



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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**VIA ELECTRONIC MAIL**

March 20, 2020

Jesse A. Langer, Esq.  
Updike, Kelly & Spellacy, P.C.  
8 Frontage Road  
East Haven, CT 06512-2101

RE: **PETITION NO. 1396** – CP East Hampton Solar I, LLC and CP East Hampton Solar II, 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 1.0-megawatt AC solar photovoltaic electric generating facility and a 0.975-megawatt AC solar photovoltaic electric generating facility on an approximately 27 acre parcel located generally west of Skinner Street (Route 196) and south of Forest Street in East Hampton, Connecticut and associated electrical interconnection.

Dear Attorney Langer:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 17, 2020. To help expedite the Council's review, please file individual responses as soon as they are available. Please provide an electronic copy to this office only.

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,

*s/ Melanie A. Bachman*

Melanie A. Bachman  
Executive Director

MB/MP

**Petition No. 1396**  
**Interrogatories**  
**Set One**  
**March 20, 2020**

**Project Development**

1. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
2. Referencing page 8 of the March 6, 2020 Petition for Declaratory Ruling (Petition), if approved by the Council, is CP East Hampton Solar I, LLC's and CP East Hampton Solar II, LLC's (collectively, CPEHS) proposed virtual net metering VNM project contingent upon clearing the Year 9 ZREC Auction in April 2020, or would this VNM project go forward even if it does not clear this ZREC Auction?

**Proposed Site**

3. Are there any provisions in the lease agreement with Skinner Street Properties LLC related to site restoration at the end of the project's useful life? If so, please provide any such provisions.
4. Are the solar photovoltaic panels recyclable?
5. Provide the distance, direction and address of the nearest off-site residence from the solar field perimeter fence.

**Energy Output**

6. Have electrical loss assumptions been factored into the output of the facility? What is the output (MW AC) at the point of interconnection?
7. What is the projected capacity factor (expressed as a percentage) for the proposed project? For clarity, is this capacity factor based on a ratio of AC MWh to AC MWh, or a ratio of AC MWh to DC MWh?
8. Would the power output of the solar panels decline as the panels age? If so, estimate the percent per year.
9. Would the impact of soft or hard shading reduce the energy production of the proposed project? If so, was this included in the proposed projects capacity factor?
10. Could the project be designed to serve as a microgrid or to accommodate a potential future battery storage system?
11. If one section of each solar facility experiences electrical problems causing the section to shut down, could other sections of the system still operate and transmit power to the grid? Similarly, could one of the two solar facilities remain in service if the other facility is shut down?

### **Site Components and Solar Equipment**

12. Will the panels be mounted in a portrait or landscape fashion?
13. Referencing Tab 1, Appendix D of the Petition, Sheet SP-1, two 10-foot by 20-foot concrete pads are proposed. Would the transformers for each facility be located on these pads?
14. Referencing Tab 3 of the Petition, Decommissioning Plan, page 2, CPEHS notes “The concrete foundation designs for each PV Facility consists of one (2) Equipment Pad switchboard slabs (each 10’ x 20’ x 1’) amounting to 400 cubic yards of concrete.” Is it correct to say that the two slabs would total about 15 cubic yards of concrete? Explain.
15. Is the wiring from the panels to the inverters installed on the racking? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation maintenance, or animals?
16. What are the lengths (in feet) of the existing and proposed (final) access route? Are any upgrades, such as gravel, required to make the existing portion of the access route suitable for the construction and maintenance of this proposed solar facility?
17. Referencing Tab 1 of the Petition, Environmental Assessment (EA), p. 14, CPEHS notes that “Based upon the reviewed mapping, the Site is classified as Zone X...” Is this unshaded Zone X?

