

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

Brookfield Husky Solar, LLC d/b/a Verogy application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 50-megawatt-AC solar photovoltaic electric generating facility and associated equipment on 9 parcels generally located east and west of Sterling Road (Route 14) along the Plainfield municipal boundary in Sterling, Connecticut; north of Sterling Hill Road along the Sterling municipal boundary and west of the intersection of Sugar Brook Road and Black Hill Road (Route 14) in Plainfield, Connecticut and associated electrical interconnection	Docket No. 550
	July 7, 2026

PRE-FILED TESTIMONY OF BRADLEY PARSONS

I. INTRODUCTION

Q. Please state your name, relation to the Applicant (Brookfield Husky Solar, LLC), and business address.

A. My name is Bradley Parsons, and I have been the Director of Engineering & Utility at Verogy, since June 07, 2021. I manage certain aspects of the proposed project for the Applicant. My business address is 124 LaSalle Rd., 2nd Floor, West Hartford, CT 06107.

Q. Please provide a brief description of your education, work experience, and any licenses or certifications you hold.

A. I hold a Bachelor of Science degree in Civil Engineering from the University of Hartford and have over twenty years of experience in the design and construction of infrastructure projects. I am a licensed Professional Engineer in the states of Connecticut, Rhode Island, and Massachusetts.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony in this proceeding is to explain the revised site plans submitted as Late-Filed Exhibit 4, Late-Filed Exhibit 7 and Pre-Filed Testimony Exhibit 1 and to explain the different tradeoffs in each for the benefit of the evidentiary record.

II. BROOKFIELD HUSKY SOLAR DESIGN APPROACH

Q. Please provide a brief description of the current uses of the Project site.

A. The Project site is a mix of areas used for farming, recent timber harvesting operations and gravel mining. The Bellavance Property consists of farm fields in the southern portion, a large, wooded wetland on the east and west sides, while the center of the property is a wooded area that was previously timbered and is bisected by an existing Eversource distribution line. As explained in the response to Interrogatory 30, the forested areas where the proposed array is going on the Bellavance Property were completely harvested for timber between 2009 to 2017. The Corson Property is a gravel mining pit. The Sugar Brook Property, located approximately 5 miles to the west of the Bellavance and Corson Properties, is entirely wooded, outside of access roads and existing transmission line infrastructure.

The photo log submitted as Exhibit E included with the Responses to the Connecticut Siting Council's ("Council's") first set of Interrogatories shows the diverse nature of the existing land uses in each proposed area (reprinted for ease of reference):

