

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

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GREENSKIES CLEAN ENERGY, LLC Petition for)
a Declaratory ruling, pursuant to Connecticut General) Petition N. 1410
Statutes §4-176 and §16-50k, for the Proposed)
construction, maintenance and operation of a 3.0)
megawatt AC solar photovoltaic electric generating)
facility on two parcels at the Elmridge Golf Course)
located to the east and west of North Anquilla Road)
at the intersection with Elmridge Road, Stonington,) August 6 , 2020
Connecticut and associated electrical interconnection.)
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**INTERROGATORIES DIRECTED TO GREENSKIES CLEAN ENERGY, LLC
FROM DOUGLAS HANSON**

Pursuant to the revised Schedule dated June 22, 2020 in the above referenced Petition, Douglas Hanson, (“Hanson”) asks that the Petitioner, GREENSKIES CLEAN ENERGY, LLC, respond to the following interrogatories:

“Petition” means the PETITION NO. 1410 - Greenskies Clean 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 3.0-megawatt-AC solar photovoltaic electric generating facility on two parcels at the Elmridge Golf Course located to the east and west of North Anguilla Road at the intersection with Elmridge Road, Stonington, Connecticut, and associated electrical interconnection, including any and all Exhibits referenced therein.

- 1) What specific type of panel modules are going to be used in the Project?

- 2) What specific type of inverters are going to be used in the Project?

- 3) Do the proposed panels to be used contain lead, arsenic, selenium, cadmium, PFAS, or other hazardous materials or heavy metals? Do you have leaching studies for the panels?

- 4) Did the petitioner consider the solar panels to be impervious or pervious in calculating peak rate and water quality volume? Please explain that decision.

- 5) Why was no noise survey or modeling analysis submitted with this petition, given the proximity of residential homes to the site?
- 6) What is the current background noise level day and night in surrounding area? What will the increase be should this project be built?
- 7) Who drafted petitioner's response to #19 of the Council's first set of interrogatories, with respect to noise issues? What qualifications does that individual possess to opine on noise projections and measurements?
- 8) Provide the noise emitting specifications for the specific type of panel modules/ inverters that will be used in the Project.
- 9) Identify "all other selected systems equipment" as that is meant in Section 6.3.2 of the Petition.
- 10) Identify any efforts made by Petitioner to conduct a noise study/ evaluation, or otherwise measure the expected noise emitted from the Project to the property located at 6 Woodland Court (the "Property") and/ or other neighboring parcels, and identify the expected noise to be generated from the Project to the Property and/or neighboring parcels. For any such noise study/ evaluation, identify the specific type of panel module and inverters that were considered.
- 11) On what basis does Greenskies conclude that "the proposed Project is expected to have no adverse noise-related impact on the surrounding area"?
 - a. Were tests conducted and reports of those tests generated?
 - b. If so, please identify them.
- 12) On what basis does Greenskies conclude, through its Petition, that "any sound generated by the equipment located at the pads is expected to be attenuated by distance [. . .] and will not be detectable beyond the Project parcel"?
 - a. Identify any tests, simulations or other studies, upon which this conclusion is based, all reports or memorandums or other documentation prepared of the results of such tests, and the preparer thereof.

- 13) What efforts have been undertaken to ascertain whether PFAS or other potentially hazardous materials will leach into the groundwater and impact water quality for public and private wells. Please describe in detail the results of the same?
- 14) What efforts have been made to ascertain whether PFAS or other potentially hazardous materials could cause environmental disruption to the project area and/ or neighboring parcels?
- 15) What efforts have been made to study and mitigate the visibility of the solar panels from various levels and elevations of the Property located at 6 Woodland Court?
- 16) Did you consider a project array and/or layout on the western portion of the Elm Ridge Golf Court property prior to submitting the current Petition?
 - a. If the answer to the foregoing is in the affirmative, please describe that alternative in detail and the reason(s) for rejecting it in favor of the current proposal.
- 17) What alternative project layouts have been considered, and would any of those layouts or locations mitigate visibility of the solar panel array from adjacent residential properties?
 - a. If so, why were those sites or layouts not selected?
- 18) What impact, if any did the location of existing power lines have on your proposed project layout?
- 19) Describe in detail how the proposed Facility will be cleaned, or otherwise cleared of debris, animal droppings, snow (and other elementals), and vegetation. Please include in your response, without limitation:
 - a. The frequency of any such cleaning and maintenance;
 - b. A description of equipment that will be used for any such cleaning/ maintenance.
- 20) The Petition provides that “the southern end of the East Project area will be most visible from the property lines at 5 and 6 Woodland Ct. [. . .]” and that these “are the closest to the

proposed project. The view is somewhat restricted from within the properties by existing mature trees and understory vegetation during the growing season.”

- a. Does the petitioner acknowledge that the view of the project will not be restricted from these properties during those seasons where vegetation is not blossoming, such as fall and winter?
 - b. Describe with specificity the elevation from which the Petitioner viewed the property from 5 and 6 Woodland Ct in order to offer this conclusory statement.
- 21) Describe in detail the “landscape plan,” contemplated in Section 6.12.3 of the Petition, as it relates to mitigating the visibility of the project from the property located at 6 Woodland Court, including whether any portion of the panels, array, or related facilities will be visible from various elevations or levels of property.
 - 22) What process, if any, was used to determine how waterflow would or would not be more greatly diverted toward 5 and 6 Woodland Ct?
 - 23) Was any work performed or assessment made of the impact to the view of the owners at 5 and 6 Woodland Court, with regard to visibility of the panels from various levels of their homes? If not, explain why.
 - 24) Which corporate entity ultimately will receive the incentive monies from the State of Connecticut that are associated with this project?
 - 25) Section 3.1.3 of the Petition refers to potential alternative site, please identify which alternate site(s) or project layout(s) were “investigated” and describe the extent of such investigation(s) in detail.
 - 26) State whether an arrangement of arrays that would be of equal production to the current proposed arrays is possible within other areas of the Project Site that would effect the visual and audible impact upon the Property to a less extent than under its current configuration.

