



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 14, 2021

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

RE: **PETITION NO. 1451** – C-Tec Solar, 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 3.8-megawatt AC solar photovoltaic electric generating facility and a 2.2- megawatt AC solar photovoltaic electric generating facility located at 277 Sadds Mill Road, Ellington, Connecticut, and associated electrical interconnection.

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than June 4, 2021. 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. 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 A. Bachman
Executive Director

c: Service List dated April 14, 2021

Petition No. 1451
C-Tec Solar LLC- Ellington

Interrogatories
May 14, 2021

Project Development

1. Referencing Petition p. 6, summarize the feedback that the Petitioner received from the abutters. How were their concerns addressed?
2. Please submit a map clearly depicting the boundaries of the solar project site and the boundaries of the host parcel(s). Under RCSA §16-50j-2a(29), "Site" means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located.
3. Referencing Petition pp. 6-7, provide more information as to how the Petitioner developed the following Projects:
 - Board of Education (Bloomfield, CT) -2 MW
 - Voluntown Road (Griswold, CT) - 2.4 MW
 - Bilton Road (Somers, CT) - 3.6 MWDoes C-Tec currently own and operate these facilities? If so, how were they permitted, when were they acquired and by what processes?
4. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
5. Was the project selected through a RFP process? If so, which RFP?
6. Was the project selected for the LREC/ZREC Program?
7. Is the project subject to a virtual net metering agreement? If so, provide details of the agreement.
8. Does the Petitioner have a contract to sell the electricity and renewable energy certificates (RECs) it expects to generate with the proposed project? If so, to which public utility? If the electricity is to be sold to more than one public utility, provide the percentage to be sold to each public utility.
9. What authority approves the power purchase agreement (PPA) for the facility? Has a PPA with an electric distribution company been executed? If so, at what alternating current megawatt output? If not, when would the PPA be finalized?
10. What is the length of the power purchase agreement (PPA)? Are there provisions for any extension of time in the PPA? Is there an option to renew?
11. Is the alternating current megawatt capacity of the facility fixed at a certain amount per the PPA and/or the RFP? Is there an option within the PPA to allow for changes in the total output of the facility based on unforeseen circumstances?

12. If the PPA expires and is not renewed and the solar facility has not reached the end of its lifespan, will the Petitioner decommission the facility or seek other revenue mechanisms for the power produced by the facility?
13. Does the Petitioner intend to participate in future ISO-NE Forward Capacity Auctions? If yes, which auction(s) and capacity commitment period(s)?
14. What is the length of the project site lease?

Proposed Site

15. Referring to Petition p. 14, approximately how many acres of the project site are in each land use zone?
16. Referring to Petition p. 18, approximately how many acres of the project site are located within the previously logged area?
17. Would construction, maintenance and operation of the solar facility interfere with the property owner's continued logging operations or other agricultural activities that are currently conducted on the host parcel? Explain.
18. Is the site parcel, or any portion thereof, part of the Public Act 490 Program? If so, how does the municipal land use code classify the parcel(s)? How would the project affect the use classification?
19. Has the State of Connecticut Department of Agriculture purchased any development rights for the project site or any portion of the project site as part of the State Program for the Preservation of Agricultural Land?

Energy Output

20. Referring to Petition p. 10, the proposed solar panels would be 480 Watts each. Is that wattage based on the front side of the panel only?
21. Have electrical loss assumptions been factored into the output of the facility? What is the output (MW AC) at the point of interconnection?
22. Referring to Petition p. 7, does C-Tec anticipate installing a battery storage system at the site? If so, would there be sufficient space within the site lease area for such a system? What impact would a battery system have on any RFP or PPA?
23. Could the project be designed to serve as a microgrid?
24. 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?

Site Components and Solar Equipment

25. Is the wiring from the panels to the inverters installed on the racking? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation maintenance, or animals?

Interconnection

26. Where on the electrical interconnection route would the demarcation point (or location of change of control from the Petitioner to Eversource) be located?
27. Why is the proposed facility characterized as a 2.2 MW facility and a 3.8 MW facility? Would the 2.2 MW and 3.8 MW solar arrays be separately metered and/or subject to separate contracts? Explain.
28. Is the project interconnection required to be reviewed by ISO-NE?
29. Is the existing distribution system three-phase or would it have to be upgraded from single-phase to three-phase to accommodate the project?

Public Safety

30. In the event of a brush or electrical fire, how would the Petitioner mitigate potential electric hazards that could be encountered by emergency response personnel? Could the entire facility be shut down and de-energized manually in the event of a fire? If so, how?
31. Does the Petitioner intend on conducting outreach and/or training for local emergency responders in the event of a fire or other emergency at the site?
32. Are there any wells on the site or in the vicinity of the site? If so, how would the petitioner protect the wells and/or water quality from construction impacts?
33. The groundwater underlying the proposed site is classified as "GA". What fuel storage and spill prevention methods would the Petitioner employ to protect groundwater resources?
34. Has the Petitioner consulted with DEEP Dam Safety program regarding permitting requirements, if any, for the proposed stormwater basins?

Environmental

35. Referring to Petition p. 21, a core forest value of 60.97 acres is given. Does this value represent the total core forest on the host parcel or does this include the core forest on the abutting parcel to the east, as shown in Figure 4? If the former is true, provide the total size of the contiguous core forest block and the size of two smaller core forest blocks shown in Figure 5.
36. 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

37. Referring to Site Plan T-1, where would the 1,771 cubic yards of excess cut be disposed of?
38. What is the approximate size of the area that needs to be re-graded to achieve slopes of 15 percent or less?
39. Has the Petitioner met with the DEEP Stormwater Division? If yes, on what date? Please describe any recommendations, comments or concerns about the project provided by the Stormwater Division.
40. Provide the estimated typical construction hours and days of the week (e.g. Monday through Friday 8 AM to 5 PM)?

Maintenance/Decommissioning

41. Provide a post-construction Operations and Maintenance Plan (O&M Plan) that includes, as applicable, site and equipment inspections/repairs; vegetation maintenance, stormwater basin maintenance, equipment cleaning, herbicide/pesticide use.
42. Has the manufacturer of the proposed solar panels 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?
43. In the lease agreement with the landowner, are there any provisions related to site restoration at the end of the project's useful life? If so, please provide such provisions.

44. Referring to Petition p. 13, provide a Project Decommissioning Plan. What features/structures would remain in place and for what reason(s)?