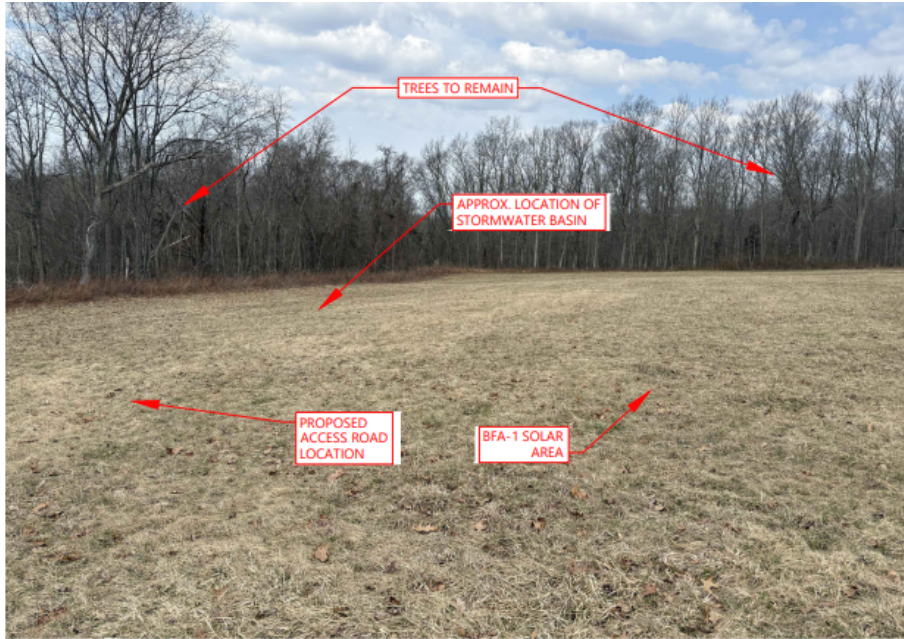


Photo 4
View North to Stormwater Basin

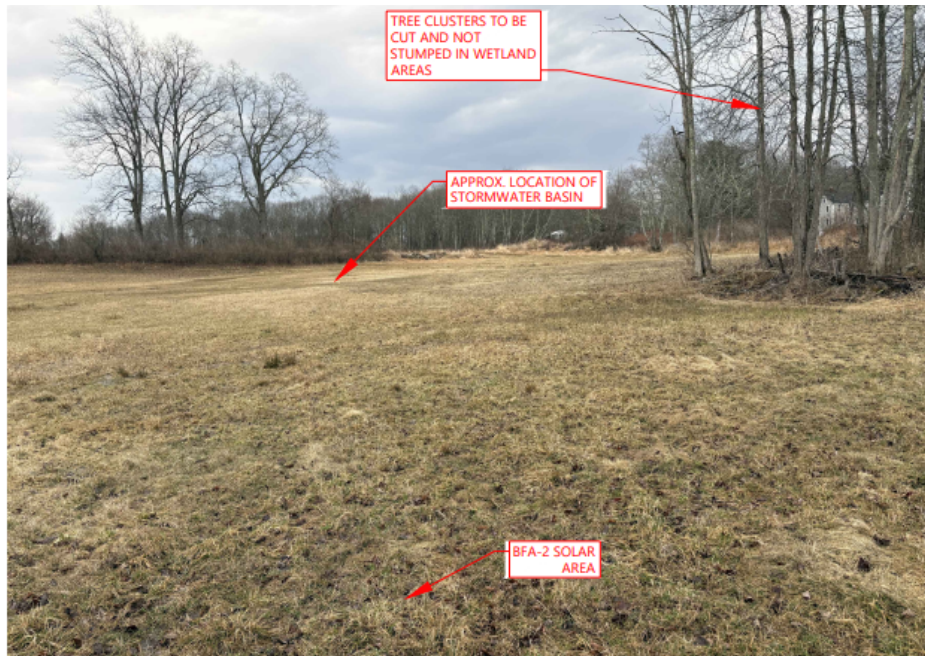


Photo 8
View Northwest towards Stormwater Basin





Photo 13
View South within BFA-3



Photo 17
View East into Corson Array



Q. Please provide a brief overview of the proposed Brookfield Husky Solar Project.

A. As originally proposed, the site would span approximately 210 acres and provide a total output of 50MW AC. As explained in the Response to Interrogatory 8, while the Project's Power Purchase Agreements may allow for a small decrease in facility size to 45MW AC, the facility is limited to 50MW AC by the Large Generator Interconnection Agreement. Given the historical and active uses of the site, in combination with these generation requirements, the Brookfield Husky Solar Project design must strike a balance. Specifically, the public's need for new renewable energy generation should be balanced with the consideration of siting such generation on different land types, limiting potential impacts to the site's environmental resources, allowing continued agricultural use, and establishing engineering constraints to minimize overall impacts while still meeting the project's energy requirements.

