



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

January 25, 2022

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
KBaldwin@RC.com

RE: **PETITION NO. 1443A** - SR North Stonington, 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 9.9-megawatt AC solar photovoltaic electric generating facility on five parcels located north and south of Providence New London Turnpike (State Route 184), west of Boombridge Road and north of Interstate 95 in North Stonington, Connecticut, and associated electrical interconnection. **Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b).**

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than February 8, 2022.

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 February 8, 2022 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 A. Bachman
Executive Director
MB/MP

c: Service List dated December 20, 2021

Petition No. 1443A
Interrogatories
January 25, 2022

1. For the proposed Modified Project identified in the December 1, 2021 Motion to Reopen and Modify due to Changed Conditions (Motion to Reopen), would energy and renewable energy certificates (RECs) also be sold to The Connecticut Light and Power Company d/b/a Eversource Energy and The United Illuminating Company per the DEEP Small-Scale RFP?
2. Does the Petitioner plan to participate in ISO-NE Forward Capacity Auction #16? Does the Petitioner intend to participate in future Forward Capacity Auctions? If yes, which auction(s) and capacity commitment period(s)?
3. Provide the cost estimate for the Modified Project.

Energy Output

4. Referencing page 6 of the Motion to Reopen, are the proposed 480 Watt solar panels bifacial? Is that wattage based on the front side of the panel only? Provide a copy of the specifications sheet for the solar panels.
5. Estimate the capacity factor for the Modified Project.
6. Is the Modified Project 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 RFP or PPA.
7. Could the Modified Project be designed to serve as a microgrid?

Site Components and Solar Equipment

8. Provide the lengths of the proposed access drives (in linear feet) for each of the two array areas for the Modified Project.
9. Approximately how many megawatts AC are each of the two solar array areas for the Modified Project?
10. Provide the areas (in acres) bounded by the fence for each of the two array areas for the Modified Project.

Interconnection

11. Referencing Petition No. 1443 Findings of Fact #96 and #97, does the distribution impact study need to be revised based on the Modified Project? If yes, provide status or results of such modified distribution impact study.

Environmental

12. Referencing page 9 of the Motion to Reopen, has the Petitioner received a final Natural Diversity Database Determination Letter from the Department of Energy and Environmental Protection (DEEP)? If yes, provide a copy of such letter.
13. Did the Petitioner conduct a Shade Study Analysis? Would shading present any challenges for the Modified Project? If so, of the approximately 35 acres of tree clearing for the Modified Project, approximately what acreage constitutes mitigation for shading? How were the limits of tree shading determined?
14. Referencing Petition No. 1443 Findings of Fact #138 and #139, would the Modified Project comply with DEEP Noise Control Standards? Provide the worst-case projected sound level at the surrounding receptors based on the Modified Project.
15. Referencing Petition No. 1443 Finding of Fact #142, please provide a net carbon dioxide reduction update based on the Modified Project.
16. Referencing Petition No. 1443 Finding of Fact #222, were eastern spadefoot surveys completed? If yes, provide a copy of the final eastern spadefoot survey report.
17. Referencing Petition No. 1443 Finding of Fact #178, please update the Wetland Impact Area Table based on the Modified Project.
18. Would the Modified Project be consistent with the 2015 U.S. Army Corps of Engineers Vernal Pool Best Management Practices?
19. Referencing Petition No. 1443 Finding of Fact #183, would all vernal pools have less than 25 percent post-construction development of the 100-foot to 750-foot Critical Terrestrial Habitat (CTH) areas for the Modified Project? If 25 percent is exceeded for any vernal pools, please identify such vernal pools and estimate the percent post-construction development of the CTHs for each.
20. Referencing Attachment A – Preliminary Site Layout Plan of the Motion to Reopen, the electrical interconnection proposes to be underground. The route on the plan appears to traverse a wetland. Identify the amount of inland wetland impacts and any mitigation to minimize such impacts.
21. Where is the nearest parcel used for publicly accessible recreational purposes? Describe the visibility of the Modified Project from this parcel.

Facility Construction

22. Referencing pages 10 and 11 of the Motion to Reopen, what is the status of the DEEP Stormwater Permit?
23. With regard to earthwork required to develop the site for the Modified Project, provide the following:
 - a) Will the site be graded? If so, in what areas?
 - b) What is the desired slope within the solar array areas?
 - c) Could the solar field areas be installed with minimal alteration to existing slopes?

- d) If minimal alteration of slopes are proposed, can existing vegetation be maintained to provide ground cover during construction?
- e) Estimate the amounts of cut and fill in cubic yards for the access road(s)
- f) Estimate the amounts of cut and fill in cubic yards for solar field grading.
- g) If there is excess cut, will this material be removed from the site property or deposited on the site property?

Decommissioning

24. Has the manufacturer of the proposed solar panels for the Modified Project conducted Toxicity Characteristic Leaching Procedure (TCLP) testing to determine if the panels would be characterized as hazardous waste at the time of disposal under current regulatory criteria? If so, submit information that indicates the proposed solar modules would not be characterized as hazardous waste. If not, would the Petitioner agree to install solar panels that are not classified as hazardous waste through TCLP testing?