

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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.

Petition No. 1410

September 17, 2020

Greenskies Clean Energy, LLC's Interrogatories to Proponents for Responsible Emplacement of Stonington Solar ("PRESS")

Please respond to the foregoing interrogatories no later than September 24, 2020, in accordance with the Connecticut Siting Council's Revised Schedule of August 27, 2020.

Several of these interrogatories refer to that certain Request for Party Status and Notice of CEPA Intervention and Request for Public Hearing that was submitted on behalf of Proponents for Responsible Emplacement of Stonington Solar ("PRESS" or "Intervenor") to the Connecticut Siting Council on July 31, 2020. For purposes of these interrogatories, that correspondence shall be referenced to as the "PRESS Request."

1. Aside from the three (3) officers named in the PRESS Request (i.e., Ms. Mary Ann Canning McComiskey, Ms. Rhandi Lee and Mr. John Pistolese), how many members belong to PRESS?
2. Please provide a list of all PRESS members.
3. Please provide a list of all PRESS members' respective addresses.
4. Please identify, by name and address, the PRESS members whose residences abut the proposed Project.
5. Are any members of PRESS professionally-certified engineer(s) and/or environmental expert(s)? If so, please identify said members, including his/her/their qualifications, as applicable.

6. Please confirm whether the following individuals are members of PRESS:
 - a. Mr. and Mrs. Randall and Lydia Miner
 - b. Ms. Rachel Miner-Dyer
7. Did Petitioner offer to meet with PRESS?
8. If the answer to Interrogatory No. 7 above is “Yes”, did such a meeting occur?
9. If the answer to Interrogatory No. 8 above is “No”, please explain why such a meeting did not occur.
10. Please identify any individual(s) and/or expert(s) PRESS retained and/or consulted in connection with the PRESS Request, including his/her respective qualifications, as applicable.
11. Has PRESS engaged any professionally-certified engineer(s) and/or environmental expert(s) to review Petition No.1410, including all narrative(s), appendices, and engineering plans/drawings contained therein?
12. If the answer to Interrogatory No. 11 above is “Yes”, please provide the name(s) of said engineer(s) and/or expert(s), including respective qualifications, as applicable.
13. Please identify the land uses, if any, that PRESS considers to be appropriate and/or suitable for the proposed Project Site.
14. Of the following land uses, which (if any) would PRESS believe to be appropriate and/or suitable for the proposed East Project Area¹:
 - a. Public utility substations;
 - b. Agriculture and the keeping and breeding of livestock (with a 200’ setback for manure storage and stables);
 - c. Duplex housing;

¹ For purposes of these Interrogatories, the term “East Project Area” shall be defined as that certain parcel bounded to the north by Elm Ridge Road, within a lot containing nine (9) holes of the golf course, a driving range, club house, small maintenance building, and a residence (Stonington Assessment Department Parcel ID 22-2-1), and the term “West Project Area” shall be defined as that certain parcel bounded by residential lots to the north, N. Anguilla Rd. to the east, open space and a residential lot to the south and Interstate I-95 to the west (Stonington Assessment Department Parcel ID 39-1-9).

- d. Public utility structures and facilities;
 - e. Communication and water towers;
 - f. Municipal facilities;
 - g. Public and private elementary and secondary schools;
 - h. Trailer parks and trailer camps (with 50 feet of buffer and 30 feet of screening);
 - i. Lumbering and mills;
 - j. Excavation operations;
 - k. Cemeteries;
 - l. Crematoriums and funeral homes
 - m. Congregate living facilities;
 - n. Hospitals; and/or
 - o. Convalescent homes
15. Does PRESS believe that a maximum height of 30 feet for a structure is fair and reasonable for structures that may be placed on the East Project Area?
16. Of the following land uses, which (if any) would PRESS consider to be appropriate and/or suitable for the proposed West Project Area:
- a. Agriculture and the keeping and breeding of livestock (with a 200' setback for manure storage and stables);
 - b. Public utility structures and facilities;
 - c. communication and water towers;
 - d. Kennels;
 - e. Lumbering and lumber mills;
 - f. municipal facilities; and/or
 - g. public or private elementary and secondary schools.
17. Does PRESS believe that a maximum height of 30 feet for a structure is fair and reasonable for structures that may be placed on the proposed West Project Area?
18. On page 3 of the PRESS Request, Intervenor states, in pertinent part, that:
 “Greenskies’ site plans and the assumptions included in those and related plans do not comply with the water quality standards of the State of Connecticut[.]”
 Which water quality standards of the State of Connecticut does the proposed project not comply with?
19. Does PRESS know the type(s)/amount(s) of chemicals that are used in connection with the golfing operations presently conducted on the Project Site? If so, please identify by type and amount.

20. Please identify, by type and amount, the chemicals that leach on the Project Site as a result of the golf course operations presently conducted thereon.
21. To the best of PRESS' knowledge, is the resulting contamination from a solar facility "less than," "equal to," or "greater than" that of the current golf course operation? Please include the reasoning/rationale for your answer.
22. Referring to page 3 of the PRESS Request, please provide calculations to support PRESS's contention that, "Petitioner's plans will not adequately control and treat stormwater."
23. Please provide calculations to support PRESS's assertion that, "the location and sizing of the single stormwater basin for each array is inadequate to protect the surrounding properties from impacts of stormwater runoff and do not comply with the requirements of CT DEP 2004 Storm Water Quality Manual." See PRESS Request, p. 3.
24. Please identify the waterbody(ies) that currently receive(s) runoff from the referenced "residential neighborhood...consist[ing] of more than 50 residences." See PRESS Request, p. 2.
25. On page 3 of the PRESS Request, Intervenor states: "Greenskies has also not presented any plan with respect to fire safety, and unless there is a water source at each site, it is likely that a fire involving the panels would quickly burn, releasing chemicals into the water."
 - a. How does PRESS believe that electrical fires should be extinguished in accordance with applicable standards and/or regulations?
 - b. If the answer to (a) above is that electrical fires should not be extinguished via the use of water, please explain the importance/relevance of having "a water source at each site."
 - c. Please qualify "quickly". Does PRESS have any knowledge/information concerning the (general) rate at which panels burn? If so, please provide such information, including the source(s) therefor.

Respectfully submitted,

Greenskies Clean Energy, LLC



By: _____

Lee D. Hoffman

lhoffman@pullcom.com

Amanda G. Gurren

agurren@pullcom.com

Pullman & Comley, LLC

90 State House Square

Hartford, CT 06103-3702

Ph. (860) 424-4315

Ph. (860) 424-4338

Fax (860) 424-4370

Its Attorneys

CERTIFICATION

I hereby certify that on this 17th day of September, 2020, the foregoing was delivered by electronic mail, in accordance with § 16-50j-12 of the Regulations of Connecticut State Agencies, to the following parties and intervenors of record:

Counsel for Douglas Hanson
Jonathan E. Friedler, Esq.
Michael S. Bonnano, Esq.
Geraghty & Bonnano, LLC
38 Granite Street
P.O. Box 231
New London, CT 06320
Phone: (860) 447-8077
jfriedler@geraghtybannano.com
mbonnano@geraghtybannano.com

Counsel for PRESS
Emily Gianquinto, Esq.
21 Oak Street, Suite 601
Hartford, CT 06106
emily@eaglaw1c.com