The Council is aware that Connecticut has established strong renewable energy policies aimed at promoting renewable energy generation while balancing environmental protection, electric reliability, and affordability. Some of these state policies include preserving core forest and prime farmland, however there are tradeoffs to protecting one versus the other. If the state were to take the stance that no renewable energy projects could cut down trees, projects would be forced to be developed on farmland, which would more severely impact a resource that the state is seeking to preserve. There is always the argument that solar projects should only cover our parking lots, but the costs of those projects and the reduced energy production will not meet Connecticut's affordability, climate and reliability goals, especially in a time when the state has seen increased electric rates. For the first time in many years, the region's grid operator is forecasting that the

region's annual electricity consumption will increase approximately 9% over the next decade, representing a steady increase in regional electricity use through 2035.¹

One of the key aspects of the Council's work is the inherent balance the Council consistently strikes in the decisions it reaches. The Brookfield Husky Solar project achieves that balance by addressing competing objectives, including minimizing impacts to forest and farmland habitat, while also making use of a former gravel pit, to develop renewable energy that our region undoubtedly needs.

III. BROOKFIELD HUSKY SOLAR HISTORICAL USE AND EXISTING VERNAL POOLS

Q. Please provide a brief description of the existing tree line changes found on the revised site plans.

A. As previously discussed in the narrative submitted with the initial filing on February 20, 2026, tree clearing activities have taken place for quite some time on the Bellavance property. To ensure that the revised site plans reflect the best available information, the Applicant updated the underlying maps using the latest Nearmap aerial images available as of April 8, 2026.

This most recent available imagery shows significant landowner clearing has taken place north of BFA-2. Specifically, the areas around vernal pools B13, B14 and up to the edge of B5 and B8 are clear of trees.² A photo of the vernal pool B13 shows that the areas around were previously cleared.

¹ See *ISO-NE forecast shows steady increase in regional electricity use through 2035*, available at <https://isonewswire.com/2026/05/01/iso-ne-forecast-shows-steady-increase-in-regional-electricity-use-through-2035/>; see also *2026-2035 Forecast Report of Capacity, Energy, Loads, and Transmission (CELT Report)*, available at https://www.iso-ne.com/static-assets/documents/100035/2026_celt.xlsx.

² See Late-Filed Exhibit #1; sheets PV-C2.02 & PV-C2.03 which shows the updated tree line.

While this information was contained in the original filing, it was not a focus of the filing. Rather, that information is located on Page 154 of the Appendix Q Wetland and Vernal Pool Documentation provided to the Council in February and is reprinted for ease of reference below.

		PHOTOGRAPHIC LOG	
Client Name: Husky Solar		Site Location: Plainfield/Sterling, CT	Project No: 43254.00
Photo No.: 11	Date: 4/24/2023		
Description: Photo of vernal pool B13.			

The revised site plans better demonstrate this pre-existing clearing for the benefit of the record and the continued evidentiary hearing.



Q: How have these clearing activities affected the vernal pools present in BFA-1 and BFA-2?

A: Importantly, many of the vernal pools on the BFA-1 and BFA-2 appear to have been created as a result of this previous clearing that has taken place on site. This was confirmed by VHB in 2023 (see Appendix Q, Pages 120-130) and affirmed with the most recent aerial imagery. The following are some of the descriptions of the vernal pools from Appendix Q:

- Pool B4 is located within an area of logging ruts with no inlet/outlet.
- Pool B6 is located within a stump pit with no inlet/outlet.

- Pool B13 is located within a rocky pocket created due to boulder removal.
- Pool B19 is located in a depression left from a treefall and has a temporary inlet/outlet and a leafy/silty bottom.
- Pool B26 is located in a depression left from a treefall in a wet meadow and has a temporary inlet/outlet and a leafy/silty bottom.
- Pool B29 is located in a tire rut in a shrub wetland and has no inlet/outlet and a leafy bottom.

Below is a photo of Pool B4 and the area around the pool.³

		PHOTOGRAPHIC LOG	
Client Name: Husky Solar		Site Location: Plainfield/Sterling, CT	Project No: 43254.00
Photo No.: 7	Date: 4/21/2023		
Description: Photo of vernal pool B4.			

As summarized in the Response to Interrogatory 129, several vernal pools exist in depressions created by logging and farming practices as shown in Appendix Q. Due to the shallow depressions and limited water columns (less than 8 inches), these pools would not support consistent seasonal breeding and development for wetland obligate amphibians. Rather, these areas would only provide species viability in extremely wet conditions.

