

Paul R. Michaud

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September 19, 2024

SENT BY E-MAIL

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

Re:

Petition No. 1609 – TRITEC Americas, LLC notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes § 16-50k(e), and petition for a declaratory ruling, pursuant to Connecticut General Statutes § 4-176 and § 16-50k, for the proposed construction, maintenance and operation of a 0.999-megawatt AC solar photovoltaic electric generating facility located at 250 Carter Street, Manchester, Connecticut, and associated electrical interconnection. **Post-Hearing Brief**

Dear Attorney Bachman:

After the evidentiary record in this matter was closed by the Siting Council on August 27, 2024, the Siting Council issued a Memorandum directing the parties and intervenors that they may file briefs and proposed findings of fact with the Council. The Council expressly stated that "no new information, no new evidence, no argument, and no reply briefs will be considered without permission from the Council." The Petitioner is hereby filing its Post-Hearing Brief in accordance with the Council's above-stated directions.

However, some parties and intervenors, most notably the Town of Manchester who is represented by an attorney, has submitted briefs with argument, and raises new arguments that were never previously raised or on the record—all without permission from the Council, and in flagrant disregard of the Council's authority and at the expense of Petitioner's right to a fair process. Therefore, Petitioner requests that the Council strike or disregard those portions of briefs that do not conform to the Council's explicit instructions. Alternatively, Petitioner's counsel requests that it be given additional time to file a rebuttal brief.

Very Sincerely,

Paul R. Michaud

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cc: Service List: