



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

April 4, 2023

Lee D. Hoffman, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702
lhoffman@pullcom.com

RE **DOCKET NO. 514** – Glenvale, LLC d/b/a Glenvale Solar application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 4.0-megawatt-AC solar photovoltaic electric generating facility located at 56 River Road, Putnam, Connecticut and associated electrical interconnection.

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 25, 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 April 25, 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

c: Service List dated March 8, 2023

MAB/RM

Docket No. 514
Pre-Hearing Interrogatories
Set One

April 4, 2023

Project Development

1. Has the Town of Putnam and/or any abutters provided comments to Glenvale, LLC d/b/a Glenvale Solar (Glenvale) since the application was submitted to the Council? If yes, summarize the comments and how these comments were addressed.
2. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
3. What is the estimated cost of the Project?
4. If the facility operates beyond the terms of the SCEF Agreement, will Glenvale decommission the facility or seek other revenue mechanisms for the power produced by the facility?
5. Would Glenvale participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?
6. 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?
7. Referring to Application Exhibit C- the January 17, 2023 letter from the Town of Putnam – item 3 states: *Based on recent input from Glenvale, a property boundary modification will most likely be achieved by the use of a boundary line adjustment between 56 River Road and an adjacent parcel, requiring no action by the Planning Commission.* Provide more information as to what property boundary modification is required for the Project.

Proposed Site

8. Would the site be leased or subject to a purchase option? If the site would be leased at any time during site construction activities, are there any provisions in the lease agreement with the property owner related to decommissioning and/or site restoration? If so, please provide any such provisions.
9. Provide a copy of any lease agreement or land purchase option per Connecticut General Statutes (CGS) §16-50o.
10. Is the site parcel, or any portion thereof, part of the Public Act 490 Program? If so, how does the municipal land use code classify the parcel(s)? How would the project affect the use classification?
11. Has the State of Connecticut Department of Agriculture purchased any development rights for the project site or any portion of the project site as part of the State Program for the Preservation of Agricultural Land?
12. Provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar field perimeter fence.

13. Referring to Application page 3 and Exhibit A, Site Plan OP-2, the abutting property to the east is owned by the same landowner of the host parcel and is marked as the "Airline Rail Trail." Is this area developed and open to the public? If yes, how is public access provided?
14. Referring to Application Exhibit A, Site Plan SP-1, two concrete pads are shown in the northwest corner of the site, adjacent to the proposed access road. What equipment will be installed on the pads? Provide dimensions of the equipment. What are the noise characteristics of the equipment?
15. Referring to Application Exhibit A, Site Plan OP-1, was an access road farther to the south on River Road considered to create a larger buffer to the abutting property at 34 River Road? Why was the proposed location of the access road selected?
16. Referring to Application Exhibit A, Site Plan OP-1, the stormwater from most of the site would drain into three swales which are directed into one large detention basin on the south side of the site. Was a stormwater design considered where two or three detention basins, served by shorter swales, were located around the site perimeter?

Energy Output

17. Is the project being designed to accommodate a potential future battery storage system? If so, please indicate the anticipated size of the system, where it may be located on the site, and the impact it may have on the SCEF Agreement.
18. What is the anticipated capacity factor of the project? Would the capacity of the system decline over time? If so, estimate annual losses.
19. What, if any, electrical loss assumptions have been factored into the output of the facility?
20. If one section of the solar array experiences electrical problems causing the section to shut down, could other sections of the system still operate and transmit power to the grid? By what mechanism are sections electrically isolated from each other?
21. Pursuant to CGS §16-50p(c), a public benefit exists when a facility is necessary for the reliability of the electric power supply of the state or for the development of a competitive market for electricity. Public benefit exists if the Council finds and determines a proposed electric generating facility contributes to forecasted generating capacity requirements, reduces dependence on imported energy resources, diversifies state energy supply mix and enhances reliability. Please respond to the following:
 - a) Would the proposed facility be necessary for the reliability of the electric power supply of the state? Explain why or why not.
 - b) Would the proposed facility be necessary for the development of a competitive market for electricity? Explain why or why not.
 - c) Would the proposed facility contribute to the forecasted generating capacity requirements? Explain why or why not.
 - d) Would the proposed facility reduce dependence on imported energy resources? Explain why or why not.
 - e) Would the proposed facility diversify the state's energy supply mix? Explain why or why not.
 - f) Would the proposed facility enhance reliability? Explain why or why not.

Site Components and Solar Equipment

22. Is the wiring from the panels to the inverters installed on the racking? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation maintenance, or chewing animals?
23. Would the single axis tracker system move along the east-west or north-south axis? Submit a specification sheet of the tracking system.

