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July 14, 2023

**Via E-Mail and Hand Delivery**

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

**Re: Docket Number 514 - Glenvale LLC Application for a Certificate of Environmental Compatibility and Public Need for the Construction, Operation and Maintenance of a 4.0 MWAC Solar Photovoltaic Project at 56 River Road in Putnam, Connecticut**

Dear Ms. Bachman:

I am writing on behalf of my client, Glenvale LLC, in connection with the above-referenced Docket. While Glenvale LLC appreciates the opportunity afforded to it by the Council to submit a Brief in this Docket, the submittal of evidence in the Docket was fairly straightforward. Therefore, Glenvale does not believe that a Brief is warranted at this time.

However, there were a few issues that came up during the June 15, 2023 hearing that Glenvale believes may require some additional clarity. To that end, Glenvale is submitting this letter to the Council in lieu of a Brief.

The first issue, that was addressed both by Council staff as well as several Council members, was the issue of the location of the interconnection equipment, including a utility pole and pads for a ground-mounted meter and transformer. Glenvale is well-aware of the Council's desire to minimize visual impacts associated with the interconnection of such projects and therefore worked diligently with Eversource<sup>1</sup> to minimize such impacts to the extent possible. As Glenvale noted during the hearing, it is Eversource that drives how the interconnection is handled, including what interconnections require additional study, not Glenvale. Transcript, pp. 36 and 122.

As the hearing progressed (see Transcript, pp. 36-38 and 115-122), there were further discussions related to the location of the interconnection and associated equipment. As Glenvale indicated during the hearing, it is willing to work with Eversource as the interconnection is finalized,

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<sup>1</sup> The Connecticut Light & Power Company, d/b/a Eversource Energy ("Eversource").

however, Glenvale does not control that interconnection process; Eversource does. As Lisa Raffin indicated to the Council, Glenvale would be amenable to ascertaining whether any relocations or modifications to the interconnection are feasible, however, Glenvale can only do so if Eversource consents to such relocation/modification and such changes to not require a re-studying of the interconnection. As such, Glenvale respectfully submits that if the Council decides to grant Glenvale its Certificate, and if the Council remains concerned over this issue, then the Council should direct Glenvale to ascertain the feasibility of such relocation/modification and provide a report to the Council as part of Glenvale's Development and Management ("D&M") Plan for the project.

Similarly, as seen on pp. 56 and 57 of the Transcript, the Council had certain questions related to the specifications of the transformer that will be used at the project, particularly as those specifications relate to transformer oil storage and potential spill mitigation. As indicated during the hearing, Glenvale has yet to specify exactly which transformer will be used, so it did not have that information available for the Council to review during the hearing and will not have such information until a transformer is selected. Accordingly, Glenvale would suggest that if the Council approves Glenvale's Application, and if the Council still wishes to receive such information related to the project's transformer, that the Council require that Glenvale provide such information to the Council as part of its D&M Plan as a condition for approval.

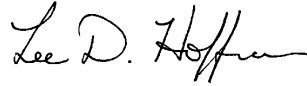
In addition to the transformer issue, the Council inquired of Glenvale related to its emergency action plan and the trackers that would be used by the project. The emergency action plan that Glenvale provided the Council was merely an indicative, sample plan and not a final plan for the project. Transcript, pp. 65-66. The Council indicated that such a plan could be included as part of the project's D&M Plan if Glenvale's Application is approved. Transcript, pp. 67-68. Glenvale believes this to be the correct course of action with respect to the emergency action plan. The Council also had several questions regarding the specifics of the trackers to be used by the project. Transcript, pp. 57-60, 67, 69-70. As was indicated during the public hearing, Glenvale would be amenable to providing additional information on the trackers, once specific trackers are selected, as part of the D&M process for the project, assuming the project is approved. Transcript, p. 67.

Finally, there were several areas of questions during the hearing regarding the phasing of construction and the construction of specific stormwater control features for the Project. The Council's long-standing interest in successfully addressing such issues is well known, and Glenvale appreciates that the project needs to be constructed in accordance with all stormwater requirements. To that end, Glenvale reiterates what it said on pp. 10 and 11 of its Application, namely that the project will be constructed in accordance with the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities ("General Permit") issued by the Connecticut Department of Energy and Environmental Protection. This includes, but is not limited to, the phasing of the construction of the project will be done in accordance with the requirements of the General Permit.

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Glenvale thanks the Council for its consideration of Glenvale's project. Should you have any questions concerning this submittal, please contact the undersigned at your convenience.

Sincerely,

A handwritten signature in black ink that reads "Lee D. Hoffman". The signature is written in a cursive style with a large, stylized "L" and "H".

Lee D. Hoffman