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**MURTHA
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ATTORNEYS AT LAW

March 15, 2019

**VIA ELECTRONIC MAIL
AND FIRST CLASS MAIL**

Mr. James J. Murphy, Vice-Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Petition No. 1354 – Chatfield Solar Fund, 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 1.98-megawatt AC solar photovoltaic electric generating facility located in Killingworth, Connecticut

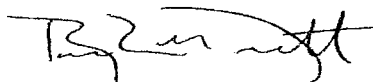
Dear Vice-Chairman Murphy:

Enclosed please find the original and fifteen (15) copies of Chatfield Solar Fund's objection to KARS interrogatories in connection with the above-described petition.

I certify that a copy hereof has been furnished on this date via electronic mail and/or first class mail, postage prepaid, to all parties, intervenors and participants of record for this petition as of this date.

Please feel free to contact me with any questions concerning this submittal at (203) 772-7787.

Very truly yours,



Bruce L. McDermott

Enclosures

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CONNECTICUT + MASSACHUSETTS + NEW YORK

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**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

Chatfield Solar Fund, 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 1.98-megawatt AC solar photovoltaic electric generating facility on approximately 25 acres located generally south of Route 80 (North Branford Road) and east of Chestnut Hill Road in Killingworth, Connecticut, and associated electrical interconnection to Eversource Energy's Green Hill Substation located at 775 Green Hill Road, Madison, Connecticut.

Petition No. 1354

March 15, 2019

OBJECTION OF CHATFIELD SOLAR FUND, LLC TO KARS INTERROGATORIES

The petitioner, Chatfield Solar Fund, LLC ("Chatfield") respectfully submits this objection to interrogatories from Killingworth Advocates for Responsible Solar ("KARS") provided to the Connecticut Siting Council's (the "Council") Executive Director, Melanie Bachman, on March 13, 2019. The interrogatories were not timely served upon Chatfield and to date, have not been served upon Chatfield. In support of its objection Chatfield states the following:

1. KARS was granted party status in the proceeding at the Council's February 21, 2019 hearing. 2/21/19 Tr. at 9.
2. On February 25, 2019, Chatfield and KARS were provided a revised schedule for the petition, which included a deadline for filing interrogatories upon each other. This deadline was March 12, 2019. Attachment A.
3. On March 13, 2019, after the established deadline for the exchange of interrogatories between parties, KARS provided the Council with 12 interrogatories by

electronic mail. Attachment B. The interrogatories were provided to Chatfield by the Council's Executive Director. *Id.* To date, the interrogatories have not been properly served upon Chatfield by KARS.

4. Upon information and belief, the Siting Council through its Executive Director has informed KARS of the existence of the "Connecticut Siting Council Information Guide to Party and Intervenor Status" (the "Guide") by providing KARS with a link to the Guide. The Guide provides the following concerning the Council's service requirements: "The Council, parties and intervenors must send a copy of any document filed in a docket to every person on the service list ..." To date, KARS has not provided Chatfield with its interrogatories. Moreover, counsel for Chatfield asked KARS to provide Chatfield with copies of all filings by KARS with the Council (Attachment C) - to date KARS has refused to do so.

Therefore, in light of KARS' disregard for the Council's established schedule and service list requirements, Chatfield objects to KARS untimely and improperly serviced interrogatories dated March 13, 2019.

Respectfully submitted,
Chatfield Solar Fund, LLC

By: 

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CERTIFICATION

This is to certify that on this 15th day of March, 2019, a copy of the foregoing has been electronically delivered to all other known parties and intervenors.

A handwritten signature in black ink, appearing to read "Bruce L. McDermott", written in a cursive style.

Bruce L. McDermott

ATTACHMENT A



STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: www.ct.gov/csc

SCHEDULE

PETITION NO. 1354 – Chatfield Solar Fund, 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 1.98-megawatt AC solar photovoltaic electric generating facility on approximately 25 acres located generally south of Route 80 (North Branford Road) and east of Chestnut Hill Road in Killingworth, Connecticut, and associated electrical interconnection to Eversource Energy's Green Hill Substation located at 775 Green Hill Road, Madison, Connecticut.

