

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Greenskies Clean Energy, LLC petition for a declaratory ruling 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

Petition No. 1410

July 23, 2020

GREENSKIES CLEAN ENERGY, LLC'S RESPONSES TO THE FIRST SET OF INTERROGATORIES DIRECTED TO GREENSKIES CLEAN ENERGY, LLC FROM THE CONNECTICUT SITING COUNCIL

Petitioner Greenskies Clean Energy, LLC ("GCE" or "Petitioner") hereby submits the following responses to the First Set of Interrogatories that were directed to GCE by the Connecticut Siting Council on July 2, 2020.

**PETITION #1410 (ELMRIDGE GOLF) – CSC INTERROGATORIES SET 1
RESPONSES**

Project Development

- 1. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?*

Permits required for the proposed Project are the Connecticut Department of Energy and Environmental Protection (the "CTDEEP") General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (the "General Permit"), as well as building and electrical permits from the Town of Stonington Building Department. Greenskies will hold the General Permit, and the Project's contractor¹ will hold the building and electrical permits.

Further, as noted in Section 5.0 of the Petition, Greenskies received confirmation from the Connecticut Department of Agriculture ("DOA") that the Project will result in no material impact to prime farmland. Additionally, the CTDEEP's Division of Natural Resources determined that the Project will have no impact on "core forest" resources. Greenskies received an NDDB determination with recommendations for protection of habitat for one species of insect and no further action with regard to one protected amphibian. The CT State Historic Preservation Office provided a letter of concurrence that no further archaeological survey work is required.

¹ Once final civil and electrical designs are complete, a contractor will be selected.

2. *Would the Petitioner participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?*

No, the Petitioner does not intend to participate in the ISO-NE Forward Capacity Auction.

3. *Please describe the SG2 tariff.*

SG2 is the Self-Generator Rate; SG2 is available to any customer distributed generating facility that interconnects to the utility company's facilities for the purpose of selling energy to the utility company. The SG2 rate is equivalent to 95 percent of the applicable monthly average of the New England Power Pool ("NEPOOL") market clearing prices for energy.

Energy Output

4. *Have electrical loss assumptions been factored into the output of the facility? What is the output in MW AC of the East and West arrays at the point of interconnection?*

Yes, standard loss factors have been factored into the Facility's system production analysis. At the point of interconnection, the West array has a maximum output capacity of 1000 kW AC, and the East array has a maximum output capacity of 2000 kW AC.

5. *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?*

The projected capacity factor for both the East and West arrays is 14.9 percent. This is based on AC MWh to DC MWh, and is expressed as:

$$\text{Capacity factor (\%)} = (\text{production in kWh}) / (\text{system size kWdc} * 8760) * (100)$$

6. *Is the project being designed to accommodate a potential future battery storage system? If so, please indicate the anticipated size of the system and where it may be located on the site.*

No, the Project has not been designed to accommodate a potential future battery storage system.

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?*

Yes, any shading will reduce the Facility's energy production. However, expected inter-row shading has been factored into the Project's production analysis. An assumed loss for shading caused by debris such as dirt, leaves, or snow on the module surface has also been factored into said analysis.

8. *Could the project be designed to serve as a microgrid?*

No, the Project cannot be designed to serve as a microgrid. This is credited to the fact that the respective utility company's interconnection application does not include batteries or any of the infrastructure that is necessary for the Project to provide microgrid function. Additionally, the subject revenue contracts do not include microgrid effects.

9. *If one section of the solar array experiences electrical problems causing the section to shut down, could other sections of the system still operate and transmit power to the grid?*

Yes; throughout the Facility's array, sections of modules are connected to multiple inverters—thereby ensuring that an inoperable inverter will not impede the functionality of the other inverters.

10. *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?*

Generally speaking, large solar facilities can present grid management issues for the independent system operator ("ISO") or transmission operator; however, those issues are reviewed on a site-by-site basis.

The proposed Project is small enough, however, that any potential impacts will not back feed onto the ISO/transmission system and will therefore not need to be mitigated. Importantly, Eversource has already provided Greenskies with a Project impact study that confirms that the Project will not negatively impact the existing local grid either.

Regarding the Council's inquiry about mitigative technology/operational protocols, technologies such as, energy storage, ramp rate, and frequency controls, as well as VAR metering and associated controls, can be used to reduce impact(s) to the grid. None of these technologies, however, are necessary for the proposed Project.