If the response to this interrogatory is in the affirmative please describe the alternative arrangement(s) and the reason(s) for proceeding with the presently proposed array arrangement.

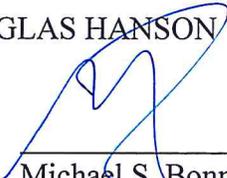
- 27) Section 3.5 of the Petition states that “ongoing site maintenance activities will occur regularly,” at the Project Site. Describe those activities in detail and the projected schedule and frequency of such activities.
- 28) On Page 19 of the Petition, you indicate that that you reached out to abutters to address and speak to their concerns, and reference the “relevant correspondence” in Appendix K. However, upon review of Appendix K, only the letters *from* Greenskies are included. Please provide all further correspondence with the abutting neighbors.
- 29) On Page 24 of the Petition, you state that “[a]ny sound generated by the equipment located at the pads is expected to be attenuated by distance, slatted fence and existing vegetation and will not be detectable beyond the Project parcel.”
 - a. Provide any substantiation of this claim.
 - b. Was a noise study conducted?
 - c. If yes, describe the parameters of the study itself, the result and describe in detail the findings of such study and a copy of the same.
 - d. If no, then explain why, with so many homes in close proximity to the Project Site, a study was not conducted.
- 30) Is it your expectation that the council will approve this project without the benefit of a full specification for the equipment to be used?
- 31) Is it your expectation that the council will approve this project without the benefit of an actual noise modeling analysis?
- 32) Do you believe it valuable for the public to have a chance to openly ask questions regarding this project at a public hearing?
- 33) Appendix M of the Petition provides ground-view only visibility of the view assessment. The homes that abut the Project site consist of multi-story homes. Why were drones not utilized to provide an accurate depiction of what home-owners that abut the project would actually view from their home?

- 34) Do you consider it a material change in the visual aesthetic of the perspective of the homeowner at 6 Woodlawn Court in what that homeowner will be forced to look at after the project is completed?
- a. Explain how you came up with your response.
- 35) On page 39 of the Petition, you state, “the East Project will be visible from these property from a great distance.”
- a. Provide your definition of “great distance,”
 - b. Provide how you arrived at this definition.
- 36) State whether the Petitioner contacted the Elm Ridge Golf Course property owner(s) regarding the proposed project or whether the property owner(s) contacted the Petitioner to undertake the current project.
- a. Please state the date of the initial communication(s) between the Petitioner and the property owner(s).
 - b. Please identify the individuals who were party to the initial communications.
 - c. Please state whether the Petitioner or the property owner(s) made the final decision on the layout and location of the project site, and state in detail the considerations that went into the final decision.
- 37) Will this project require any improvements to be made to any local roads?
- 38) Did Petitioner consider the potential impact of this development on Anguilla Brook or Fishers Island Sound?
- 39) According to Petitioner’s responses to the Council’s first set of interrogatories, it appears that petitioner believes its site plans comply with CT DEEP’s proposed changes to the General Permit, as reflected in Appendix I. Please explain how each provision of section (1) of the “design and construction requirements” in that document is satisfied by the site plans.

- 40) Please describe any meetings with CT DEEP stormwater personnel since the Petitioner's submission of its General Permit application on July 13, 2020, including any requests made for changes to the site plans.
- 41) Why are there no forebays or other pretreatment practices upstream of the stormwater basins?
- 42) On Sheet LA-3, there is a note about 12 inches of topsoil being required for "planting beds." What is a "planting bed"? Does that phrase encompass the areas under the arrays?
- 43) Much of the array limits appear to go right to the edges of the 100-foot wetland buffers. Given that the wetlands delineations occurred in winter months, how confident is Petitioner that those delineations were accurate? Please explain.
- 44) Given that Petitioner is proposing to do all clearing in the winter months, how will it guard against erosion? When will the vegetation be established? Will Petitioner be installing the solar array posts and racks before any grass cover has stabilized the site?
- 45) Has the Petitioner reviewed the comments submitted by the Stonington planning and zoning commission? If so, what is Petitioner's response to the issues raised therein, including items #1 through 11 in the submission by CLA Engineers?
- 46) Has the Petitioner ever constructed a ground-mounted solar array in a groundwater protection overlay district? If so, please provide information on that project.
- 47) Have the site plans been reviewed with the local fire marshal to ensure compliance with CT fire safety code, particularly chapter 11.12?

DOUGLAS HANSON

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CERTIFICATION

I hereby certify that on this 6th day of August, 2020 that 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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with paper copy to

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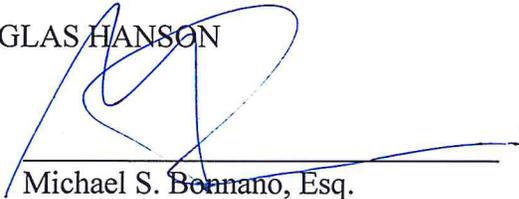
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