Petition Received	10/23/2018
Council Interrogatories	
• Set-One issued	11/21/2018
• Set-One responses due (w/Council extension)	01/02/2019
• Set-Two issued	01/16/2019
• Set-Two responses due	02/06/2019
• Set-Three issued	02/26/2019
• Set-Three responses due	03/19/2019
Comment Period Deadline	11/26/2018
Comment Period Deadline (w/Council extension)	12/17/2018
Council 60-day Action – Hold Public Hearing	12/06/2018
Deadline for Action	12/22/2018
Pre-hearing conference 11:00 a.m.	01/30/2019
Deadline for filing of Interrogatories between Participants	02/07/2019
Pre-filed testimony and responses to interrogatories due	02/14/2019
Deadline to request Party/Intervenor status	02/14/2019
Field review (2:00 p.m.)	02/21/2019
Hearing (3:00 p.m. and 6:30 p.m. in Killingworth)	02/21/2019
Final Deadline for filing of Interrogatories between Participants	03/12/2019
Final Deadline for Pre-filed testimony, late filed exhibits, and responses to interrogatories	03/19/2019
Continued Public Hearing Session (1:00 p.m. in New Britain)	03/26/2019
Close of Evidentiary Record	03/26/2019
Close of Public Comment Record	04/25/2019
Draft Findings of Fact	04/25/2019
Draft Findings of Fact, Opinion & Decision & Order	05/09/2019
Deadline for Decision	04/21/2019

Siting Analyst: Robert Mercier

Revised 2/25/2019

ATTACHMENT B

From: "Lorinne Sekban" <killingworthforesponsiblesolar@gmail.com>

Date: Wed, Mar 13, 2019 at 3:55 PM -0400

Subject: Re: Speaker List & Question(s)

To: "Bachman, Melanie" <Melanie.Bachman@ct.gov>

Thanks for the update Melanie,

Do you think that KARS will be allowed any time for cross examination on 3/26? If so, do you know about how long we will be allowed this? Also, we did not receive answers to our first set of questions from February 14th, after the exclusions (not applicable) were submitted back to us. While there were quite a few questions that were not applicable, there were still some questions on our original list that were applicable. And my final question is - when is our list of Witnesses due by?

Thank you again. Here is our list of interrogatories below:

1. What is the name and address of your agent for service of process?
2. Describe the site selection process, including the criteria used.
3. How and why was the decision made to petition for a declaratory ruling, rather than an application?
4. Have you received any financial assistance from Connecticut's Green Bank or any of its subsidiaries and related entities? If so, what is the nature and amount of such assistance?
5. Have you received any direct or indirect funding or loans, subsidized in whole or part, by the U.S. Department of Energy? If so, what is the nature and amount of such assistance?
6. List all federal and state tax credits, tax exemptions, production credits, grants, loans, loan guarantees and other financial assistance you have received or will receive

over the life of this project, and the dollar amounts and/or percentages and/or interest rates of these.

7. What will be the cost basis for local property tax calculations?
8. What procedures will the installation contractor be required to perform to prevent panel damage during installation and how will this be monitored?
9. What is the individual cost per panel for recycling?
10. Does the panel manufacturer offer to recycle its panels at decommissioning?
11. Please provide a copy of the manufacturer's warranty.
12. How will the decommissioning date be determined? List and explain the criteria used to make this decision.

ATTACHMENT C

Bruce McDermott

From: Bruce McDermott
Sent: Wednesday, February 20, 2019 10:45 AM
To: 'killingworthforesposablesolar@gmail.com'
Cc: 'Bachman, Melanie'
Subject: Petition 1354

Dear Ms. Sekban: Melanie Bachman has been kind enough to forward me your various correspondence to the Council concerning Petition 1354. By this email I request that you copy me on all filings you make with and correspondence you have with the Council concerning the merits of the Petition. There is no need to provide me with hard copies but rather I wish only to receive electronic copies.