

Lee D. Hoffman

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November 24, 2020

VIA ELECTRONIC MAIL

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

Re: Docket No. 492 - Gravel Pit Solar application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 120-megawatt-AC solar photovoltaic electric generating facility on eight parcels generally located to the east and west of the Amtrak and Connecticut Rail Line, south of Apothecaries Hall Road and north of the South Windsor town boundary in East Windsor, Connecticut and associated electrical interconnection

Dear Ms. Bachman:

I am writing on behalf of my client, Gravel Pit Solar, in connection with the above-referenced Application. With this letter, I am enclosing Gravel Pit Solar's responses to the Siting Council's requests for late-filed exhibits.

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been made to all parties on the Application's Service List as of this date.

Sincerely,

Lee D. Hoffman

Lee D. Hoffun

Enclosures

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

Gravel Pit Solar application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 120-megawatt-AC solar photovoltaic electric generating facility on eight parcels generally located to the east and west of the Amtrak and Connecticut Rail Line, south of Apothecaries Hall Road and north of the South Windsor town boundary in East Windsor, Connecticut and associated electrical interconnection

Docket No. 492

November 24, 2020

DOCKET NO. 492: GRAVEL PIT SOLAR'S RESPONSES TO THE SITING COUNCIL'S LATE-FILED EXHIBIT REQUESTS

Petitioner Gravel Pit Solar hereby submits the following responses to the Siting Council's requests for late-filed exhibits.

LFE A - Provide a corrected Table 10 from page 56 of the Application.

A corrected Table 10, as well as an accompanying memorandum that explains the correction(s) made, is attached hereto as Exhibit A.

LFE B - Cite a source for the 464 MW of installed solar generating capacity in Connecticut noted on page 6 of the Application.

ISO-New England's ("ISO-NE") "Final 2019 PV Forecast" was the cited source for the "464 MW AC of installed solar generation capacity in the State of Connecticut," noted on page 6 of the Application. It is Gravel Pit Solar's understanding that, as part of this forecast, ISO-NE used generation information for projects equal to or greater than five (5) MW AC nameplate capacity. Please refer to page 13 of the presentation provided at ISO-NE's website, accessible at https://www.iso-ne.com/static-assets/documents/2019/04/final-2019-pv-forecast.pdf for the figure.

ISO-NE has since published "Final 2020 PV Forecast," which indicates that, as of December 31, 2019, Connecticut has 566.53 MW AC installed solar generation capacity. It is Gravel Pit Solar's understanding that, as part of this forecast, ISO-NE used generation information for projects equal to or greater than five (5) MW AC nameplate capacity. Please refer to page 15 of the presentation provided at ISO-NE's website, accessible at https://www.iso-ne.com/static-assets/documents/2020/04/final_2020_pv_forecast.pdf for this figure.

Gravel Pit Solar would also like to indicate that the Solar Energy Industries Association ("SEIA") recently indicated that in 2019, Connecticut had 786 MW of installed solar capacity. SEIA's solar capacity information included varying project sizes ranging from residential, non-residential, and utility. For more Connecticut specific information, please refer to SEIA's website at https://www.seia.org/sites/default/files/2020-09/Connecticut_0.pdf.

LFE C - Cite a source (e.g. report) for the ISO-NE power plant retirement (and at risk for retirement) data noted in paragraph two of page 7 of the Application.

ISO-NE is the source for the power plant retirement(s) information that was included on page 7 of the Application. Please refer to https://www.iso-ne.com/about/what-we-do/in-depth/power-plant-retirements for ISO-NE's power plant retirement information.

LFE D - Provide a corrected response to Council interrogatory #3 "Offtaker/Buyer Table" to include a corrected "Selection" dates column.

Gravel Pit Solar has corrected the "Offtake/Buyer Table" that was provided in response to the Council's Interrogatory No. 3, and it is reproduced below.