³ See Appendix Q – Wetland and Vernal Pool Documentation, Page 152. (reprinted for ease of reference)

Q: What protection measures are proposed with regard to the vernal pools?

A: The following measures will be implemented as part of the project:

- The revised site plans will relocate proposed Stormwater Basin #3B to reduce the potential for hydrologic and ecological fragmentation of these habitats. Pre-Filed Testimony Exhibit #1 shows the approximate relocation of the proposed basin.
- The revised plans ensure that no tree cutting, vegetation clearing, or grading will occur within 100 feet of any vernal pool. Solar panels and associated infrastructure will be adjusted or relocated as necessary to fully avoid disturbances within this buffer, except for limited clearing required inside 100-foot vernal pool buffers on the Sugar Brook property associated with the transmission interconnection, primarily for electrical clearances.
- Any depressions/ruts that are created as a result of Project construction will be properly filled and stabilized, in an effort to avoid additional creation of decoy pools within the 750-foot critical terrestrial habitat zone around the existing vernal pools.
- The Project will employ a wildlife-passable fence and ground-mounted solar panels rather than continuous paved surfaces or buildings, which will facilitate continued wildlife movement on the site. Much of the project area will remain vegetated and pervious, maintaining connectivity and supporting terrestrial habitat functions surrounding the vernal pools.
- The Project will continue to discuss final recommendations with CTDEEP NDDDB, and intends to adhere to applicable time-of-year restrictions and seasonal limitations on clearing and construction activities.
- Silt fence will be installed prior to the beginning or after completion of the breeding season as applicable.

- Consistent with best practices, environmental monitoring will be implemented during construction, and specifically during the breeding season, to ensure compliance with the protection efforts.

IV. THREE SETS OF REVISED SITE PLANS

Q: Please explain how the Applicant approached the revised site plans.

A: Following the June 4, 2026 Evidentiary Hearing, Brookfield Husky Solar undertook a comprehensive review of the proposed site plans to ascertain what additional adjustments to the project could be made while still achieving the project objectives. The result of this process was several proposed redesigns of the project with site plan revisions that reflect these options. Given that the project is limited in the amount of capacity reduction it can successfully undertake, not all of these proposed revisions can be undertaken together. However, these proposed changes may provide the Council with a reasonable path forward for approval.

There are three proposed revisions that we believe will further reduce environmental impacts from the project without unduly burdening the project's proposed capacity. The first revised site plan has been updated to reflect the removal of BFA-2 in its entirety in accordance with the Response to Late-Filed Exhibit 4. As requested by the Council, the Applicant has also provided a limited revised site plan in the Response to Late-Filed Exhibit 7. Finally, the Applicant has also prepared Pre-Filed Testimony Exhibit 1 which keeps BFA-2 but reduces clearing in the northern portion of the site (in BFA-4).

Q. Please provide a brief description of the revisions contained in Late-Filed Exhibit 4.

A. The main change contemplated in the Late-Filed Exhibit 4 site plan alternative is the removal of all panels in BFA-2 as suggested by the Council. As discussed above, in order to remove panels from BFA-2, if undertaken, would create decreased interrow spacing in BFA-1, BFA-3 and BFA-4, and would require revision of some of the panels to fixed-tilt instead of tracking. The revisions to this plan does not reduce the amount of tree clearing required.