Interconnection

11. *Is the project interconnection required to be reviewed by ISO-NE?*

No, given the size of the project, Eversource was not required to include ISO-NE in its interconnection review process for the Project. ISO-NE transmission studies are generally recommended for systems equal to or greater than five (5.0) MW AC; the Project's proposed system size/generation is three (3.0) MW AC.

12. Referring to petition App. B, it appears the interconnection plans Part-B2 and Part-B3 are the same. Please clarify.

The Part-B2 plan was mistakenly uploaded in duplicate. Please see the correct electrical layout/site plan for the West array (i.e., Part- B3), attached hereto as Exhibit A.

13. Referring to petition p. 10, what is the status of the interconnection agreements?

Greenskies submitted the three, signed (3) subject interconnection agreements to Eversource at the end of March 2020. Thereafter, on May 26th, Greenskies requested a status update from the Eversource Project Manager who indicated that the submittals would be forwarded to appropriate staff for final review and execution.

Public Safety

14. Where is the nearest federally-obligated airport? Is a glare analysis required to comply with Federal Aviation Administration policy?

The nearest federally-obligated airport appears to be the Groton-New London Airport,² located at 155 Tower Ave, Groton, CT—approximately thirteen (13) miles southwest of the proposed Project Site.

Because the FAA does not require glare analyses for projects located thirteen (13) miles away from the closest federally-obligated airport facility, Greenskies has not conducted one for the Project. Greenskies notes, however, that the Project is not expected to have an adverse impact on air navigation. In addition to the Project's distance from the Groton-New London Airport, the selected panels for the Project are designed to absorb light, rather than reflect, and will therefore not transmit a great deal of glare. Accordingly, given the distance of the Project from the nearest airport, and the lack of glare from the proposed panels, the Project is not anticipated to have an adverse impact on air navigation.³

15. Referring to petition p. 11, will the petitioner conduct outreach to local emergency responders prior to project operation and offer fire/electrical safety training if requested?

Typically, when a solar project is nearing completion and final inspection, the respective local Fire Marshal will perform a site walk to inspect signage, site access (in case of emergency), emergency shutoff, disconnect locations, and anything relevant to their response of an event. Accordingly, for the instant Project, Greenskies will offer to host such

² In 1984, the State was approved to hold an FAA Airport Operating Certificate (AOC) to operate commercial air service which flew until 2004; and the Groton-New London Airport retains its AOC today.

³ There is also the Westerly State Airport (Rhode Island), located approximately four (4) to five (5) miles away from the proposed Project Site. Per Siting Council requirements, however, applicants are only required to study air facilities that are located within two (2) miles of a project site; as such, the Petitioner did not conduct an analysis for this facility.

a site walk, training, and Project design review with the appropriate Stonington officials, and expects that such a walk-through and training will happen.

Environmental

16. *Referring to petition Figure 4A, indicate the location of the proposed site on the map.*

Please see the revised Figure 4A, *Stonington Recommended Road Classifications*, attached hereto as Exhibit B, for the proposed Site location.

17. *Are there any wells in the vicinity of the two solar field sites? If so, how would the petitioner protect identified wells and/or water quality from construction impacts?*

To obtain information on private water supply wells within the vicinity of the Project Site, Greenskies was referred to the Ledge Light Health District (“LLHD”), which serves as the local health department for several southeastern Connecticut towns, including Stonington. An LLHD representative provided Greenskies with all publicly available information on the private wells within the Project’s surrounding area.

Accordingly, Greenskies was informed that residences within the High Ridge Association neighborhood—south of the East Project Area—are on public water supply (i.e., Westerly Water Company) and, therefore, do not utilize private wells.

Greenskies also requested private well information for the following addresses:

- 224 Elmridge Rd.
- 252 Elmridge Rd.
- 258 Elmridge Rd.
- 154 N. Anguilla Rd.
- 175-177 N. Anguilla Rd.
- 153 N. Anguilla Rd.
- 143 N. Anguilla Rd.
- 139 N. Anguilla Rd.
- 105 N. Anguilla Rd.
- 95 N. Anguilla Rd.
- 94 N. Anguilla Rd.