Interconnection

24. Is the project interconnection required to be reviewed by ISO-NE?
25. Referencing Application page 8, an abutting property owner expressed concern about electromagnetic safety. How was this resolved?
26. What are the industry Best Management Practices for Electric and Magnetic Fields at solar facilities?

Public Safety

27. Would the project comply with the current Connecticut State Building Code, 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?
28. In the event of a fire or emergency, describe procedures that will allow emergency responders to shut down the facility.
47. In the event of a brush or electrical fire, how would Glenvale mitigate potential electric hazards that could be encountered by emergency response personnel? What type media and/or specialized equipment would be necessary to extinguish a solar panel/electrical component fire?
29. Are there are private water wells in the vicinity of the site? If yes, what methods would be used during construction to protect the wells and/or water quality from potential impacts related to post driving/drilling?
30. Application p. 8 states the inverter was relocated 366 feet further into the site to move it away from a nearby residence and property; however, page 14 states the inverter is 137 feet from the property line. Clarify.
31. What noise-generating equipment would be installed at the site? Would operation of the proposed facility meet the applicable Department of Energy and Environmental Protection (DEEP) Noise Standards at the nearest property boundary?

Environmental

32. Referring to Application p. 12, has the State Historic Preservation Office provided comment on the project? If so, provide a copy of the response.

33. Referring to Application pp. 9-10, does Glenvale intend to graze sheep at the site? If yes, would an on-site water source and outbuildings be necessary? What is the status of discussions with local sheep farmers?
34. Referring to Application Attachment C, in January 6, 2023 email correspondence to the Town there is reference to “a sheep grazing function which would require drilling a well.” Explain.
35. If temporary or permanent electric fence is used at the site to create defined pasture areas for livestock within the solar field, what types of safety measures are in place to protect the public and emergency response personnel from electric fence shock hazards?
36. Referring to Application Attachment G, Appendix C, in the Department of Agriculture’s August 16, 2022 material impact to prime farmland soils determination, DOAg states it is based on:
“1) The entirety of the farmed acres will be brought out of production by the project and 2) Glenvale Solar has not provided our Department with concrete plans or commitments to develop significant agricultural co-uses on the project site.” What agricultural co-uses were recommended by DOAg?
37. What best management practices could be employed to allow for the future restoration of on-site prime farmland soils?
38. Referring to Application Exhibit G- Environmental Assessment p. 19, it states the sediment traps will be removed and stormwater basins will be installed. Describe the sediment trap removal process and ground restoration in the sediment trap area(s).
39. Referring to Application Exhibit G- Environmental Assessment p. 22, the weblink for footnote 12 does not connect. Revise to include a connecting weblink.
40. What effect would runoff from the drip edge of each row of solar panels have on the site drainage patterns? Would channelization below the drip edge be expected? If not, why not?
41. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features shown (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

Facility Construction

42. Has Glenvale met with the DEEP Stormwater Division and/or Dam Safety Division regarding permitting requirements for the proposed stormwater basins? If yes, when? Describe any recommendations, comments or concerns about the project provided by the Stormwater Division and/or Dam Safety Division, including, but not limited to, water quality impacts from animal waste related to sheep grazing on the site.
43. Application Site Plans EC-3 and EC-4 show construction occurring in two phases. Would tree clearing and grubbing be conducted in phases or all at once? What construction activities would be completed in Phase 1 before Phase 2 begins?
44. Application Site Plans EC-3 and EC-4 show sediment trap outfalls directing water into perimeter silt sox. How will stormwater outflows be controlled to avoid silt sox overtopping or breaching during heavy rain events?
45. What is the minimum road width required for post-construction use? Does this include emergency response vehicles?
46. Has a comprehensive geotechnical study been completed for the site to determine if site conditions support the overall Project design? If so, summarize the results. If not, has Glenvale anticipated and designed the Project with assumed subsurface conditions? What are these assumed conditions?
47. Would the post-construction stormwater detention basins retain water during the Spring due to an elevated water table? If yes, how would water from the elevated water table affect the stormwater storage capacity of the basin? Would larger basins be required to compensate for lost storage capacity?

Facility Maintenance/Decommissioning

48. Would Glenvale store any replacement modules on-site in the event solar panels are damaged or are not functioning properly? If so, where?
49. 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? Submit laboratory test results that indicate the proposed solar modules would not be characterized as hazardous waste. If test results are not available, and if the project is approved, would Glenvale install solar modules that are not classified as hazardous waste through TCLP testing?