The following is a list of additional revisions made to this site plan, should the Council determine this option to be the appropriate course of action, in comparison to what was originally filed for ease of reference:

BFA-1

- Decreased interrow spacing between modules from 15.0 feet to 13.8 feet
- Shifted the southeast fence corner 120 feet to the west to reduce visibility to abutter to the east

BFA-2

- Removed in its entirety
- Only interconnection from BFA-1 will go through this area

BFA-3

- Converted approximately 40% of the south and eastern tracker area to fixed tilt
- Decreased interrow spacing between fixed tilt modules from 16.0 feet to 13.8 feet
- Shifted the northern fence line approximately 50-85 feet to the north closer to the distribution easement. The fence is now located 15 feet from the existing Eversource distribution easement
- Shifted Stormwater Basin #3B approximately 280 feet to the east. This eliminates clearing directly south of vernal pools B10, B11, and B12.
- Shifted Fence line on the western and southern sides to bring modules up to the 100 foot wetland buffer
- Any disturbance within a 100 foot vernal pool buffer has been removed

BFA-4

- Decreased interrow spacing between fixed tilt modules from 16.0 feet to 13.8 feet
- Shifted the southern fence line approximately 40-70 feet to the south closer to the distribution easement. The fence is now located 15 feet from the existing Eversource distribution easement
- Removed modules in the northeast corner of the project to reduce visibility to property owners in the area

Corson Property

- No changes. The proposed spacing is already at the minimum possible amount due to shading requirements.

Q. Do the revisions in interrow spacing and buffers comport with best practices?

A. Yes. Based on the Town of Sterling's Inland Wetlands and Watercourses Regulations, effective March 29, 2012, and the Town of Plainfield's Inland Wetlands and Watercourses Regulations dated September 1, 2022, both identify an Upland Review Area buffer of 100 linear feet measured horizontally from the boundary of any wetland or watercourse as a regulated area. The proposed interrow spacing for the fixed tilt panels is also consistent with current best practices for recent Connecticut projects.

Q. Can you explain why the revisions contained in Late-Filed Exhibit 4 propose additional fixed-tilt panels instead of tracking panels?

A. The change to fixed-tilt panels instead of tracking panels allowed for the project to maintain its system size as more fixed-tilt panels can fit in an area than trackers. As many of the trackers as possible were kept to maintain the added energy production benefits that they afford the Project.

Q. Please explain why this plan shifts Stormwater Basin #3B approximately 280 feet to the east.

A. Even though the area in the vicinity of the stormwater basin had been previously impacted by landowner activities, Late-Filed Exhibit 4 shifts the stormwater basin to maintain connectivity between the vernal pools to the north and south of the previous location.

Q. Can the interconnection further shift to avoid locating in BFA-2?

A. No, the existing properties along the road prevent the ability to shift the interconnection to a different parcel. In short, there is no path to interconnecting BFA-1 without traversing wetlands in this alternative.

Q. Please provide a brief description of the revisions contained in Late-Filed Exhibit 7.

A. The Council requested a revised site plan for BFA-1 that removes solar panels from the wetland areas and provides for a wetland buffer to the maximum extent possible, with a notation of the energy output of the revised array. The plan shifts the fence line so that it is located approximately 10 feet off the wetlands. This resulted in the removal of panels on the south, east, and west sides of the array resulting in shrinking of the size by approximately 60%. For all of these reasons, including the minimum buffer to wetlands, we do not recommend this option.

Q. Could the revisions contain in Late-Filed Exhibit 7 be incorporated into Late-Filed Exhibit 4?

A. No, the reduction in size and the isolation of such a small array so far from the rest of the project does not make incorporating Late-Filed Exhibit 7 changes into the Late-Filed Exhibit 4.

Q. Please provide a brief description of the revisions contained in Pre-Filed Testimony Exhibit 1.

A. While not specifically requested by the Council, the Applicant prepared this additional site plan to show a revised site-wide balancing approach. This site plan focuses on mitigating potential impacts to wetlands associated with the arrays BFA-1 and BFA-2. As noted in the response to Interrogatory 69, a Jurisdictional Determination was submitted to the U.S. Army Corps of Engineers (“USACE”) for these wetlands. The wetland boundary that was submitted for review and approval to USACE proposes the majority of the wetlands within BFA-1 and BFA-2 designated as state wetlands and not federal wetlands. On June 17, 2026 the project received email correspondence from USACE stating that they do not anticipate any changes to the proposed federal wetland boundary.⁴ A final determination from the USACE will be provided to the Council when it is received.

