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December 22, 2020

Via Electronic Filing and Hand Delivery

Melanie Bachman, Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: PETITION 1421 - Petition of Bristol Solar One, LLC for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is Required for the Proposed Construction, Operation and Maintenance of a 3.25 +/- MW AC Solar Photovoltaic Electric Generating Facility Located at 399 Hill Street, Bristol, Connecticut

Dear Ms. Bachman:

Pursuant to the Siting Council's Decision and Order in this matter, I am enclosing two binders containing hard copies of the Development and Management ("D&M") Plan for this project on behalf of my client Bristol Solar One, LLC. In addition to the binders, we are providing two sets of rolled, full-sized plans (Exhibit A). Electronic versions of the documents will be e-mailed to you.

In addition to providing the D&M Plan to the Council, this letter will also serve as a follow up to the Petitioner's December 16, 2020 correspondence with the Council regarding the Bristol Solar One project. This letter will serve to confirm that with the change of control, Bristol Solar One LLC will abide by all applicable regulations as well as all terms and conditions found in the Council's approval of the Bristol Solar One project.

I hereby certify that copies of this letter have been provided to all parties and intervenors to this Petition as of this date. Should you have any questions concerning the foregoing, please contact me at your convenience.

Sincerely,


Lee D. Hoffman

Enclosures

Petition 1421
Development and Management Plan
Bristol Solar One Project

1.0 Introduction

Bristol Solar One LLC is submitting this Development and Management Plan for its solar project in Bristol, Connecticut. The Siting Council previously approved the project in Petition 1421 (“Petition”). This Development and Management (“D&M”) Plan shall provide the Council with greater detail regarding the project and its operations.

2.0 Need for and Elements of the D&M Plan

In its November 9, 2020 Decision and Order in the Petition, the Siting Council required that Bristol Solar One provide the Council with a Development and Management (D&M) Plan for the facility Bristol Solar One proposes to construct. The D&M Plan is designed to give the Council a better understanding of the final construction plans for the proposed project, including final layout, descriptions of additional civil work to be done at the site, and information regarding various submittals and correspondence with the Connecticut Department of Energy and Environmental Protection (DEEP) related to the Project. Specifically, the November 9, 2020 Decision and Order requires the following elements for the D&M Plan:

- a) A final site plan including, but not limited to, final solar panel layout, access roads, electrical interconnection, fence design compliant with the National Electrical Code, equipment pads and landscaping plan;
- b) Construction site plans that comply with the DEEP-approved Stormwater Pollution Control Plan that include, but are not limited to, site clearing, grading, site phasing, construction laydown areas, erosion and sedimentation controls, and details regarding construction-related environmental mitigation measures;
- c) Post-construction restoration plan for all disturbed areas of the site;
- d) Post-construction site maintenance and vegetation management plan;
- e) Details regarding co-use of the site for livestock;
- f) Contact information for construction contractor;
- g) ISO-NE interconnection determination, if applicable;

h) Plans to comply with DEEP site clearing restrictions for the eastern box turtle and bobolink, as specified in DEEP's NDDB Determination letter dated March 27, 2020;

i) A copy of the DEEP Stormwater Permit prior to the commencement of construction; and

j) Consultation with the DEEP Dam Safety program regarding permitting requirements, if any, for the proposed stormwater basins prior to site construction.

Each of these elements of the D&M Plan is addressed in turn.

3. Elements of the D&M Plan

(a) Final Site Plan

The Final Site Plans including final solar panel layout, access roads, electrical interconnection, fence design compliant with the National Electric Code, equipment plan, and landscaping plan are included in Exhibit A. As the Council can see from the attached drawings, several changes were made from the project as it was approved by the Council. In finalizing its design for the project, Bristol Solar One was able to reduce the number of modules that will be used at the site, and the new drawings reflect this reduction. In addition, the scope of the civil work was modified in order to accommodate issues highlighted by DEEP during DEEP's review of the stormwater design of the project, as well as to address commentary provided by Council members during their review and discussion of the Bristol Solar One project during their November 5, 2020 Council meeting.

Specifically, the following changes were made in the plans:

1. Bristol Solar One made the following changes to the solar modules for the project:
 - a. The proposed 390-Watt modules were changed to 400-Watt modules
 - b. The proposed 370-Watt modules were changed to 380-Watt modules
 - c. The total solar module count was reduced from 11,492 to 10,400 resulting in a total reduction of 1,092 solar modules
 - d. Revised Solar module counts are as follows:
 - i. 9,620 390-Watt modules were changed to 8,632 400-Watt modules
 - ii. 1,872 370-Watt modules were changed to 1,768 380-Watt modules
2. Due to the reduction in modules, adjustments were made to the western and eastern most stormwater basins. These adjustments will ultimately reduce the total earth work needed to support the stormwater management features. The following changes were made:
 - a. For stormwater management basins and swales
 - i. The cut volume was adjusted from 16,239 Cu. Yd to 9,728 Cu. Yd.
 - ii. The fill volume was adjusted from 2,282 Cu. Yd. to 1,492 Cu. Yd.
 - b. For berm grading
 - i. The fill volume was adjusted from 13,957 Cu. Yd. to 8,236 Cu. Yd.
 - c. Revised overall earth work
 - i. 9,728 Cu. Yd. of cut volume

- ii. 9,728 Cu. Yd. of fill volume
 - d. Additionally, this revised design was able to remove all the riprap for the entrance into the basins
- 3. The revised final site plans attached hereto as Exhibit A are designed to comply with the new requirements of DEEP's Stormwater General permit for Construction Activities, commonly referred to as "Appendix I."