### **Interconnection**

18. Is the project interconnection required to be reviewed by ISO New England, Inc. (ISO-NE)?
19. Did a system impact study need to be performed by The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) to ensure that the distribution system can support the two solar facilities totaling 1.975 MW AC. Provide the results or status of such study if applicable.
20. Would the electrical connection from the solar facilities remain underground until immediately east of the access road turnaround, convert to overhead at the two adjacent proposed utility poles and continue overhead to connect to existing distribution on Skinner Street?
21. Is the existing electrical distribution on Skinner Street three-phase, or would it have to be upgraded from single-phase to three-phase?

### **Public Safety**

22. Referencing Tab 1 of the Petition, EA, page 30, CPEHS notes that “The only noise generating equipment planned at the Facility are the inverters.” Referencing page 6 of the Petition, would the two proposed transformers materially affect the noise analysis?
23. Referencing Tab 7A, FAA Determination letters, is there a Crane Point 8? If yes, provide the FAA determination letter for Crane Point 8.

24. Referencing Tab 7A, FAA Determination letters, is there a Solar Panel Point 2? If yes, provide the FAA determination letter for Solar Panel Point 2.
25. With regard to the emergency response procedure behind Tab 2:
  - a. Is outreach and/or training necessary for local emergency responders in the event of a fire or other emergency at the site?
  - b. How would site access be ensured for emergency responders?
  - c. In the event of a brush or electrical fire, how would CPEHS mitigate potential electric hazards that could be encountered by emergency response personnel?
  - d. Could the entire facility be shut down and de-energized in the event of a fire? If so, how?

### **Environmental**

26. Does CPEHS have an invasive species control plan for this project? If yes, please provide a copy of such plan.
27. Does the proposed project account for potential shading from mature trees around the periphery of the site?
28. Are there any wells on the site or in the vicinity of the site? If so, what construction activities could have an impact on these wells?
29. What effect would runoff from the drip edge of each row of solar panels have on site drainage patterns? Would channelization below the drip edge be expected? If not, why not?
30. What is the length of the posts and to what depth would the posts be driven into the ground to provide structural stability? Are any impacts to groundwater quality anticipated? If so, how would CPEHS manage and/or mitigate these impacts?
31. Referencing Tab 1 of the Petition, EA, p. 31, describe the leaf-off views of the proposed facility from the abutting properties to south, including the residence located about 60 feet from the southern clearing limits. What visual mitigation measures, if any could be installed to reduce potential views?
32. Referencing Tab 1 of the Petition, EA, p. 30, CPEHS notes “The abutting Airline State Park Trail that passes to the north, is approximately 10 to 15 feet lower in elevation than the Site...” What is the ground elevation of the Airline Trail? How does that elevation compare to the elevation of the top edge of the solar panels?

### **Facility Construction**

33. For the proposed concrete pads, would the concrete be pre-cast or poured on site? If poured on site, does CPEHS have a plan for washing out the concrete trucks? Explain.
34. Has CPEHS met with the DEEP Stormwater Division? If yes, when? Please describe any recommendations, comments or concerns about the project provided by the Stormwater Division.

35. With regard to earthwork required to develop the site, provide the following:
- a) Will the site be graded? If so, in what areas?
  - b) What is the desired slope within the solar array areas?
  - c) Could the solar field areas be installed with minimal alteration to existing slopes?
  - d) If minimal alteration of slopes is proposed, can existing vegetation be maintained to provide ground cover during construction?
  - e) Would the excess 1474 cubic yards of cut material be removed from the site property or deposited on the site property?
36. Would topsoil be stripped from the site prior to grading? If so, would the topsoil be spread over the disturbed areas once grading is complete? If not, how would growth of new vegetation/grasses be promoted within the graded areas if nutrient rich soils are not present?
37. How would the posts (that support the racking system) be driven into the ground? In the event that ledge is encountered, what methods would be utilized for installation?
38. Referencing Tab 8 of the Petition, Appendix E, Test Pit Locations, based on the review of subsurface conditions completed, do site conditions support the overall project design, including the stormwater control features? Explain.

#### **Maintenance Questions**

39. Would CPEHS store any replacement modules on-site in the event solar panels are damaged or are not functioning properly? If so, where? How would damaged panels be detected?