LLHD provided all available information, and Greenskies obtained copies of Well Drilling Permits for the following residences: 224 Elmridge Rd., 252 Elmridge Rd., 258 Elmridge Rd., and 154 N. Anguilla Rd. However, LLHD did not have any well records for the following residences: 139 N. Anguilla Rd., 143 N. Anguilla Rd., 153 N. Anguilla Rd. and 175-177 N. Anguilla Rd.

The private wells serving residences at 224 and 258 Elm Ridge Rd. and 154 N. Anguilla Rd. are respectively located at 360 feet, 260 feet, and 420 feet from the East Project Parcel. Due to the wells’ distance(s) from, and lack of proximity to, the proposed Project, Greenskies

does not anticipate that same will be impacted by the construction and installation of the Facility. In addition, no blasting will occur during Site preparation(s) for either the East or West Project Area(s); limited excavation work will occur for stormwater basin construction.

Please refer to Exhibit C for a map depicting the above-referenced abutter well locations.

To further ensure that the identified wells are protected from any potential construction-related impact(s), Greenskies prepared a Stormwater Report as part of its CTDEEP General Permit application.⁴ Said Report includes proposed water quality management measures for the Project, an erosion and sediment control plan (“E&S Plan”), as well as a stormwater construction waste management plan (the “Waste Management Plan”).

Water quality measures are similarly included in the stormwater management design for the Project; implementation of these measures will ensure that the water quality of the identified resources is maintained both during and after Project construction. For stormwater BMPs maintenance, a post-construction operation and maintenance plan (“O&M Plan”) has been developed as well. The O&M Plan describes the required frequency of inspections and maintenance procedures to sustain long-term functionality of the Project’s proposed stormwater features. The Petitioner’s Waste Management Plan addresses all matters relating to waste handling, staff training, and spill prevention and control.

18. *What is the length of the posts and to what depth would the posts be driven into the ground? What are the impacts to groundwater quality resulting from this activity and how would the petitioner manage and/or mitigate these impacts?*

Prior to commencing construction of the Facility, the Petitioner will conduct geotechnical borings within the proposed array-area to verify its soil properties. The results of same will inform the respective foundation designs for the Project’s posts and solar panel racking systems. Typically, however, posts range in length from six (6) to twelve (12) feet; as such, the Petitioner expects that the posts that will ultimately be used for the Project will be in this range of length.

The Petitioner does not foresee impacts to groundwater quality resulting from this activity. As a preliminary matter, the posts will be comprised of steel, which is known for its corrosion resistance and durability properties.⁵ In addition, adherence to the stormwater plans (referenced in the Petitioner’s response to Interrogatory No. 17 above) will ensure that the water quality is maintained both during and after Project construction.

⁴ The Stormwater Report is included in Petition No. 1410. See Appendix L

⁵ See International Stainless Steel Forum, *Stainless Steel in Solar Energy Use*, accessible at, https://www.worldstainless.org/Files/ISSF/non-image-files/PDF/ISSF_Stainless_Steel_in_Solar_Energy_Use.pdf

19. Referring to petition pp. 23-24, although the information provided states noise will attenuate with distance, is there any testing or modeling data available to ensure the expected noise 204 feet from the inverter location at the West Project Area would meet State noise control criteria?

Sound propagation on a site depends on several factors, including, *inter alia*, ground cover, terrain, and the presence of existing vegetation/trees and intervening objects (e.g., fences, structures). Assuming a relatively hard and flat ground cover (such as pavement, packed dirt, or water), sound from stationary sources generally reduces six (6) dBA per doubling of distance. Assuming flat ground with a softer ground cover (e.g., grass), sound reduces approximately 7.5 dBA per doubling of distance.⁶

As noted in Subsection 6.3.2 (p. 23) of the Petition, equipment located on the West Project Area pad will typically generate 55 dBA at a distance of three (3) meters (or 9.8 feet). The closest equipment pad to the nearest residential property line (i.e., 139 N. Anguilla Rd.) is 204 feet. In accordance with the general formula presented above, that equipment is expected to generate 47.5+/- dBA at 20 feet; 40+/- dBA at 40 feet; 32.5+/- dBA at 80 feet; and, 25+/- dBA at 160 feet. Using the inverse square law and calculator to estimate sound levels, this translates to 28.8 dB at a distance of 204 feet. Intervening cover will consist of soft vegetation/meadow and a stretch of gravel access road; there will also be an intervening, slatted fence and existing mature trees between the source and property line—thereby further mitigating noise effects.

