



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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**VIA ELECTRONIC MAIL**

July 2, 2020

Lee D. Hoffman  
Pullman & Comley, LLC  
90 State House Square  
Hartford, CT 06103-3702

RE: **PETITION NO. 1410** – Greenskies Clean Energy, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, 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.

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 23, 2020. To help expedite the Council's review, please file individual responses as soon as they are available. At this time, consistent with the Council's policy to prevent the spread of Coronavirus, please submit an electronic copy only to [siting.council@ct.gov](mailto:siting.council@ct.gov). However, please be advised that the Council may later request one or more hard copies for records retention purposes.

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,

*s/ Melanie A. Bachman*

Melanie Bachman  
Executive Director

c: Gina L. Wolfman, Greenskies Clean Energy, LLC

MB/RM

**Petition No. 1410**  
**Interrogatories**  
**Set One**  
**July 2, 2020**

**Project Development**

1. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
2. Would the Petitioner participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?
3. Please describe the SG2 tariff.

**Energy Output**

4. Have electrical loss assumptions been factored into the output of the facility? What is the output in MW AC of the East and West arrays at the point of interconnection?
5. What is the projected capacity factor (expressed as a percentage) for the proposed project? For clarity, is this capacity factor based on a ratio of AC MWh to AC MWh, or a ratio of AC MWh to DC MWh?
6. Is the project being designed to accommodate a potential future battery storage system? If so, please indicate the anticipated size of the system and where it may be located on the site.
7. Would the impact of soft or hard shading reduce the energy production of the proposed project? If so, was this included in the proposed projects capacity factor?
8. Could the project be designed to serve as a microgrid?
9. 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?
10. Do solar facilities present a challenge for the independent system operator for balancing loads and generation (to maintain the system frequency) due to the changing (but not controlled) megawatt output of a solar facility? What technology or operational protocols could be employed to mitigate any challenges?

**Interconnection**

11. Is the project interconnection required to be reviewed by ISO-NE?
12. Referring to petition App. B, it appears the interconnection plans Part-B2 and Part-B3 are the same. Please clarify.

13. Referring to petition p. 10, what is the status of the interconnection agreements?

### **Public Safety**

14. Where is the nearest federally-obligated airport? Is a glare analysis required to comply with Federal Aviation Administration policy?

15. Referring to petition p. 11, will the petitioner conduct outreach to local emergency responders prior to project operation and offer fire/electrical safety training if requested?

### **Environmental**

16. Referring to petition Figure 4A, indicate the location of the proposed site on the map.

17. Are there any wells in the vicinity of the two solar field sites? If so, how would the petitioner protect identified wells and/or water quality from construction impacts?

18. What is the length of the posts and to what depth would the posts be driven into the ground? What are the impacts to groundwater quality resulting from this activity and how would the petitioner manage and/or mitigate these impacts?

19. Referring to petition pp. 23-24, although the information provided states noise will attenuate with distance, is there any testing or modeling data available to ensure the expected noise 204 feet from the inverter location at the West Project Area would meet State noise control criteria?

20. 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 show (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**

21. Referring to petition p. 10, what conditions will determine if cable trays or underground conduits will be used for wire connections? If cable trays are used, where would they be installed?
22. Referring to petition p. 10, what alternative methods may be used at the site to install racking posts?
23. The proposed construction schedule has a majority of earth work occurring during winter months. Provide detailed winter work procedures for each phase/area that addresses methods of soil stabilization during installation of facility components and stabilization of stormwater control swales and stormwater detention basins.
24. Referring to petition p. 35, approximately what percent of the site development area is within Soil Group C?
25. Referring to petition p. 35, the narrative states groundwater was found in Test Pit 5 but later states no groundwater was found. Please clarify.
26. Referring to petition App. L, -Stormwater Report, App. D - the test pit data indicates groundwater was encountered in Test Pits #3 & #4 in the location of the east side stormwater basin. Due to the presence of groundwater, would the east stormwater basin be considered pond type basin that would retain water year round or during the Spring wet season? If so, how would standing water affect the function of the stormwater basin? The field note on Test Pit 3 recommended raising the basin by 2 feet. Provide more information as to basin design changes, if any, based on this recommendation.
27. Would the sizing of the proposed swales and stormwater basins be designed to comply with DEEP's proposed Appendix I revision to the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities?
28. Referring to petition p. 17 regarding the pre-application meeting with the DEEP Stormwater Division, please describe any recommendations, comments or concerns provided by the Stormwater Division.
29. How would site phasing be accomplished during construction? Would the East and West arrays be under construction at the same time? Would each array area be subdivided into smaller construction phases?
30. Estimate the amount of cut and fill for the proposed project. If there is excess cut, will this material be removed from or deposited on the site property?
31. Referring to Site Plan LD, Sediment and Erosion Control Notes, #6 – does this note include the soil erosion control inspector as required by the DEEP General Permit?

32. Referring to Site Plan LA-2, would any trees be removed to construct the northwest side of the stormwater basin?
33. Referring to Site Plan LA-3, is it possible to relocate the southern fence and landscape strip approximately 10 feet northwards and creating an angled fence line at the southwest corner?
34. Referring to Site Plan SD-3 is the “Mid Slope Berm” the same as the “Earth Diversion Berm” shown on Site Plan LA-2?
35. Referring to Site Plans SE-1 and SE-3, topsoil stockpile locations are shown. Would the topsoil result from removal of all soils within each development area or from only select areas? Please clarify.
36. The topsoil application states topsoil will be spread to a depth of six inches. What specific areas will receive this amount of topsoil? What is the recommended depth (best management practice) of topsoil to ensure proper seed growth and subsequent root establishment for the selected seed mixes to be used at the site?
37. Would the concrete pads be poured on-site? If so, provide details for the cement truck washout station.
38. 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?

#### **Maintenance Questions**

39. What is the expected mowing schedule and minimum cutting height above grade for the selected solar field New England Conservation Wildlife seed mix?
40. What is the cutting schedule for the grass lined stormwater basins? If the east stormwater basin is designed as a pond type basin, provide procedures for invasive species control.
41. Would the modules require periodic cleaning? If so, what procedures/cleaning agents will be used?
42. Would the Petitioner store any replacement modules on-site in the event solar panels are damaged or are not functioning properly? If so, where?
43. Are high voltage signs required for any areas of the solar site?