Offtaker/Buyer	Amount (MW)	Percentage of Facility	Selection	Regulatory Approval ¹
The Connecticut Light and Power Company d/b/aEversource Energy	16.076	13.40%	Dec. 28, 2018	Nov. 27, 2019
The United Illuminating Company	3.924	3.27%	Dec. 28, 2018	Nov. 27, 2019
The Narragansett Electric Company, d/b/a NationalGrid	49.5	41.25%	Jul. 26, 2019	May 28, 2020
Block Island Utility District d/b/a Block Island Power Company ²	0.4	0.33%	Jul. 26, 2019	N/A
Pascoag Utility District ²	0.1	0.08%	Jul. 26, 2019	N/A
Belmont Municipal Light Department	1.415	1.18%	Jun. 26, 2020	N/A
Block Island Utility District d/b/a Block Island Power Company	0.15	0.13%	Jun. 26, 2020	N/A
Braintree Electric Light Department	4.07	3.39%	Jun. 26, 2020	N/A
Town of Concord, Massachusetts, acting through its Concord Municipal Light Plant	1.85	1.54%	Jun. 26, 2020	N/A
Town of Danvers Electric Division	3.32	2.77%	Jun. 26, 2020	N/A
Georgetown Municipal Light Department	0.55	0.46%	Jun. 26, 2020	N/A
Hingham Municipal Light Plant	2.215	1.85%	Jun. 26, 2020	N/A
Littleton Electric Light and Water Department	3.12	2.60%	Jun. 26, 2020	N/A
Merrimac Municipal Light Department	0.325	0.27%	Jun. 26, 2020	N/A
Middleborough Gas and Electric Department	3.11	2.59%	Jun. 26, 2020	N/A
Middleton Municipal Electric Department	1.085	0.90%	Jun. 26, 2020	N/A
North Attleborough Electric Department	2.5	2.08%	Jun. 26, 2020	N/A
Norwood Municipal Light Department	3.555	2.96%	Jun. 26, 2020	N/A
Pascoag Utility District	0.67	0.56%	Jun. 26, 2020	N/A
Reading Municipal Light Department	7.505	6.25%	Jun. 26, 2020	N/A
Rowley Municipal Light Plant	0.49	0.41%	Jun. 26, 2020	N/A
Taunton Municipal Light Plant	7.37	6.14%	Jun. 26, 2020	N/A
Wellesley Municipal Light Plant	2.68	2.23%	Jun. 26, 2020	N/A
Westfield Gas and Electric Light Department	4.02	3.35%	Jun. 26, 2020	N/A
Total	120	100.00%		

¹ Municipal light department power purchase agreements entered into outside of state run RFP processes did not require regualtory approval ²Block Island Utility District and Pascoag Utility District have entered into two separate sets of power purchase agreements for the project, once as part of the Rhode Island Long-term Contracting RFP and again under a separate procurement process. *Italics* indicates date of power purchase agreement execution.

LFE E - Provide a corrected response to Council interrogatories #43 and #44 - "Smallest Wetland/Watercourse Buffer to Nearest Limits of Work" table and Wetland Impact Map

The corrected "Smallest Wetland/Watercourse Buffer to Nearest Limits of Work" table and Wetland Impact Map is attached hereto as <u>Exhibit B</u>.

LFE F - Provide a copy of the public comments received from the project website.

Copies of the public comments received from the Gravel Pit Solar Website are included in <u>Exhibit C</u>. Also included therein are Gravel Pit Solar's responses to specific questions/concerns raised regarding the Project. Please note that certain personal identifying information, such as names, phone numbers and email addresses have been redacted from Exhibit C.

Respectfully submitted,

Gravel Pit Solar

Lee D. Hoffman

lhoffman@pullcom.com

Amanda G. Gurren

agurren@pullcom.com

Pullman & Comley, LLC

90 State House Square

Hartford, CT 06103-3702

Ph. (860) 424-4315

Ph. (860) 424-4338

Fax (860) 424-4370

Its Attorneys



To: File Date: November 20, 2020

Project #: 42569.00

Memorandum

From: Jeffrey Peterson Steve Kochis Re: Revised Tree Clearing Calculation Gravel Pit Solar, East Windsor, Connecticut

Tree Clearing

The Project will cumulatively result in 83 acres of new tree clearing across the entire Project Area. Approximately 268 acres of the 737-acre Project Site is forested, with approximately 20 acres consisting of ruderal forest in reclaimed gravel pit along the access road from Windsorville Road. Proposed tree clearing represents 100 percent removal of the ruderal forest and 25 percent of the upland forested area within Project Site parcels and (see Figure: Tree Clearing Plan attached).