20. 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

⁶ This figure is based on sound propagation calculated according to the ISO 9613 Standard for “Attenuation of Sound During Propagation Outdoors – Part 2: General Method of Calculation.”

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.

Please refer to Exhibit D for the requested submission.

Facility Construction

21. Referring to petition p. 10, what conditions will determine if cable trays or underground conduits will be used for wire connections? If cable trays are used, where would they be installed?

Underground conduits are used as the standard installation method for AC and DC wiring. Cable trays are an available option/alternative; however, they are not the preferred choice for the Project, as they will likely impede with grounds maintenance on the Site.

22. Referring to petition p. 10, what alternative methods may be used at the site to install racking posts?

Alternate anchoring methods for the racking system include ground screw penetration and ballast (no penetration) solutions. Posts will be driven using a track-mounted pile driver or excavator attachment. Where bedrock or ledge is encountered on a site, ground screws are typically used. Neither blasting nor use of ballast foundations are anticipated for the installation of any Facility-related infrastructure at the Site.

23. The proposed construction schedule has a majority of earth work occurring during winter months. Provide detailed winter work procedures for each phase/area that addresses methods of soil stabilization during installation of facility components and stabilization of stormwater control swales and stormwater detention basins.

Any significant areas of exposed soil that has been disturbed after mid-October will be temporarily stabilized by one of the following methods until such time that permanent stabilization measures and seeding can be applied (typically after mid-May):

1. Installation of an anchored erosions control blanket (erosion control blankets will not be installed on snow of greater than one inch in depth or on frozen ground, however);

2. Application of a straw mulch at a rate of four (4) tons per acre; and,
3. Application of wood chip mulch at a minimum depth of three inches (3”) on slopes less than 2:1. All wood chip mulch will be removed prior to resuming Site-grading, if required.

24. *Referring to petition p. 35, approximately what percent of the site development area is within Soil Group C?*

Approximately 48 percent (%) of the Site Development Area is within Hydrologic Soil Group C.

25. *Referring to petition p. 35, the narrative states groundwater was found in Test Pit 5 but later states no groundwater was found. Please clarify.*

Test pit 5 was conducted at the southerly end of the East Site Area to observe subsurface conditions as a possible area for stormwater management during preliminary Project design. As noted in Appendix D of the Stormwater Report (Appendix L of the Petition), however, no ground water was observed in the subject test pit.

26. *Referring to petition App. L, -Stormwater Report, App. D - the test pit data indicates groundwater was encountered in Test Pits #3 & #4 in the location of the east side stormwater basin. Due to the presence of groundwater, would the east stormwater basin be considered pond type basin that would retain water year round or during the Spring wet season? If so, how would standing water affect the function of the stormwater basin? The field note on Test Pit 3 recommended raising the basin by 2 feet. Provide more information as to basin design changes, if any, based on this recommendation.*

The Petitioner anticipates that the eastern stormwater basin (i.e., stormwater basin no. 2) will be dry for most of the year—except for some minor impoundment during short durations in the Spring and during rainfall events. Any minor ponding will have a negligible effect, however, relative to the overall storage for peak flow reduction. Based on the observed depth to groundwater in test pit 4, the bottom of the basin was raised to an elevation of 130.5 (as currently shown on the drawings) to provide approximately two (2) feet of separation to groundwater. The depth to groundwater as observed on the date of the test pits (i.e., March 31, 2020), approximates high seasonal groundwater that typically occurs in early spring.

27. *Would the sizing of the proposed swales and stormwater basins be designed to comply with DEEP’s proposed Appendix I revision to the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities?*

All of the proposed stormwater management controls for the Project are designed to comply with the CTDEEP’s guidance document, commonly referred to as *Appendix I*. Specific examples include outlet protection from the stormwater management basins

that are designed to dissipate runoff to non-erosive velocities, as well as the hydrologic analysis that was used for the Site (which complies with the criteria outlined under *Appendix I*, subsection (3) of “Design Requirements for Post-Construction Stormwater Management Measures”).

