



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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www.ct.gov/csc

VIA ELECTRONIC MAIL

March 3, 2020

Lee D. Hoffman, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702

RE: **PETITION NO. 1347A** - GRE GACRUX 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 16.78-megawatt AC solar photovoltaic electric generating facility located at 117 Oil Mill Road and associated electrical interconnection to Eversource Energy's existing substation at 325 Waterford Parkway North in Waterford, Connecticut. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b).

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than March 17, 2020. 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 March 17, 2020 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 website under the "Pending Matters" link.

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.

Sincerely,

Melanie A. Bachman
Executive Director

c: Parties and Intervenors



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Petition No. 1347A

GRE GACRUX LLC – Waterford

Interrogatories- Set One

March 3, 2020

1. What is the expected capacity factor, on an AC MWh/AC MWh basis, of the project for the first year of operation? What is the average capacity factor over the 35-year life of the project?
2. Has the PURA approved Project PPA been modified to account for changes in Project output?
3. Petition pp. 8-9 describes an initial cleanup of the site. Does GRE intend to only clean the 45 acres within the project area or will the cleanup include the additional 21 acres that were logged, but outside the Project limits?
4. Petition p. 10 states a wood chip berm will be created around the Project limits. At what point will the wood chip berm be removed? Where will the wood chips be disposed of?
5. Referring to Petition pp. 10-11, has enough soil testing been conducted to determine likely areas of post-mount and ballast mount panel arrays? If so, depict expected areas of each type of installation. What method is more costly to install?
6. If concrete ballasts are to be used, would the ballasts be constructed on or off site? If on-site identify the location.
7. How long are the panel racking posts? What is the desired post installation depth?
8. Referring to Petition p. 13, a Project area of 75 acres is given. Specify the approximate acreage of grubbing and non-grubbing.
9. Referring to Petition p. 13, a low maintenance ground cover is described for the solar array area. What is the specific seed mix that will be used? Can the seed mix be established with robust growth where shaded by the solar panels? Has this mix been used at other solar sites in Connecticut? If so, identify locations.
10. Referring to Petition p. 14, it states areas between the perimeter fence and cleared edge will receive a mix of native low-lying plants, shrubs and groundcover. What specific plantings and seed mixes does GRE intend to install?
11. The construction hours on Petition p. 15 do not match the hours in the Petition Appendix C, please clarify. Are the construction hours for both the 2020 and 2021 work periods?
12. The MW AC output rating on Petition p. 22 and p. 5 of the Pre-file testimony of Jean-Paul La Marche do not match, please clarify.
13. Petition p. 22, mentions a field walk with CT DEEP Stormwater Division. Who attended the field walk? What was the result of the field walk?

14. Petition Figure 10 shows the limit of work extending along the north property line, north-northwest of the mapped wetland area. What work will occur in this area?
15. What is the estimated percentage of pre and post devolvement within the Vernal Pool Envelopes and Critical Terrestrial Habitat areas for the on-site vernal pools?
16. Has the logging road wetland crossing adjacent to VP-3 been evaluated for Project suitability? What modifications are necessary to accommodate construction vehicles?
17. Petition Figure 3A is not legible. Please provide a larger scale legible version.
18. Referring to Petition Site Plan C-3.0, what is the setback buffer shown along the east property line? Why is this setback buffer wider than the buffer along other property lines?
19. Referring to Site Plan C-3.3, a note specifies that the stumps remain in the area between panel array and limit of work. What is considered the edge of the panel array? For swales outside the panel array area, what is the width of grubbing required for installation?
20. Referring to Petition Site Plan C-5.0, Construction Sequence 2021 Note 1, why is mass earthwork being conducted after the site is initially stabilized rather than being completed when grubbing occurs during Construction Sequence 2020?
21. Estimate the amounts of cut and fill in cubic yards for Project construction. Where would excess material be disposed of?
22. Referring to Petition Site Plan C-5.5, straw wattle is specified above sediment trap 16 but not above other Project sediment traps. Please explain.
23. Referring to Petition Site Plan C-6.2;
 - a. do the 3:1 diversion swale side slopes conform to *the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control*?
 - b. why are 7 of the detention basins referred to as “ponds”? Are they designed with lower infiltration rates than the other 9 detention basins?
24. What is the total length and total area of post-construction gravel roads?
25. Petition p. 12 states the Project was designed in compliance with the latest iteration of CT DEEP General Permit Solar Appendix I. Please provide a copy of Solar Appendix I.
26. Referring to the Petition Stormwater Report (Appendix B), what Project elements/features were considered pervious and impervious surfaces in the stormwater calculations to design post construction stormwater controls?
27. Does DEEP Appendix I consider gravel roads as impervious cover? What Curve Number is assigned to impervious surfaces for stormwater calculations?
28. Were post-construction slopes factored into the stormwater design using the slope criteria in Solar Appendix I? In what areas will different stormwater controls be necessary to comply with Solar Appendix I? Submit a diagram showing post-construction slopes using thresholds described in Solar Appendix I.

29. The hard copy version of the Petition Appendix A contains a PV Site Plan series that was not submitted in .pdf format. Provide a .pdf version of the PV Plan series.
30. Has DEEP responded to the Project NDDB survey report, dated October 2, 2019? If so, please provide.
31. The hard copy and .pdf versions of Petition Figure 5 do not match. Please clarify.