As documented in Section 6.3 of the Application, existing vegetative cover types were mapped on the Project Area. Cover types are an indicator of the various wildlife habitats provided and are linked to the habitat needs of individual species. VHB analyzed the ecological integrity and alteration of vegetative cover types resulting from the Project as an indicator of potential impacts to wildlife utilizing the Project Area.

The Project Area is subject to significant disturbance as a result of the active mining operations. In addition to this scarified land that will be regraded and utilized for solar panel placement, approximately 228 acres of primarily tobacco fields will be converted to host solar arrays. Both of these current land uses will undergo alteration and improvement as a result of Project activities. For instance, permanent grass cover will be established under the array and along the perimeters of the arrays.

Table 10. REVISED Cover Types with Project Parcels: Existing Area and Areas to be Altered (Acres)

Cover Type	Approximate Existing Area	Approximate Area to be Altered	Approximate Area not Altered
Agricultural Fields	230	228	21
Active Sand and Gravel Quarry	78	76	2
Forested Upland	248	63	185
Ruderal Forest ²	20	20	0
Forested Wetland	40	0	40
Shrubland ³	62	44	18
Other ⁴	59	54	5
Total	737	485	252

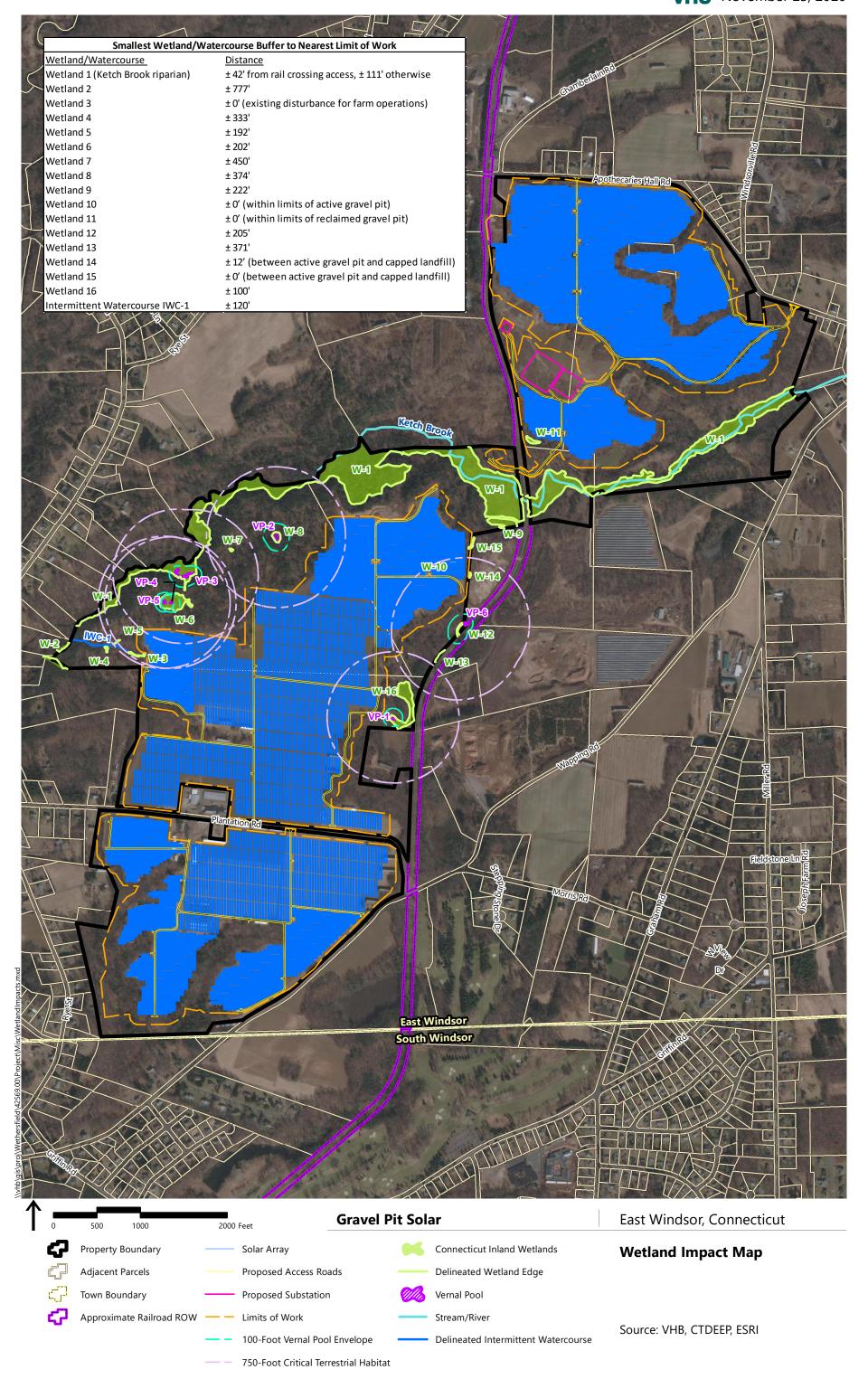
The acreage supporting the solar array panels will all be managed as cool season grassland. Agricultural fields not occupied by solar arrays will also be converted to grassland or other landscape area.

