



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

September 16, 2021

Kenneth C. Baldwin, Esq.

Christopher Y. Eddy, Esq.

Robinson & Cole LLP

280 Trumbull Street

Hartford, CT 06103-3597

kbaldwin@rc.com

ceddy@rc.com

RE: **PETITION NO. 1462** – Distributed Solar Operations, LLC and IKEA Property, Inc. notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes §16-50k(e), and petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 0.90-megawatt AC solar photovoltaic electric generating facility located at IKEA, 450 Sargent Drive, New Haven, Connecticut, and associated electrical interconnection.

Dear Attorneys Baldwin and Eddy:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than September 30, 2021. Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the September 30, 2021 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

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,

Melanie A. Bachman
Executive Director

C: Service List
MB/RM

Petition No. 1462
Distributed Solar Operations, LLC / IKEA Property Inc.
Interrogatories

Project Development

1. What is the estimated cost of the Project?

Energy Production

2. Is the project being designed to accommodate a future potential battery energy storage system? If so, where would it be located?
3. What is the anticipated capacity factor of the project? Would the capacity of the system decline over time? If so, estimate annual losses.
4. Would the impact of soft shading, such as air pollution or hard shading, such as bird droppings, or weather events, such as snow or ice accumulation, hail, dust, pollen, etc. reduce the energy production of the proposed project? If so, was this included in the proposed project capacity factor assumptions? Would any of these expose the solar panels to damage? If applicable, what type of methods would be employed to clear the panels of the bird droppings, snow and ice accumulation, hail, dust or pollen and at what intervals?
5. Would prey shells from shorebirds damage or otherwise affect the Project? How can such damage be prevented?
6. What is the estimated peak load of the IKEA store (in MW) relative to the proposed 0.9 MW AC peak output of the proposed solar facility? Would all of the energy output of the facility be used at the IKEA store?
7. Is there an already existing solar facility located on top of the IKEA store? Approximately how many MW does the existing facility contribute to the peak load of the IKEA store?
8. Referencing Drawing A-100, two PV systems are identified. Will these systems operate independently such that if an interconnection failure or maintenance shut down occurs at one, the other will continue to operate?
9. Why is a tilt of 5 degrees proposed for the panel arrays?

Site Components and Solar Equipment

10. What is the design wind speed of the solar panel mounts? How are the panels adhered to the mounts? What prevents the solar panels from separating from the racking or the foundation during high winds?
11. Are the solar panels attached to a steel roof? If so, is the steel roof pitched for sheet drainage or is runoff directed to drainpipes?

12. Submit a photograph/simulation or drawing that provides detail of the proposed canopy design.

Interconnection

13. Would any new overhead or underground connections to the local distribution system be required?
14. Should the Eversource system experience an outage, will the PV systems still be operational to provide power to the IKEA store?

Public Safety

15. Would the solar facility have a protection system to shut the facility down in the event of a fault within the facility or isolate the facility during abnormal grid disturbances or during other power outage events?
16. Would the project comply with the National Electrical Code, the National Electrical Safety Code and any applicable National Fire Protection Association codes and standards?
17. Would the proposed structural design and loading associated with the proposed canopy solar installations comply with the Connecticut State Building Code (or other codes) as applicable?
18. Would the Petitioner conduct outreach/training to local emergency responders in the event of a fire or other emergency at the site?
19. Describe procedures for solar array shutdown if required by emergency responders.
20. How would personnel access the top of the solar canopies?
21. What construction codes/standards are applicable to this installation to reduce or prevent damage to the structure/solar modules in the event of a vehicle fire under the canopy?
22. Describe how the project design allows for unencumbered access to emergency vehicles such as a fire truck or ambulance?
23. Would the proposed lighting plan (with its proposed foot-candle intensity) for under the proposed canopies comply with applicable codes?
24. Petition page 11 states there is a 1.5-2-inch gap between the solar panels that will allow stormwater to fall to the ground. Does this mean water will fall onto the parking area surface under the canopies through the gaps? Would this lead to concentrated water falling onto pedestrians or cars? How would sliding ice and snow be controlled?
25. Is the ground-mounted inverter elevated to reduce the potential for flood damage?

Environmental

26. Would construction of the proposed facility require an application for a DEEP Stormwater permit?

27. Were subsurface soils evaluated for hazardous contaminants? Would excavated soils require disposal at a hazardous materials facility?

Facility Construction

28. To what depth would the canopy column foundations be installed?

29. Where would the construction “staging area” be located?

Maintenance Questions

30. Would the design of the canopy cause snow/and or ice to accumulate and stay in place during prolonged incidents of cold weather? Is there a plan to remove snow/ice? Under what circumstances would snow be removed? Describe snow removal methods and site access.

31. What is the maintenance interval for the canopy support structures?

32. Would any chemicals be used or only water for solar panel cleaning? Would this maintenance activity have any impacts to water quality discharge to adjacent waterways?

33. Would the underside of the canopy arrays have the potential to act as shelters or as nesting areas for wildlife? Would nests/ droppings be periodically removed from the parking areas/columns?

34. What measures will be taken to prevent vandalism to the underside of the canopies; e.g., protection for wiring, graffiti, etc.?