



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

February 8, 2023

Lee D. Hoffman, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702
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RE: **PETITION NO. 1555** – Earthlight Technologies petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.9-megawatt AC solar photovoltaic electric generating facility located at Collins Aerospace, 1 Hamilton Road, Windsor Locks, Connecticut and associated electrical interconnection.

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than March 1, 2023. 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 March 1, 2023 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 Bachman
Executive Director

MB/rm

L.M.

c: Service List dated December 27, 2022

Petition No. 1555
Earthlight Technologies
Collins Aerospace
1 Hamilton Road, Windsor Locks
Interrogatories
February 8, 2023

Project Development

1. What is the estimated cost of the project?
2. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?
3. Have any of the Towns (Windsor, Windsor Locks, East Granby) and/or any abutters provided comments since the Petition was submitted? If yes, summarize the comments and how these comments were addressed.
4. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?

Proposed Site

5. In the lease agreement with the property owner, are there any provisions related to decommissioning or site restoration at the end of the project's useful life? If so, please describe and/or provide any such provisions.
6. Referring to Petition p. 17 and Figure 12, provide more information regarding the designations in the Legend.
7. Referring to Petition p. 17, Figure 12 and Appendix I – Public Outreach, portions of the host parcel and proposed facility site are part of a DEEP RCRA Corrective Action and Property Transfer Program. Has Earthlight Technologies contacted the LEP responsible for the remediation as recommended by DEEP? Has the DEEP Remediation Division provided any further recommendations on the site layout?
8. Referring to Appendix I – Public Outreach, has Earthlight Technologies confirmed that the site layout does not interfere with ongoing remediation efforts? Explain.

Energy Output

9. Is the project being designed to accommodate a potential future battery storage system? If so, indicate the anticipated size of the system, where it may be located on the site, and the impact it may have on Project power purchase agreements.
10. What is the anticipated capacity factor of the project? Would the capacity of the system decline over time? If so, estimate annual losses.
11. Would Earthlight Technologies participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?

12. Referencing Petition p. 11, does the Petitioner have a contract to sell the electricity and renewable energy certificates (RECs) it expects to generate with the proposed project? If so, to which public utility? If the electricity is to be sold to more than one public utility, provide the percentage to be sold to each public utility.
13. Referencing Petition p. 6, approximately what percentage of the power output would be used by Collins Aerospace for its manufacturing needs on an annual basis?

Site Components and Solar Equipment

14. What is the approximate size of the ballasts supporting the solar panels in the northern array area?
15. Referencing Petition Appendix C, lighting within the solar array is mentioned. Provide more information on the solar array lighting system.

Interconnection

16. What is the line voltage of the proposed electrical interconnection?
17. Is the project interconnection required to be reviewed by ISO-NE?
18. Referencing Petition pp. 7-8 and Figure 2, provide more information on the potential underground collection route. Where is the interconnection point?
19. Referencing Petition p. 8, what is the status of the interconnection application with Eversource?
20. Referencing Petition p. 11, provide more information as to how the facility will improve the reliability of Windsor Locks' electrical grid.

Public Safety

21. Would the project comply with the Connecticut State Building Code - 2022, National Electrical Code, the National Electrical Safety Code and any applicable National Fire Protection Association codes and standards including, but not limited to, NFPA Code Section 11.12.3?
22. Referencing Petition p. 8, by what methods can the facility be de-energized in the event of an emergency?
23. Referencing Petition p. 8, how would the mutual aid agreement between Collins Aerospace and the Town of Windsor Locks be modified to include the facility?
24. Would the Petitioner conduct outreach/training to local emergency responders in the event of a fire or other emergency at the site?

Facility Construction

25. Referencing Petition p. 9, what are the cut and fills for the project? If there is excess cut, where will the material be disposed of?

26. Would the southwest and southeast solar field areas require site grading? Provide more information regarding existing slopes and proposed slopes.
27. Referencing Petition p. 20, what Project areas have slopes approaching 18 percent? What work is planned in these areas? What additional erosion and sedimentation control measures would be undertaken in steep slope areas?
28. Submit photographs of the proposed solar facility site construction area with descriptive captions and/or a map identifying the locations of the photographs.
29. Referencing Petition Appendix L, were any provisions developed for the management of subsurface materials that may have been affected by manufacturing activities?

Environmental

30. Referencing Petition p. 19, what is the status of the sand barren habitat report?
31. Referencing Petition p. 19, what specific conservation measures for the Eastern pondmussel have been incorporated into the site design?
32. The Petition site plans specify a solar farm seed mix for the southern solar arrays. The Operations and Maintenance Plan references grass vegetation at the site. Submit a specification sheet for the proposed solar array seed mix.
33. The DEEP Natural Diversity Database (NDDDB) letter dated March 17, 2022 recommends that turf grass not be used within the solar array areas. Would the Petitioner be willing to seed the southern array areas with a pollinator mix? If yes, submit a pollinator seed mix specification sheet.
34. Referencing the DEEP NDDDB letter, how would Earthlight Technologies provide wildlife habitat and allow for connectivity of wildlife movement?
35. Identify the amount of tree clearing for each of the array areas.
36. Due to tree clearing at the site, was an assessment conducted for the northern long-eared bat, a federally and state-listed endangered species? Explain.

Maintenance/Decommissioning

37. Would replacement modules be stored on-site in the event solar panels are damaged or are not functioning properly? If so, where? How would damaged panels be detected?
38. Has the manufacturer of the proposed solar panels conducted Toxicity Characteristic Leaching Procedure (TCLP) testing to determine if the panels would be characterized as hazardous waste at the time of disposal under current regulatory criteria? If so, submit information that indicates the proposed solar modules would not be characterized as hazardous waste. If not, would the Petitioner agree to install solar panels that are not classified as hazardous waste through TCLP testing?