100 Great Meadow Road Suite 200

² Black locust, multiflora rose, Morrow's honeysuckle in reclaimed gravel pit

³ Primarily Public Utility Transmission Corridor and portions of reclaimed gravel pit.

⁴ Includes barns, equipment sheds, roads, perimeter grassed areas, etc.



Date: Thursday, November 19, 2020 at 5:17:34 PM Eastern Standard Time

From: Gravel Pit Solar Contact Form
To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: Gravel Pit Solar Team: I wanted to reach out to introduce and make myself available to Gravel Pit Solar. As the project develops and for incoming travel this project may generate we like to become the host hotel. Who may we contact in regards to setting up hotel rates? Hampton Inn by Hilton Enfield, CT

Number of submissions received

3/1000 this month November 16th – December 15th

Need more submissions?

Please contact your website administrator.

Date: Tuesday, November 17, 2020 at 5:05:44 PM Eastern Standard Time

From: Gravel Pit Solar Contact Form

To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: To whom it may concern, If you are interested, I have worked on similar sites using sheep to control vegetation. In the past I have worked for major utilities controlling vegetation under transmission lines in New Hampshire. For a project this size thinking through how to control vegetation and improve the land for agricultural purposes, using sheep may make a lot of sense and demonstrate the value of dual use on your land. But it is important to design your solar field with this potential use in mind. Sheep also mean you will never have to use herbicides which may be another plus for the project. That was one of the reasons the utilities hired me. I have spent over 12 years developing various management techniques that you might find useful and also might help you get approval for the project. If this is of any interest to you you can contact me at a large or at either of the email addresses above. I look forward to a preliminary discussion should you be interested

Number of submissions received

2/1000 this month November 16th – December 15th

Need more submissions?

Please contact your website administrator.

Date: Tuesday, November 17, 2020 at 2:28:44 PM Eastern Standard Time

From: Gravel Pit Solar Contact Form

To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: Good Afternoon, I represent Mainfreight, a global supply chain logistics company. Locally we are in Windsor CT, are women owned/WBENC status, and utilize our own fleet of trucks and drivers. I am interested to find out if you will be working with local trucking companies or global freight providers if approvals go through and construction begins 2021. It would be great to partner with a nearby CT company. Look forward to hearing from you. Kind regards,

Number of submissions received

1/1000 this month November 16th – December 15th

Need more submissions?

Please contact your website administrator.

Date: Monday, November 9, 2020 at 7:17:55 AM Eastern Standard Time

From: Gravel Pit Solar Contact Form

To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: I would like to speak the the zoom meeting on November 12th. I was informed I have to register. Can you tell me how and where to do this?

