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January 28, 2020

Via Electronic Mail and First Class Mail

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

RE: ***Petition No. 1310A*** – Quinebaug Solar, 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 50 megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b)

Dear Ms. Bachman:

On behalf of the petitioner, Quinebaug Solar, LLC, enclosed please find an original and 15 copies of the Petitioner's Responses to Mr. Sposato's First Set of Interrogatories issued in the above-referenced proceeding.

Mr. Sposato did not attend the January 14, 2020 Field Visit and Hearing. The Connecticut Uniform Administrative Procedure Act requires that in a contested case, each party and the agency conducting the proceeding shall be afforded the opportunity at a hearing, to respond, to cross-examine other parties, intervenors, and witnesses, and to present evidence and argument on all issues involved.¹ It is regrettable that Mr. Sposato's unsupported assertions are unable to be fully subject to the Siting Council's due process and procedures for such testimony.

Please feel free to contact David Bogan of this office (860-541-7711) or me if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Kate Boucher".

Kathryn E. Boucher

Enclosures

¹ Connecticut General Statutes § 4-177c(a).

Petition No. 1310A
Sposato Interrogatories
Set One

January 28, 2020

1. What will this do to the value of my property if and when I should decide to list my home for sale?

Company's Response:

Quinebaug Solar objects to this question on the grounds that it calls for information that is beyond the scope of this Petition and is not reasonably calculated to lead to evidence that will be admissible in this proceeding.

Moreover, any impact on surrounding property values is not within the scope of the criteria to be considered by the Siting Council as outlined in the Connecticut Public Utility Environmental Standards Act.

Subject to the foregoing objection, to the extent a response is required, the Petitioner states that residential property values are particularly subjective, and it is unclear what impact if any solar development would have on the surrounding area, which is currently used for agriculture, open space, and gravel extraction.

2. What are the health concerns due to the pollutants that these solar panels emanate?

Company's Response:

Quinebaug Solar objects to this question on the grounds that this question lacks foundation, as it assumes facts not in evidence in the record of this proceeding.

Subject to the foregoing objection, Petitioner states that Solar panels do not emit pollutants, and are considered a Class I renewable energy source pursuant to Connecticut General Statutes § 16-1(a)(20).

3. Who will be monitoring truck traffic to ensure it doesn't get out of control?

Company's Response:

The Project is expected to have a short-term impact on traffic flow during construction. Prior to construction, a traffic control plan will be developed in consultation with the Connecticut Department of Transportation and the Towns of Brooklyn and Canterbury Departments of Public Works. *See* Petition Section 6.1, Public Health and Safety.

4. Who is clearing the trees that will be needed to be taken down to construct this project?

Company's Response:

Quinebaug Solar will be responsible for all clearing on lands owned or leased by the Project.

5. How many acres of trees will need to be cleared out?

Company's Response:

The Project proposes to clear 71 acres of trees.

6. Who is going to pay for the potential water damage that I will have to my house due to the mass amount of trees removed? The water table will be impacted significantly taking down that many trees that water will no longer be absorbed by the trees and have nowhere to go.

Company's Response:

Quinebaug Solar objects to this question on the grounds that this question lacks foundation, as it assumes facts not in evidence in the record of this proceeding.

Subject to the foregoing objection, Petitioner states that it will apply for a Connecticut Department of Energy and Environmental Protection Construction General Permit for the Discharge of Stormwater and Dewatering Wastewater for Construction Activities and will abide by the terms of the permit. *See* Petition Section 6.14, Water Quality.

7. How long will it take to construct this solar panel project?

Company's Response:

The Project will be constructed to be commercially operational in September 2021. *See* Petition Exhibit J, Construction Schedule/Duration.

8. What will the hours of operation be for this project? Monday – Friday? Will there be weekends that work is done?

Company's Response:

Construction hours are expected to occur on weekdays during daylight hours. Some weekend work may be needed due to unforeseen circumstances. *See* Petition Section 3.4, Construction Schedule and Phasing.

9. Who will be putting up a fence and what type of fence to ensure this project is closed off to individuals that should not be on the premises?

Company's Response:

Three types of fencing are proposed for the Project: 1) perimeter fence; 2) collector substation fence; and 3) additional security fence. *See* Petition Section 3.4, Project Description: Fencing.

10. Will there be trucks idling (very early am) waiting to get into the dirt road because the gate is locked?

Company's Response:

No. Quinebaug Solar will comply with Connecticut regulations prohibiting unnecessary idling. *See* Petition Section 6.3, Air Quality.

11. How will you handle relocating all wildlife do to such a massive project?

Company's Response:

Quinebaug Solar objects to this question on the grounds that this question lacks foundation, as it assumes facts not in evidence in the record of this proceeding.

Subject to the foregoing objection, Petitioner states that wildlife avoidance and mitigation measures are described in detail in Petition Section 6.16, Avoidance, Minimization and Mitigation Measures, and Exhibit D, NDDDB Correspondence/Environmental Reports.

12. When is the proposed solar project going to commence once approved?

Company's Response:

See Response to Interrogatory 7 above.

13. Once the solar project is complete assuming approval how often is maintenance going to be required?

Company's Response:

See Petition Section 3.6, Operations & Maintenance, and Exhibit H, Operations and Maintenance Plan.

14. What happens if there is an emergency at night/day who will respond?

Company's Response:

The Project will ensure site safety and performance using 24/7 remote monitoring capabilities. Local emergency first responders will respond if necessary. Prior to operation, the Petitioner will meet with Town first responders to provide an orientation to the Project and information regarding response to emergencies at the Project Site. *See* Petition Section 3.6, Operations & Maintenance, and Section 6.1, Public Health and Safety.

15. What should I expect for the types of vehicles that will be in and out of the proposed solar site?

Company's Response:

Construction traffic along Wauregan road is expected to increase slightly compared to the current gravel operation activities. During construction it is expected that approximately 10-20 additional vehicles will access the site along Wauregan road per day. During operations, typical vehicle traffic to the site will be minimal and will generally consist of pickup trucks that will be monitoring and management the site periodically.

16. How will dust control be taken care of and the erosion of the dirt road and main roads traveled in and out?

Company's Response:

Project construction equipment may generate fugitive dust. Any such dust during construction will be temporary and will be controlled by appropriate mitigation measures, e.g. water spraying as needed. *See* Petition Section 6.3, Air Quality. Stone construction entrances will also be constructed to limit sediment tracking outside of the construction zone. Locations where vehicles enter or exit the site will be inspected for evidence of off-site sediment tracking in accordance with industry best practices.

17. I was told that this project was initially postponed due to a rare spotted frog or species. What has changed that this proposed project is now moving forward?

Company's Response:

Objection. This Interrogatory assumes facts not properly in the record of this Petition. Subject to the foregoing objection, Petitioner states that the Project has been comprehensively redesigned to avoid and minimize impacts to natural resources. Wildlife avoidance and mitigation measures are described in detail in Petition Section 6.16, Avoidance, Minimization and Mitigation Measures, and Exhibit D, NDDB Correspondence/Environmental Reports.

CERTIFICATION

I hereby certify that on January 28, 2020, the foregoing was delivered by electronic mail and regular mail, postage prepaid, in accordance with § 16-50j-12 of the Regulations of Connecticut State Agencies, to all parties and intervenors of record, as follows:

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