system indicates the approximate location of the BESS and closest property line. The map includes contour lines. The site requires grading, which is not indicated in the site plan included in the petition as Exhibit A.

DEEP's Divisions/ Programs

Stormwater Management

Sites less than an acre in disturbance do not require DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities.

Natural Diversity Data Base

The Project Site is not located in a Natural Diversity Data Base area.

Wetlands and Vernal Pools

There are no wetlands or watercourses on the project site.

Visual Impacts

The proposed site is visible to students and families utilizing the high school campus. Plans indicate a proposed 7 ft. chain link fence surrounding the facility and a 17 ft. long sound wall on the south side of the BESS rising 5 ft. above the top of the BESS. DEEP staff recommend relocating the walking path to put distance between student walking areas and the chain link fence and adding landscaping/screening to further hide the facility from view. DEEP staff note that the range of ages in high school are from 13 to 18, and protection measures likely need to be in place against potential vandalism or a system failure.

Noise Impacts

As stated in the petition, a sound wall is proposed for the south side of the facility. The summary included in the petition states that the closest residence is 153 ft. from the facility and determined noise levels for that distance. DEEP notes that a resident should be able to utilize their outdoor property and suggests that noise be evaluated to the property line instead of to the residence. The sound study does not indicate if noise levels were tested at the tennis courts or other locations where students recreate.

Thank you for the opportunity to review this application and to submit these comments to the Connecticut Siting Council. DEEP's comments are based on information available for review as of the date of this letter, which may not fully apply if elements of this petition are modified through the Siting Council's administrative review process. Since this petition may be modified, these comments should not be considered to be a final endorsement or rejection for the public record.

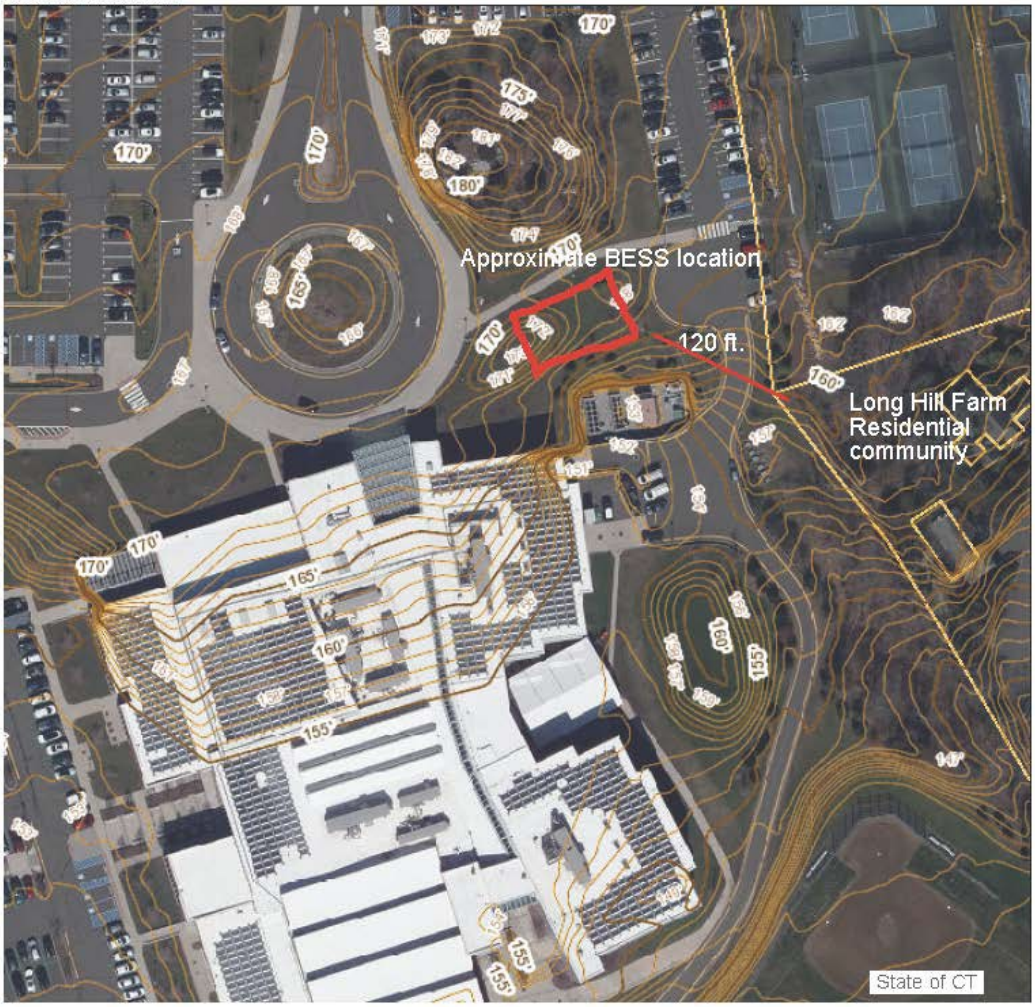
Respectfully yours,

Linda Brunza
Environmental Analyst 3

Town of Guilford

Geographic Information System (GIS)

Date Printed: 1/5/2026



MAP DISCLAIMER - NOTICE OF LIABILITY

This map is for assessment purposes only. It is not for legal description or conveyances. All information is subject to verification by any user. The Town of Guilford and its mapping contractors assume no legal responsibility for the information contained herein.

Approximate Scale: 1 inch = 100 feet

0 100 Feet

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