Number of submissions received

1/1000 this month October 16th – November 15th

Need more submissions?

Please contact your website administrator.

Date: Thursday, October 1, 2020 at 3:36:27 PM Eastern Daylight Time

From: Gravel Pit Solar Contact Form

To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: If approved I would like to know who to contact to bid the East Windsor Solar Farm project for site clearing, erosion control, pile driving and hydroseeding portion of the project

Number of submissions received

3/1000 this month September 16th – October 15th

Need more submissions?

Please contact your website administrator.

Date: Tuesday, September 29, 2020 at 8:32:57 AM Eastern Daylight Time

From: Gravel Pit Solar Contact Form

To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: Good morning, I represent a Western MA Electrical Contractor with extensive experience in PV installations, completing more than 32MW in this past year in the Central and Western MA markets. I am very interested in partnering for this upcoming work in CT and believe we could be a valuable asset to your team. Please advise as to how I might go about arranging an introduction and being placed on the list of bidders. Best Regards,

Number of submissions received

2/1000 this month September 16th – October 15th

Need more submissions?

Please contact your website administrator.

Date: Thursday, September 24, 2020 at 11:40:30 AM Eastern Daylight Time

From: Gravel Pit Solar Contact Form
To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: I am a real estate broker with a client who owns a 330 A parcel in Montville CT. My client is very interested leasing the property to a solar developer. The site is presently used to harvest dimension stone and other stone products. The site has a number of flat cleared areas in the 30-50 acre range with the capability of easily creating more. High power lines traverse the parcel and 3phase power is at the site. Town will be friendly towards such a project. Little to no impact on residential areas. Small stream (easily avoided) and minimal wetlands. Owner would like to see an 80-100 MW project if possible

Number of submissions received

1/1000 this month September 16th – October 15th

Need more submissions?

Please contact your website administrator.

Subject: New contact form submission from Gravel Pit Solar Website **Date:** Monday, August 17, 2020 at 1:29:01 PM Eastern Daylight Time

From: Gravel Pit Solar Contact Form
To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: Ref: Gravel Pit Solar is a proposed 120-megawatt solar energy project in East Windsor, Connecticut. The solar project will deliver affordable, renewable energy to customers in Connecticut, Massachusetts and Rhode Island – producing enough clean energy to power over 12,000 homes. Why would this project not cover 12,000 homes in Connecticut instead including Massachusetts and Rhode Island? To transmit power that far seems a bit irrational.

Number of submissions received

1/1000 this month August 16th – September 15th

Need more submissions?

Please contact your website administrator.

Subject: New contact form submission from Gravel Pit Solar Website **Date:** Sunday, August 16, 2020 at 1:09:41 PM Eastern Daylight Time

From: Gravel Pit Solar Contact Form
To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: What are your plans for remediation of the solar site when the panels are no longer producing electricity at a valuable return in 30 or so years?

Number of submissions received

8/1000 this month July 16th – August 15th

Need more submissions?

Please contact your website administrator.

Subject: Re: New contact form submission from Gravel Pit Solar Website

Date: Monday, August 17, 2020 at 12:34:23 PM Eastern Daylight Time

From: Aaron Svedlow <aaron@northlightsolar.com>

To:

Attachments: image001.jpg, image002.jpg

Good afternoon

Thanks for your question. At the end of the project's life the equipment will be removed from the property. The property could then be used as open space, agricultural land, or otherwise redeveloped. Our permit application includes a decommissioning plan and budget for removing the equipment and restoring the site. Thanks much, and please let me know if you have other questions or would like to chat on the phone.

Aaron Svedlow aaron@northlightsolar.com North Light Energy, LLC D. E. Shaw Renewable Investments, LLC 207.233.3644



From: Gravel Pit Solar Contact Form <no-reply@webforms.io>

Reply-To:

Date: Sunday, August 16, 2020 at 1:09 PM

To: "aaron@northlightsolar.com" <aaron@northlightsolar.com> **Subject:** New contact form submission from Gravel Pit Solar Website

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: What are your plans for remediation of the solar site when the panels are no longer producing electricity at a valuable return in 30 or so years?