28. *Referring to petition p. 17 regarding the pre-application meeting with the DEEP Stormwater Division, please describe any recommendations, comments or concerns provided by the Stormwater Division.*

During the Petitioner’s pre-application meeting with the CTDEEP Stormwater Division,⁷ DEEP suggested, with respect to timeframes for Site-grading, that grading and stabilization activities at the Site occur prior to the construction of the PV racking and panel installation for the Facility. It is anticipated that construction of the East Site Area will commence in the Fall of 2020, and construction of the West Site Area will follow, during active periods of the golf course (since golfing will permanently cease at the West Site at the close of the 2020 season).

CTDEEP also requested that the Dam Safety Division review the Project; said review determined that the proposed stormwater basin No. 2 dam would be assigned a hazard classification of “AA”, which denotes that the structure has “negligible hazard potential.” As such, Greenskies is not required to obtain a dam construction permit from the CTDEEP Dam Safety Program. Moreover, in accordance with R.C.S.A. § 22a-409, no regulatory inspections of the dam are required.⁸ That said, however, once the dam is constructed, Greenskies must contact the CTDEEP Dam Safety Program to obtain a Dam Registration Form F and register the proposed basin/dam with the State. Please refer to Exhibit E for the CTDEEP Dam Safety Determination.

29. *How would site phasing be accomplished during construction? Would the East and West arrays be under construction at the same time? Would each array area be subdivided into smaller construction phases?*

Construction of the Project is expected to begin in late 2020. Initial work will include Site-preparation activities, such as, the installation of related erosion and sedimentation control measures for the Project. Official Notice to Proceed for Construction is anticipated in mid-to-late Fall (2020)—however, this is dependent upon if/when the Project obtains approval from the Siting Council and the CTDEEP, respectively. Work will begin at the East Project Area, during the off-season of golf course operations; installation of the West Project will follow (since all golf course operations will cease on that section after the 2020 season). The ground surface will be stabilized upon completion of each area of installation. Construction phasing will be performed in accordance with the requirements of the General Permit, as well as applicable stormwater management regulation(s) and guidelines.

⁷ The referenced pre-application meeting occurred on May 27, 2020.

⁸ Pursuant to R.C.S.A. § 22a-409, regulatory inspections are not required for dams classified as “AA”.

30. *Estimate the amount of cut and fill for the proposed project. If there is excess cut, will this material be removed from or deposited on the site property?*

Based on the current grading of the Site, the anticipated net cut (excess material) is 3,609 cubic yards (“CY”). Most of this quantity will occur on the West Site Area—resulting from the excavation for the proposed stormwater basin. However, raising the grades on the West Site by approximately four inches (4”) (the “West Site Adjustment”) results in a net cut of 1,841 CY. The East Site is nearly balanced.

Approximate grading quantities, based on the West Site Adjustment, are as follows:

Location	Cut (CY)	Fill (CY)	Net (CY)	
West Site	5,323	3,627	1,696	Cut
East Site	1,947	1,802	145	Cut
		Total	1,841	Cut

Regarding how the excess material will be used, based upon the Petitioner’s observations of the material(s) in the (West side) test pits, it likely represents high quality gravel. As such, the Petitioner suspects that the landowner may choose to sell or store same on-Site for future use.

31. *Referring to Site Plan LD, Sediment and Erosion Control Notes, #6 –does this note include the soil erosion control inspector as required by the DEEP General Permit?*

During Project construction, the Project’s design engineer will perform the sediment and erosion control compliance monitoring and reporting. A third-party consultant will then be retained by the Petitioner for plan implementation monitoring, in accordance with CTDEEP General Permit requirements.

32. *Referring to Site Plan LA-2, would any trees be removed to construct the northwest side of the stormwater basin?*

The clearing that is shown on Site Plan LA-2 is to reduce shading along the west side of the Facility’s array. Clearing is not required for construction of the stormwater basin.

33. *Referring to Site Plan LA-3, is it possible to relocate the southern fence and landscape strip approximately 10 feet northwards and creating an angled fence line at the southwest corner?*

Presently, the Project contemplates that the southern fence and landscape strip be located thirty (30) feet away from the southern PV array row, so to minimize shading of the southerly panels from shrub and tree plantings. Due to the location of the on-Site access road turnaround—which is located within the fence line at the southeast corner—

however, it is possible to relocate the fence ten (10) feet to the north without an angle at the corner. The landscaping in front of the southern fence would remain as designed, and it is possible to create an angle at the corner of the planting plan.

