



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

September 8, 2021

Jesse A. Langer, Esq.  
Updike, Kelly & Spellacy, P.C.  
One Century Tower  
256 Church Street, 10th Floor  
New Haven, CT 06510

RE: **PETITION NO. 1460** – 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 4.0-megawatt AC solar photovoltaic electric generating facility located east of the Cornwall town boundary at 129 Bartholomew Hill Road, Goshen, Connecticut and associated electrical interconnection.

Dear Attorney Langer:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than September 29, 2021.

Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto: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 September 29, 2021 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 Bachman  
Executive Director

MB/RM

c: Service List dated August 13, 2021

**Petition 1460 - Greenskies - Goshen**  
**Interrogatories**

**September 8, 2021**

**General**

1. Referencing Petition pp. 19-20, of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Were any additional attempts made to contact those property owners.
2. Since the filing of notice to abutters, did the Petitioner receive any abutter or neighbor comments on the proposal? If so, provide a summary of the comments received.
3. What is the estimated cost of the Project?

**Project Development**

4. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s).
5. Does the Petitioner have a contract with Eversource to sell the electricity and renewable energy certificates (RECs) it expects to generate with the proposed project?
6. What authority approves the power purchase agreement (PPA) for the facility? Has a PPA with Eversource been executed? If so, at what alternating current megawatt output? If not, when would the PPA be finalized?
7. Referring to Petition p. 4, is the entire power output from the facility enrolled within the Shared Clean Energy Facilities (SCEF) program? If not, what percentage is enrolled within the SCEF program?
8. If the PPA/SCEF term 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?
9. Would the Petitioner participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?

**Proposed Site**

10. In the lease agreement with the property owner, are there any provisions related to site restoration at the end of the project's useful life? If so, please provide any such provisions.
11. 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?

12. 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?

13. Provide the distance, direction and address of the nearest property line from the solar field perimeter fence.

### **Energy Output**

14. What, if any, electrical loss assumptions have been factored into the output of the facility?

15. What is the efficiency of the photovoltaic module technology of the proposed project?

16. Would the power output of the solar panels decline as the panels age? If so, estimate the percent per year.

17. Could the project be designed to serve as a microgrid?

18. 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? By what mechanism are sections electrically isolated from each other?

19. What is the projected capacity factor (expressed as a percentage) for the proposed project?

20. Is the project being 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 PPA.

### **Site Components and Solar Equipment**

21. 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 chewing animals?

### **Interconnection**

22. Is the project interconnection required to be reviewed by ISO-NE?

23. Referring to Petition p. 10, what is the status of the feasibility study?

### **Public Safety**

24. 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?

25. Referring to Petition Appendix F, what are the results of the TCLP test? Based on the limited information provided, are the panels required to be disposed of as hazardous waste under current regulatory criteria if they are not recycled? If the project is approved, would the Petitioner consider installing solar modules that are not classified as hazardous waste through TCLP testing?

### **Environmental**

26. What is the distance from both Wetland 1 and Wetland 2 to the nearest point of the limit of disturbance?
27. 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?
28. Site Plan SD-1 specifies a North American Green S150 Erosion Control Blanket (ECB) which uses polypropylene netting. Would the Petitioner be willing to use a 100 percent natural fiber ECB at the site?
29. According to the soil borings, groundwater was encountered at a depth of 4 feet in the area of the proposed stormwater basin. As designed, would the stormwater basin retain water during the Spring due to an elevated water table? If so, what measures, if any, can be deployed to prevent the stormwater basin from acting as a decoy pool for vernal obligate species?

### **Facility Construction**

30. Referring to Petition p. 11, describe any recommendations, comments or concerns about the project provided by the DEEP Stormwater Division and how those issues were addressed.
31. The Site Plans specify a 14-foot wide aisle between the rows of panels. Detail Sheet SD-2 depicts a 13-foot wide aisle. Please clarify.
32. What are cut and fills for the proposed project? If there is excess cut, where would it be disposed of?
33. Clarify proposed construction hours/work days as differing times/days were provided in the Petition.
34. Did the Connecticut Airport Authority comment on the Glare Analysis? If so, provide the comments.

### **Facility Maintenance**

35. Would the Petitioner store any replacement modules on-site? If so, is a shed or similar structure proposed? In what location?
36. Would pesticides/herbicides be used at the site? If so, what protocols would be followed?
37. Would heavy accumulations of snow or ice be removed from the panels to maintain power output?