Number of submissions received

8/1000 this month July 16th – August 15th

Need more submissions?

Please contact your website administrator.

Subject: New contact form submission from Gravel Pit Solar Website **Date:** Friday, August 14, 2020 at 9:42:36 AM Eastern Daylight Time

From: Gravel Pit Solar Contact Form

To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: Good morning Project Manager East Windsor CT Site, I am from Comfort Inn at East Windsor, CT. We are newer hotel in our Town compared with other hotels. We are upgrading our entire comfort inn hotel with high end Case goods, 49' LED 4K TVs, Acrylic knockdown paints, Wallpapers, Tiles and lot more. I heard exciting news from Town about you are coming to our Town, You're most Welcome. Please let me know when you're planning to start construction on this project and needs of accommodations for your officers and construction crews how many rooms and for how long. Please email me and/ or call to and ask for the construction of the construction of the construction of the construction of the construction crews how many rooms and for how long. Please email me and/ or call to construction of the c

Number of submissions received

7/1000 this month July 16th – August 15th

Need more submissions?

Please contact your website administrator.

Date: Thursday, August 13, 2020 at 3:49:57 PM Eastern Daylight Time

From: Gravel Pit Solar Contact Form

To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: I'm interested In doing a project on my farm please contact me

Number of submissions received

6/1000 this month July 16th – August 15th

Need more submissions?

Please contact your website administrator.

Subject: New contact form submission from Gravel Pit Solar Website **Date:** Tuesday, August 11, 2020 at 7:01:51 PM Eastern Daylight Time

From: Gravel Pit Solar Contact Form

To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: Testing, testing, 123.

Number of submissions received

5/1000 this month July 16th – August 15th

Need more submissions?

Please contact your website administrator.

Subject: New contact form submission from Gravel Pit Solar Website **Date:** Tuesday, August 4, 2020 at 9:19:56 AM Eastern Daylight Time

From: Gravel Pit Solar Contact Form
To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content



field: Test

Number of submissions received

4/1000 this month July 16th – August 15th

Need more submissions?

Please contact your website administrator.

Subject: Re: New contact form submission from Gravel Pit Solar Website

Date: Thursday, July 23, 2020 at 9:17:49 AM Eastern Daylight Time

From: Aaron Svedlow <aaron@northlightsolar.com>

To:

-Aaron

Attachments: image001.jpg, image002.jpg

Good morning

Thanks for reaching out to us. Our project is actually located off of Apothecaries Hall Road and extends south to Plantation road, so we are approximately 2 miles west of Hamlet at Harvest View as the crow flies. I'd be happy to chat with you about our project, but our facility won't be visible from your street. I believe there may be other solar projects in town but I am not sure of their locations, and we are not affiliated with them. Please feel free to ring me at the number below, and also please check out our project website: www.gravelpitsolar.com. Kind regards

Aaron Svedlow aaron@northlightsolar.com North Light Energy, LLC D. E. Shaw Renewable Investments, LLC 207.233.3644



From: Gravel Pit Solar Contact Form <no-reply@webforms.io>

Reply-To:

Date: Thursday, July 23, 2020 at 8:10 AM

To: "aaron@northlightsolar.com" <aaron@northlightsolar.com>
Subject: New contact form submission from Gravel Pit Solar Website

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: We just moved in to the new development called the Hamlet at Harvest view abutting middle and east road. are the solar panels going to be at the corner of middle and east in broad brook? taking away the beautiful farm view? So it should have been called the Hamlet at solar panel view?

Number of submissions received 2/1000 this month July 16th – August 15th

Need more submissions?

Please contact your website administrator.

Subject: New contact form submission from Gravel Pit Solar Website **Date:** Saturday, June 20, 2020 at 1:41:10 PM Eastern Daylight Time

From: Gravel Pit Solar Contact Form

To: aaron@northlightsolar.com

You just got a form submission!

Form

Email Form

Site

Gravel Pit Solar Website

Submitted content

field: Im interested in working on this job. I hold an e2 license in ct. When is this job starting?

Number of submissions received

2/1000 this month June 16th – July 15th

Need more submissions?

Please contact your website administrator.