34. *Referring to Site Plan SD-3 is the “Mid Slope Berm” the same as the “Earth Diversion Berm” shown on Site Plan LA-2?*

The Mid Slope Berm depicted on the Site Plans is the same diversion swale shown on sheet SD-3; the nomenclature will be updated on the next revision or edition of the Site Plans.

35. *Referring to Site Plans SE-1 and SE-3, topsoil stockpile locations are shown. Would the topsoil result from removal of all soils within each development area or from only select areas? Please clarify.*

The referenced temporary topsoil stockpile locations are for the areas where topsoil will be removed—such as, within the area of the stormwater basins, the upland slope of the Westerly Site, or where mounds within the golf course are reduced. The removal of all topsoil within each Array Site, however, is not proposed.

36. *The topsoil application states topsoil will be spread to a depth of six inches. What specific areas will receive this amount of topsoil? What is the recommended depth (best management practice) of topsoil to ensure proper seed growth and subsequent root establishment for the selected seed mixes to be used at the site?*

As indicated in the Petitioner’s response to Interrogatory No. 35 above, topsoil removal will be limited to the areas of the stormwater basins, and the areas that need to be graded (shown on the Site Plans). To ensure a healthy growth of the pollinator seed mix proposed for the Site, a topsoil depth of six (6) inches is recommended.

37. *Would the concrete pads be poured on-site? If so, provide details for the cement truck washout station.*

Yes, the concrete equipment pads will be poured on-Site. See Exhibit F for the proposed cement truck washout station. Its proposed location falls under the means and methods of the Project contractor. The washout shall be located within the Project limits, upland and away from natural watercourses and wetland resource areas. Final location is subject to approval by Applicant’s representative or engineer.

38. *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?*

Recognizing that slopes within the proposed Facility-area are largely gentle (i.e., ranging between two (2%) percent and nine (9%) percent), with some areas of moderate slopes

(i.e., ranging between nine (9%) percent and fifteen (15%) percent) on the East Site, the Petitioner anticipates that runoff from the drip edge of the panels will have little or no effect on the Site's drainage patterns. Most of the slopes on the East Site will remain undisturbed, except within the area of the stormwater basin and certain isolated areas to reduce the mounds within the golf course.

The Petitioner similarly does not expect that channelization below the drip edge will occur. This is credited to the fact that there will be gaps (ranging approximately within one (1) to three (3) inches in size) between the upper and lower panels in each table; gaps between the panels themselves, measuring somewhere between 3/8th to half an inch (0.5") in size, as well as vertical gaps between the tables (typically, around one (2) to two (2) inches in size). Water will, therefore, run off the panels in two areas and along the vertical gaps.

Maintenance Questions

39. *What is the expected mowing schedule and minimum cutting height above grade for the selected solar field New England Conservation Wildlife seed mix?*

Greenskies will select a conservation/pollinator seed mix that will be low-growing—with most species having a maximum height of one (1) to three (3) feet. A flexible mowing schedule will then be developed, based on Site inspections during the growing season. Typically, a slow growing seed mix gets cut every other month.

40. *What is the cutting schedule for the grass lined stormwater basins? If the east stormwater basin is designed as a pond type basin, provide procedures for invasive species control.*

The cutting schedule for the vegetated stormwater basins is typically once per month—or every other month, during the April through October season, depending on Site conditions. The east stormwater basin is not designed as a pond; as such, the Petitioner does not have the referenced procedures.

41. *Would the modules require periodic cleaning? If so, what procedures/cleaning agents will be used?*

Due to regular precipitation and weather patterns in the Northeast, modules typically do not require periodic cleaning. If, however, an unforeseen incident or event were to occur that would make cleaning necessary, Greenskies would only use water for such cleaning purposes.

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?*

No, the Petitioner would store all replacement modules at the Greenskies' warehouse in North Haven, CT.

43. *Are high voltage signs required for any areas of the solar site?*

"High Voltage" signage is not necessary for the Project, because there will be no high voltage present on the Site. Accordingly, "High voltage" is above 69k volts, while "Medium Voltage" is between 600 volts and 69k volts. For the Facility equipment that utilizes Medium Voltage (e.g., the transformers and switchgear), the respective manufacturer is required to have the proper, required signage posted thereon, which includes Arc Fault warning signs.

Respectfully submitted,
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