

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

Greenskies Clean Energy, LLC petition for a declaratory ruling for the proposed construction, maintenance and operation of a 3.0-megawatt-AC solar photovoltaic electric generating facility on two parcels at the Elmridge Golf Course located to the east and west of North Anguilla Road at the intersection with Elmridge Road, Stonington, Connecticut, and associated electrical interconnection.

Petition No. 1410

September 17, 2020

**INTERROGATORIES DIRECTED TO GREENSKIES CLEAN ENERGY, LLC BY
PROPOSERS FOR RESPONSIBLE EMPLACEMENT OF STONINGTON SOLAR**

Proponents for Responsible Emplacement of Stonington Solar ("PRESS") asks that the petitioner Greenskies Clean Energy, LLC ("Greenskies"), respond to the following interrogatories:

1. Was an accurate boundary survey to Class A-2 standards was prepared by a licensed land surveyor? If no, why do the site plans state that "Boundary lines shown hereon were taken from plans & deeds of record and monuments found" (Sheet LD, survey note #3)?
2. On Sheet LD, survey note #4 states that the topography was taken from Lidar information distributed by NOAA. Was the topographic information verified by field survey to confirm the accuracy of the Lidar mapping? If the answer is no, please explain why.
3. On Sheet LD, survey note #9 states the wetlands were delineated by Milone and MacBroom. Were the wetland flags located by field survey? If the answer is no, please explain why.
4. On Sheet LD, grading note #7 states that "grading will be completed to 95% compaction per the specifications." Does this requirement only apply to those areas being regraded or to all portions of the solar array?

5. On Sheet LD, sediment and erosion control note #8 states “all dewatering waste waters shall be discharged in a manner which minimizes the discoloration of the receiving waters.” How will this be accomplished?

6. For Sheets EX-1, EX-2, and EX-3, were these maps prepared by a licensed land surveyor? Was the location and accuracy of the boundary verified by field survey?

7. For Sheets EX-1, EX-2, and EX-3, why are no soil types are shown?

8. On Sheet LA-1, what type of stormwater practice is Basin #1?

9. On Sheet LA-2, what type of stormwater practice is Basin #2?

10. On Sheet LA-2, there appear to be 3:1 side slope just above the eastern side of Basin #2. How will these areas be protected from the concentrated runoff from the solar panels?

11. On Sheet LA-2, an earth diversion berm is shown south of Basin #2 to divert runoff from the area of the panels immediately south of Basin #2 to the basin. Why did Greenskies not include the grading for that berm, or details for its construction?

12. With respect to the earth diversion berm shown on Sheet LA-2, please provide the hydrologic calculations that demonstrate the berm can divert the runoff from the area of the panels immediately south of Basin #2 to the basin without overtopping.

13. On Sheet SE-1, the soil stockpile is shown in the middle of the array. Is the topsoil being stripped from the area of the array? How will the array be installed in the stockpile that is shown in the middle of the panels?

14. On Sheet SE-3, the soil stockpile is shown in the middle of the array. Is the topsoil being stripped from the area of the array? How will the array be installed in the stockpile that is shown in the middle of the panels?

15. On Sheet SD-2, there appears to be a conflict between the detail of the Outlet Weir Wall and the Weir Wall Schedule. The detail shows that the invert of the lowest weir will

be set 6" above the bottom of the basin. For Basin #1, the bottom is at 52.5', and the lowest weir is specified at 54.0' (1.5' higher than the bottom of the basin), while the detail would have the weir at 53.0. Which elevation is correct?

16. Please provide the dimensions of (1) the vegetated area receiving runoff between rows of solar panels and (2) the average width of the row of solar panels draining to the vegetated area. Why are those dimensions not included on the site plans?

17. Page 5 of the Stormwater Report references an assessment letter from DEEP recommending a survey of the site by a qualified biologist due to the presence of state-listed species in the vicinity of the project site. Was this study conducted? If yes, please indicate where that study may be found in the record. If not, please explain.

18. On page 10 of the Stormwater Report, Milone & MacBroom notes that five test pits were dug by hand on November 26, 2019 to a depth of approximately 24" below existing grade. On page 14, Milone & MacBroom states that five deep test pits were dug on March 31, 2020. Were both the hand holes and the deep test pits excavated in the same locations?

19. On page 11 of the Stormwater Report, Milone & MacBroom states that there were no observations of any semi-confining layers of silt or clay with the sub-soil that would impede downward flow through the soil profile within the test pits completed. Given that the test pits were only dug by hand to a depth of 24" and no infiltration testing was done, what is the factual evidence for this statement?

20. It appears from Section 6.2 of the Stormwater Report (page 20) that Greenskies plans to construct the stormwater basins first and to use them as temporary sediment traps or basins during construction. Is that accurate? If so, please provide the sizing computations showing that the basins may be used as temporary sediment traps, as well as detail for an outlet control structure for their use as temporary sediment traps or basins.

21. Section 7.9 on page 24 of the Stormwater Report lists many types of non-stormwater discharges which could occur on the site, such as uncontaminated air conditioning or compressor condensate, and foundation or footing drains where flows are not contaminated with process materials such as solvents. Where can these activities be found on the site plans? Please either list their locations on the site plans or explain where these activities should be located on the site plans.

22. On page 27 of the Stormwater Report, there are maintenance requirements for grass swales, but there are no grass swales shown on the site plans. Are the swales missing from the plans, or are the maintenance requirements in error?

23. How many solar sites has Greenskies decommissioned? For any such site, please provide the following: (a) site location; (b) site size (acres and number of panels); (c) the actual cost of recycling the panels; (d) the actual costs of excavating the site to decommission it.

24. Please provide any update with respect to meetings between Greenskies and DEEP, including copies of any written correspondence, since Greenskies' August 17, 2020 responses to interrogatories from party Doug Hanson (*see* response to Q40). Has a site visit occurred or been scheduled? If yes, please provide details.

**PROPONENTS FOR RESPONSIBLE
EMPLACEMENT OF STONINGTON SOLAR**

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CERTIFICATION

I hereby certify that a copy of the foregoing document was delivered by e-mail to the following service list:

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