(b) Construction Site Plans

As alluded to above, the Final Site Plans were modified, in part, to comply with the new requirements of DEEP's Stormwater General Permit for Construction Activities, which involved a change to some of the project's construction site plans. These changes are all reflected in the drawings found in Exhibit A. The changes to the construction plans were referenced above in section 3(a).

It should be noted that Bristol Solar One has resubmitted its application for a stormwater general permit to DEEP, based on the project's conversations with DEEP staff, and as discussed in greater detail in item (i) below.

(c) Post-construction Restoration Plan for all disturbed areas of the site

The post-construction restoration is shown on the Erosion and Sedimentation Control sheets, Grading Plans, and Detail Sheets included within the Final Site Plan and Construction Site Plan included in Exhibit A.

(d) Post-construction site maintenance and vegetation management plan

The Post-Construction Site Maintenance and Vegetation Management Plan is intended to outline the required work expected to keep the Facility operating as designed throughout its lifecycle.

Energy Production Monitoring

Bristol Solar One, LLC will utilize a continuous 24/7 remote monitoring system to provide alarm and performance data of the system. The monitoring system will include full site and inverter level production and alarms as well as site weather and irradiance data. Bristol Solar One, LLC will analyze performance data to make sure that the system is performing as designed and will be responsible for dispatching crews for system maintenance and repair related issues.

Inspections

Bristol Solar One, LLC will conduct inspections of the Solar Farm in accordance with the following schedule:

Table 1. Onsite Inspections Schedule

Task	Frequency
On-Site Ground Inspection	Monthly
Visual Array & Equipment Inspection	1x per year or per equipment manufacturer requirements
Mechanical and Electrical Inspections	1x per year or per equipment manufacturer requirements
Panel Cleaning	As Needed
Mowing and Trimming	In accordance with Livestock Grazing Plan. Mowing and trimming as needed.
Snow Removal	As needed
Perimeter Fence Inspection	1x per year
Stormwater Management System Inspection	1x per year or per engineer's stormwater management plan

Maintenance and Repairs

Bristol Solar One, LLC will handle all repairs identified during site inspections and through remote monitoring in a timely and efficient manner.

Long-term Stormwater Maintenance Plan

Bristol Solar One, LLC will provide maintenance in accordance with the approved stormwater maintenance plan produce by the engineer of record and as required by applicable DEEP regulations.

Vegetation Management Plan

The primary means of vegetation management will come in the form of the Livestock Grazing Program to be deployed by Bristol Solar One, LLC in partnership with Agrivoltaic Solutions LLC. In Summary, the sheep grazing program will be used to control vegetation at the project site in order to achieve the following:

- Prevent panel shading from vegetation,
- Control and remove invasive and unpalatable plant species,
- Avoid the growth of brush and woody species under the solar panels,
- Maintain a diverse forage population to support optimal sheep nutrition,
- Encourage flowering forb and plant species to maximize pollinator habitat,
- Optimize sequestered soil carbon through increasing top-soil amount and root matter,
- Control erosion.

The complete Bristol Solar One Grazing Program is attached as Exhibit B hereto.

(e) Details regarding co-use of the site for livestock

Bristol Solar One, LLC in partnership with Agrivoltaic Solutions LLC have developed a detailed grazing plan attached hereto as Exhibit B. The grazing plan provides details including but not limited to, vegetation maintenance, sheep rotational pattern, feed intake, and animal welfare.

(f) Contact information for construction contractor

The Construction contractor for Bristol Solar One, LLC:

VCP EPC, LLC

Steve DeNino

Chief Operating Officer

sdenino@verogy.com

860-982-4264

(g) ISO-NE interconnection determination, If Applicable

Bristol Solar One, LLC has conducted Distribution System Impact studies and has signed an interconnection agreement with Eversource Energy for the interconnection and operation of the Bristol Solar One facility. Bristol Solar One is currently not subject to any ISO-NE requirements. If Bristol Solar One is notified of an ISO-NE requirement, Bristol Solar One will fulfill that requirement to the best of its ability and provide and update to the Council in the unlikely event that this occurs.

(h) Plans to comply with DEEP site clearing restrictions for the eastern box turtle and bobolink, as specified in DEEP's NDDDB Determination letter dated March 27, 2020

Bristol Solar One will comply with the tree clearing / removal restrictions for the eastern box turtle and bobolink, as specified in DEEP's NDDDB Determination letter dated March 27, 2020. More detailed Environmental Notes are also included in the "Environmental Notes Resource Protection Measures" section of sheet GN-2 of the attached final site plans in Exhibit A.

(i) A copy of the DEEP Stormwater Permit prior to the commencement of construction

Bristol Solar One, LLC has modified the design and civil engineering plans based on feedback from Council members and conversations with DEEP staff. The revised plans comply with the DEEP's new construction stormwater general permit requirements. Bristol Solar One has resubmitted its stormwater permit application to the DEEP, and this resubmittal incorporates such changes. DEEP is

working through the resubmittal, and Bristol Solar One will provide the authorized Stormwater Permit prior to the commencement of construction.

(j) Consultation with the DEEP Dam Safety program regarding permitting requirements, if any, for the proposed stormwater basins prior to site construction.

Bristol Solar One has initiated consultation with the DEEP Dam Safety program and inquired as to any additional permitting requirements that may be necessary. Bristol Solar One will provide an update to the Council on this issue once it receives comments in response to its inquiries from DEEP.