



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 11, 2020

Bruce L. McDermott, Esq.
Murtha Cullina LLP
265 Church Street
New Haven, CT 06510

RE: **PETITION NO. 1401** – Revity Energy, 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 12.25 megawatt AC solar photovoltaic electric generating facility on approximately 74.9 acres located at 424 Snake Meadow Road, Plainfield, Connecticut and 0 Valley Road, Sterling, Connecticut, and associated electrical interconnection to Eversource Energy's Fry Brook Substation.

Dear Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than May 26, 2020. To help expedite the Council's review, please file individual responses as soon as they are available. At this time, consistent with the Council's policy to prevent the spread of Coronavirus, please submit an electronic copy only to siting.council@ct.gov. However, please be advised that the Council may later request one or more hard copies for records retention purposes.

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 Bachman

Melanie Bachman
Executive Director

MB/MP

c: Ryan Palumbo, Revity Energy LLC

Petition No. 1401
Interrogatories
Set One
May 11, 2020

Notice

1. Was the Town of Plainfield Conservation Commission provided notice of the petition? If not, provide proof that such notice was sent to the Town of Plainfield Conservation Commission.

Project Development

2. If Revity Energy LLC's (Revity or Petitioner) project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
3. Would the Petitioner participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?

Proposed Site

4. In the lease agreement with Joseph Vinagro, are there any provisions related to site restoration at the end of the project's useful life? If so, please provide any such provisions.
5. Referencing page 3 of the Decommissioning Plan, could components of panels be reused to make photovoltaic cells or whole panels be used to make new solar panels at the end of the life of this project? Could the solar panels and/or associated components be repurposed for a different use or product?

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. 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?
8. Do solar facilities present a challenge for the independent system operator for balancing loads and generation (to maintain the system frequency) due to the changing (but not controlled) megawatt output of a solar facility? What technology or operational protocols could be employed to mitigate any challenges?

Site Components and Solar Equipment

9. Page 7 of the Petition states, "However, the Project will include seven equipment pads..." Sheet 6 of 19 depicts five "Concrete Equipment Pads." Where would the remaining two pads be located? If necessary, please update the required drawing(s).
10. How many panels would each rack hold?

11. 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?
12. Referencing page 9 of the Petition, Revity states, “Roughly 2,017 feet of existing unpaved farm and mining operation roads will be improved...” What types of improvements (e.g. gravel) would be required to make it suitable for the construction and maintenance of this proposed solar facility?
13. Referencing page 12 of the Petition, Revity notes that, “[T]he row-to-row spacing will be 15 feet.” What is the minimum row-to-row spacing or “aisle width” at which the solar panel rows could be installed?
14. Referencing page 42 of the Environmental Assessment, a portion of the gravel access to be upgraded is located within the Federal Emergency Management Agency (FEMA) Flood Zone A. How would such flood zone impact access to the site?

Interconnection

15. Is the project interconnection required to be reviewed by ISO-NE?
16. Referencing page 9 of the Petition, has the impact study application been submitted to Eversource? If no, approximately when does Revity plan to submit such application to Eversource?
17. Does the Petitioner have an Interconnection Agreement with Eversource? Provide the status of such agreement.
18. At what point would the underground electrical connection from the solar facility transition to an overhead progression before leaving the subject property? How many utility poles are required on the subject property for this transition? How tall would the proposed utility poles be?
19. Referencing page 9 of the Petition, is the existing Eversource 23-kV circuit three-phase, or would it have to be upgraded from single-phase to three-phase?

Public Safety

20. What is the status of the Federal Aviation Administration (FAA) aeronautical policy referenced on page 23 of the Petition?
21. With regard to emergency response:
 - a. In the event of a brush or electrical fire, how would the Petitioner mitigate potential electric hazards that could be encountered by emergency response personnel?
 - b. Could the entire facility be shut down and de-energized in the event of a fire? If so, how?

Environmental

22. Page 17 of the Petition states that, “No raw or hazardous materials or fuels will be delivered to or stored at the Property.” Please reconcile this statement with Appendix E of the Petition – Wetland & Vernal Pool Protection Plan, Section 3 – Petroleum Materials Storage and Spill Prevention.

23. Did the Petitioner conduct a Shade Study Analysis? Would shading present any challenges for the proposed project? If so, provide acreage of trees that would be removed to mitigate for shading? How were the limits of tree shading determined?
24. Are there any wells on the site or in the vicinity of the site? If so, how would the Petitioner protect the wells and/or water quality from construction impacts?
25. What effect would runoff from the drip edge of each row of solar panels have on the site drainage patterns? Would channelization below the drip edge be expected? If not, why not?
26. Would the proposed project be consistent with the 2015 U.S. Army Corps of Engineers Vernal Pool Best Management Practices?
27. 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 the petitioner manage and/or mitigate these impacts?
28. Referencing page 24 of the Petition, it states, "Revity will provide the results of this Phase 1B to the Council once it is completed." What is the status of the Phase 1B cultural resources assessment and reconnaissance survey?
29. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

30. Would the location of the solar array in relation to Snake Meadow Brook and its associated watercourses interrupt or otherwise impede wildlife access to the area? Please explain.

Facility Construction

31. Has the petitioner met with the DEEP Stormwater Division? If yes, when? Please describe any recommendations, comments or concerns about the project provided by the Stormwater Division. Would site construction conform to DEEP's proposed revisions to the General Permit, including draft Appendix I, *Stormwater Management at Solar Array Construction Projects*?
32. Has Reivity considered utilizing a 100-foot wetland buffer? Explain why or why not.
33. With regard to earthwork required to develop the site, provide the following:
- a) In what areas would the site be graded?
 - 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 are proposed, can existing vegetation be maintained to provide ground cover during construction?
 - e) Estimate the amounts of cut and fill in cubic yards for the access road(s)
 - f) Estimate the amounts of cut and fill in cubic yards for solar field grading.
 - g) If there is excess cut, will this material be removed from the site property or deposited on the site property?
34. 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?
35. 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?
36. What is the minimum road width required for post-construction use?
37. Has a comprehensive geotechnical study been completed for the site to determine if site conditions support the overall Project design? If so, summarize the results. If not, has the Petitioner anticipated and designed the Project with assumed subsurface conditions? What are these assumed conditions?

Maintenance Questions

38. Describe the type and frequency of anticipated vegetation management for the site. Include areas inside and outside of the perimeter fence, as well as detention basins and swales.
39. Would the installed solar panels require regular cleaning or other, similar, maintenance? If so, describe cleaning procedures including substances used. Would this maintenance activity have any impacts to water quality?
40. If applicable, what type of methods would be employed to clean the panels and how often?
41. Are there provisions for more frequent inspections of the Project Site in the first few years of operation to monitor and remediate areas of patchy site cover growth, site erosion and detention basin/swale integrity?

42. Would the Petitioner 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?