Q: Is there a practical difference between state and federal jurisdictional wetlands in this location?

A: Yes, and both types of wetlands are present on the Project site. Federal and state wetland regulations differ primarily in jurisdictional scope and permitting authority. Federal protections are governed by the Clean Water Act, which limits jurisdiction to wetlands with a continuous surface connection to navigable waterways, and identifies wetlands based on 1) wetland soils, 2) hydrophytic vegetation, and 3) wetland hydrology.⁵ Inland state wetlands, in contrast, are generally regulated based on soil type rather than water connectivity, and rely principally on the presence or absence of features in the soil profile associated with soil development under saturated

⁴ See Response to Interrogatory 127.

⁵ See Appendix Q at Page 7.

conditions. The state wetlands in this location are present in existing farm fields that have been historically repeatedly impacted by farming activities.

Q: How does the likelihood of state-jurisdictional wetlands in BFA-1 and BFA-2 affect the revised site plans in Pre-filed Testimony Exhibit 1?

A: Again, Pre-Filed Testimony Exhibit 1 was designed to focus on eliminating potential project impacts the federal wetlands, pending final approval of the Jurisdictional Determination by USACE. By keeping BFA-1 and BFA-2 but limiting minor impacts to state wetlands this site plan can reduce the amount of clearing to core forest in the northern portion of BFA-4.

Q: Please provide an overview of the revisions to the site plans in Pre-filed Testimony Exhibit 1.

A: The following is a list of revisions that were made to this site plan in comparison to what was submitted.

BFA-1

- Decreased interrow spacing between modules from 15.0 feet to 13.8 feet
- Shifted the southeast fence corner 120 feet to the west to reduce visibility to abutter to the east

BFA-2

- Decreased interrow spacing between modules from 15.0 feet to 13.8 feet
- Shifted the western fence line approximately 135 feet to the east
- Any disturbance within a 100 foot vernal pool envelope will be removed

BFA-3

- Converted approximately 40% of the south and eastern tracker area to fixed tilt
- Decreased interrow spacing between fixed tilt modules from 16.0 feet to 13.8 feet
- Shifted the northern fence line approximately 50-85 feet to the north closer to the distribution easement. The fence is now located 15 feet from the existing Eversource distribution easement
- Shifted Stormwater Basin #3B approximately 280 feet to the east. This eliminates clearing directly south of vernal pools B10, B11, and B12.

- Shifted Fence line on the western and southern sides to bring modules up to the 100 foot wetland buffer
- Any disturbance within a 100 foot vernal pool envelope will be removed

BFA-4

- Decreased interrow spacing between fixed tilt modules from 16.0 feet to 13.8 feet
- Shifted the southern fence line approximately 40-70 feet to the south closer to the distribution easement. The fence is now located 15 feet off of the existing Eversource distribution easement
- Removed modules in the northeast corner of the project to reduce visibility to property owners in the area
- Shifted the northern fence line approximately 385 feet to the south. This reduced the tree clearing in BFA-4 by approximately 16 acres, of which all is small core forest.

Corson Property

- No changes. The interrow spacing was not adjusted here as the proposed grading causes more interrow shading the BFA portions of the project.

Q. Do the revisions in interrow spacing and buffers also comport with best practices?

A. Yes. Like Late-Filed Exhibit 4, the proposed buffers are consistent with Sterling and Plainfield Inland Wetland and Watercourses regulations, and the proposed interrow spacing for the fixed tilt panels is also consistent with current best practices for recent Connecticut projects.

Q. Were the revisions in Late-Filed Exhibit 7 considered for inclusion in Pre-Filed Testimony Exhibit 1?

A. No. The revised site plans in Pre-Filed Testimony Exhibit 1 primarily focus on avoiding impacts to federal wetlands, which is inconsistent with the tradeoffs contained in Late-Filed Exhibit 7.

