



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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VIA ELECTRONIC MAIL

April 11, 2019

Daniel E. Casagrande, Esq.
Cramer & Anderson LLP
30 Main Street, Suite 204
Danbury, CT 06810

RE: **PETITION NO. 1312** – Candlewood Solar LLC Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 20 megawatt AC (26.5 megawatt DC) solar photovoltaic electric generating facility located on a 163 acre parcel at 197 Candlewood Mountain Road and associated electrical interconnection to Eversource Energy's Rocky River Substation on Kent Road in New Milford, Connecticut. **Court-ordered remand regarding visibility.**

Dear Attorney Casagrande:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 25, 2019. To help expedite the Council's review, please file individual responses as soon as they are available.

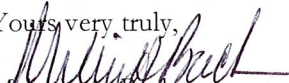
Please forward an original and 15 copies to this office, as well as a copy via electronic mail. In accordance with the State Solid Waste Management Plan, the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the April 25, 2019 deadline.

Copies of your responses shall be provided to all parties and intervenors listed on the service list, which can be found on the Council's pending matters website.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Yours very truly,


Melanie A. Bachman
Executive Director

MB/MP/lf

c: Council Members
Parties and Intervenors

**Petition No. 1312 – Court-ordered Remand Regarding Visibility
Interrogatories to RCM
Set One
April 11, 2019**

1. Provide copies of the following map and photographic exhibits on the Exhibit List dated December 4, 2018 (copy attached) from the Superior Court record in Docket No. CV-18-6042335-S:
 - a. Exhibit 5 (Proposed Conditions Map – Figure 12 (Labeled));
 - b. Exhibit 7 (Ostrove and Dunham Property Map);
 - c. Exhibit 9a-d (Photos – Dunham Property);
 - d. Exhibit 14 (Photo Looking at Candlelight Farms);
 - e. Exhibit 20 (Photos – Ostrove Property);
 - f. Exhibit 22 (Photos – Miscellaneous Candlewood Mountain Road); and
 - g. Exhibit 23 (Photos).

2. Please submit a map of the photo locations identified in the exhibits in question #1 above and the direction in which the photos were taken (ex. To the southeast).

LIST OF EXHIBITS

JD-CL-28 Rev. 6-16

STATE OF CONNECTICUT
SUPERIOR COURT

LISTEXH

Type of Proceeding: **Civil - Administrative Appeal**

Date(s) of Proceeding: **December 4, 2018**

Court	<input checked="" type="checkbox"/> Geographic Area number 15	<input type="checkbox"/> Judicial District of: New Britain	<input type="checkbox"/> Housing Session	At (Town) New Britain
Name of case Rescue Candlewood Mountain, et al. v. CT Siting Council, et al.			Name(s) of Clerk(s)	
Name of Judge		Name(s) of court reporter(s)		Docket number HHB-CV-18-6042335-S

Plaintiff's Exhibits		Entered as Full or ID	Defendant's Exhibits		Entered as Full or ID
<input checked="" type="checkbox"/> ID	1. Certified Zoning Map	12/4/18	<input checked="" type="checkbox"/> ID	A. Map	1/8/19
<input checked="" type="checkbox"/> Full			<input checked="" type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	2. Portion of Zoning Map	12/4/18	<input checked="" type="checkbox"/> ID	B. View Point #3	1/8/19
<input checked="" type="checkbox"/> Full			<input checked="" type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	3. Colored Zoning Map	12/4/18	<input checked="" type="checkbox"/> ID	C. View Point #6	1/8/19
<input checked="" type="checkbox"/> Full			<input checked="" type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	4. Proposed Conditions Map-Figure 12	12/4/18	<input checked="" type="checkbox"/> ID	D. Location Map	1/8/19
<input checked="" type="checkbox"/> Full			<input checked="" type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	5. Proposed Conditions Map-Figure 12 (Labeled)	12/4/18	<input checked="" type="checkbox"/> ID	E. Location Map	1/8/19
<input checked="" type="checkbox"/> Full			<input checked="" type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	6. Google Map	12/4/18	<input checked="" type="checkbox"/> ID	F. Letter dated 12/4/17	1/8/19
<input checked="" type="checkbox"/> Full			<input checked="" type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	7. Ostrove and Dunham Property Map	2/4/18	<input type="checkbox"/> ID	G.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	8. Deed-195 Candlewood Mountain Road	12/4/18	<input type="checkbox"/> ID	H.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	9. Photos - Dunham Property ^{AC} _{SD}	12/4/18	<input type="checkbox"/> ID	I.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	10. Deed (1974)-214 Candlewood Mountain Road	12/4/18	<input type="checkbox"/> ID	J.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	11. Deed-214 Candlewood Mountain Road	12/4/18	<input type="checkbox"/> ID	K.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	12. Brochures	12/4/18	<input type="checkbox"/> ID	L.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	13. Candlelight Farms Inn - Website	12/4/18	<input type="checkbox"/> ID	M.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	14. Photo Looking at Candlelight Farms	12/4/18	<input type="checkbox"/> ID	N.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	15. Deed-5 Green Pond Road	1/8/19	<input type="checkbox"/> ID	O.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	16. Flight Pattern	1/8/19	<input type="checkbox"/> ID	P.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	17. CAA 3/16/18 Letter _{Full}	1/8/19	<input type="checkbox"/> ID	Q.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	18. Zoning Commission 9/11/17 Letter	1/8/19	<input type="checkbox"/> ID	R.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	19. Deed-175 Candlewood Mountain Road	1/8/19	<input type="checkbox"/> ID	S.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	20. Photos - Ostrove Property	1/8/19	<input type="checkbox"/> ID	T.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	21. Posthauer 9/18/17 Letter		<input type="checkbox"/> ID	U.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	22. Photos - Miscellaneous Candlewood Mountain Road	1/8/19	<input type="checkbox"/> ID	V.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	23. Photos	1/8/19	<input type="checkbox"/> ID	W.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	24. Letter to FAA	1/8/19	<input type="checkbox"/> ID	X.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input checked="" type="checkbox"/> ID	25. FAA Response	1/8/19	<input type="checkbox"/> ID	Y.	
<input checked="" type="checkbox"/> Full			<input type="checkbox"/> Full		
<input type="checkbox"/> ID	26.		<input type="checkbox"/> ID	Z.	
<input type="checkbox"/> Full			<input type="checkbox"/> Full		

Plaintiff's exhibits returned to	Date	Defendant's exhibits returned to	Date
Receipt acknowledged (Attorney for Plaintiff)	Date	Receipt acknowledged (Attorney for Defendant)	Date

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