Q. Do the revisions contained in Pre-Filed Testimony Exhibit 1 reduce the amount of small core forest clearing required by the project?

A. Yes, this site plan reduces necessary small core forest clearing by approximately 16 acres.

V. PREFERRED ALTERNATIVE

Q. Please provide a brief description of which revised plan is preferred and why.

A. The Applicant's preferred site plan is Pre-Filed Testimony Exhibit 1. This plan achieves the necessary balance between impacts to farmland, forest, ecology and project viability in the reduction of approximately 16 acres of small core forest clearing and eliminating any impacts to federal wetlands. This plan also allows for the electrical connection of BFA-1 and BFA-2 and maintains required project output.

Q. Could the project support both the removal of BFA-2 in Late-Filed Exhibit 4 and the reduced clearing in Pre-Filed Testimony Exhibit 1?

A. In short, the project would be unable to meet its obligations associated with the Expedited Zero Carbon RFP if both the removal of BFA-2 and the reduction in clearing was required. The Applicant cannot reconfigure the site to achieve the required energy production.

Q. Why is Pre-Filed Testimony Exhibit 1 a better alternative than simply removing BFA-2 in its entirety?

A. Removing BFA-2 alone does not effectively reduce the amount of necessary tree clearing. While Late-Filed Exhibit 4 removes the array from BFA-2, it would require the same amount of clearing within BFA-4, and therefore provides no reduction in impacts to small core forest. Pre-Filed Testimony Exhibit 1 instead redistributes portions of the proposed array to avoid federal wetlands **and** substantially reducing clearing within BFA-4. In other words, this proposed alternative provides meaningful environmental mitigations in multiple resource categories rather than improving one area while leaving another unchanged. The result is a more comprehensive

and balanced design because it reduces impacts to federal wetlands, vernal pools, and small core forest while maintaining the ability to construct and operate a viable utility-scale renewable energy facility.

Q. From an engineering and environmental planning perspective, why is Pre-Filed Testimony Exhibit 1 the preferred alternative?

A. From both an engineering and environmental planning perspective, Pre-Filed Testimony Exhibit 1 represents the most appropriate and balanced design for the Brookfield Husky Solar Project. Throughout the development of this Project, we have continually evaluated opportunities to avoid, minimize, and mitigate potential environmental impacts while maintaining a facility capable of meeting the State's renewable energy objectives and the contractual obligations associated with the CTDEEP Expedited Zero Carbon RFP.

Unlike Late-Filed Exhibit 4, which removes BFA-2 but does not reduce the overall amount of tree clearing required, Pre-Filed Testimony Exhibit 1 provides meaningful environmental improvements across multiple resource categories consistent with competing state priorities and goals. Specifically, it eliminates potential impacts to federal wetlands, removes all proposed disturbance within 100 feet of vernal pools, relocates Stormwater Basin #3B to improve ecological connectivity between existing vernal pools, and reduces small core forest clearing within BFA-4 by approximately 16 acres. At the same time, it preserves the ability to interconnect BFA-1 and BFA-2 and maintain sufficient generating capacity and energy production necessary for the Project to remain viable.

As stated above, Connecticut has adopted policies that encourage renewable energy while also recognizing the importance of protecting forests, farmland, wetlands, wildlife habitat, and maintaining a reliable and cost-effective electric system. Those goals do not always point to the same answer. Reducing impacts to one resource can result in increased impacts to another, resulting in tradeoffs. From my perspective as engineer and developer of renewable energy projects for the last 10 years, our shared objective is to find the design that best balances those competing considerations.

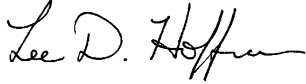
VI. CONCLUSION

Q. Does that complete your testimony?

A. Yes.

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was electronically mailed and/or deposited in the United States mail, first-class, postage pre-paid this 7th day of July 2026 to the individuals on the Service List for Docket 550.



Lee D. Hoffman, Esq.