



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

October 25, 2021

Lee D. Hoffman, Esq.  
Pullman & Comley, LLC  
90 State House Square  
Hartford, CT 06103-3702  
[lhoffman@pullcom.com](mailto:lhoffman@pullcom.com)

RE: **PETITION NO. 1463** – 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 1.0-megawatt (MW) AC solar photovoltaic electric generating facility located at a Mulnite Farms, Inc. parcel off Wapping Road, and a 4.0 MW AC solar photovoltaic electric generating facility located at a Mulnite Farms, Inc. parcel off Miller Road, East Windsor, Connecticut, and associated electrical interconnection.

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than November 12, 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 November 12, 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,

A handwritten signature in black ink, appearing to read "Melanie Bachman".

Melanie Bachman  
Executive Director

MB/MP

c: Service List dated August 26, 2021

**Petition No. 1463**  
**Interrogatories**  
**Set One**  
**October 25, 2021**

**Notice**

1. 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 Greenskies Clean Energy, LLC (GCE or 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. For the 1 MW Wapping Road array and the 4 MW Miller Road arrays, does the Petitioner have contract(s) to sell the electricity and renewable energy certificates (RECs) it expects to generate? If so, to which public utility? If the electricity is to be sold to more than one public utility, provide the percentages to be sold to each public utility.
6. For the Miller Road arrays, is the entire output enrolled in the Shared Clean Energy Facilities (SCEF) Program?
7. If the power purchase agreement (PPA), as applicable, or SCEF Program 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?
8. Would the Petitioner participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)? Would this apply to both the Wapping Road array and the Miller Road arrays?

**Proposed Site**

9. Are the site parcels, or any portions 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?
10. Has the State of Connecticut Department of Agriculture (DOAg) 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?

11. Please submit a map clearly depicting the boundaries of the solar facility sites, including the boundaries of the Mulnite Farms I facility (Petition 1422) 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.
12. Would the construction, maintenance and operation of the solar facility interfere with the property owner’s continued agricultural activities that are currently conducted on the host parcel?
13. Referencing page 5 of the Petition, GCE states, “The parcels are currently active farmland with existing farm roads and tobacco barns...” Would all tobacco barns on the subject property remain with the use and control of the property owner? Or would any of the tobacco barns be incorporated in the proposed solar facility for use by GCE? If yes, identify such barns and indicate what the barns would be used by GCE for.
14. Provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar field perimeter fence for the Miller Road arrays and the Wapping Road array.

### **Energy Output**

15. Have electrical loss assumptions been factored into the output of the facility? What is the output (MW AC) at the point of each interconnection?
16. What is the projected capacity factor (expressed as a percentage) for the Wapping Road array and the Miller Road arrays? 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?
17. What is the efficiency of the photovoltaic module technology of the proposed project taking into account bifacial effects as applicable?
18. Could the project be 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/SCEFP.
19. Could the project be designed to serve as a microgrid?
20. If one section of the solar arrays 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?

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

21. Referencing Appendix B of the Petition, Mulnite-Miller Site Plan and Mulnite-Wapping Site Plan, both the Miller Road Arrays and the Wapping Road Array have a 3-foot minimum ground clearance and reach a maximum height of 10.5 feet. Is the ground clearance for the Wapping Road Array expected to be sufficient to allow for crop production under the panels?
22. Provide the approximate overall dimensions of the proposed equipment pads.

23. 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, e.g. sheep?
24. Referencing page 10 of the Petition, GCE notes that approximately 900 linear feet of access would be constructed within the project area. Provide the total access road length for the Wapping Road array and also for the Miller Road arrays.
25. What is the minimum aisle width at both solar array areas?

### **Interconnection**

26. Is the project interconnection required to be reviewed by ISO-NE?
27. Referencing page 11 of the Petition, what is the current status of the PSCAD modeling being conducted by Eversource? If completed, what is the outcome?
28. What is the line voltage of the electrical interconnections? Referencing Appendix B of the Petition, Drawing E100, six new utility poles are proposed. How tall would each pole be? Pole #6 would contain a “ZREC Meter.” However, page 4 of the Petition notes that this is associated with the SCEF, not the ZREC program. Explain.
29. Referencing Appendix B of the Petition, Drawing E100, Miller Road arrays, is the “MV” portion of the electrical interconnection underground or overhead? How many additional poles would be required (beyond the six identified) to accommodate the overhead “OHE” portion of the electrical interconnection and the MV portion if applicable, and how tall would those poles be?
30. Referencing Appendix B of the Petition, Drawing E100, Wapping Road array, is the “MV” portion of the electrical interconnection underground or overhead? How many additional poles would be required (beyond the six identified) to accommodate the overhead “OHE” portion of the electrical interconnection and the MV portion if applicable, and how tall would those poles be?
31. Is existing electrical distribution on Barber Hill Road and Rockville Road single-phase or three-phase?
32. Referencing page 11 of the Petition, Section 3.2.3, would any off-site upgrades to electrical distribution from the proposed site to Barbour Hill Substation be required? Where would the demarcation points (of change of control/responsibility from Petitioner to Eversource) be located on the electrical interconnection for both the Miller Road Arrays and for the Wapping Road Array?

### **Public Safety**

33. Would the project comply with the National Electrical Code, the National Electrical Safety Code and any applicable National Fire Protection Association (NFPA) codes and standards, including, but not limited to, NFPA Code Section 11.12.3.
34. What impacts would crop production within the fenced solar facility site have on fire safety?
35. Provide the areas (in acres) enclosed by the fences for each of the Miller Road arrays and for the Wapping Road array.

36. Would the proposed project meet the applicable Department of Energy and Environmental Protection noise standards at the property boundaries?
37. Where is the nearest federally-obligated airport? Was this airport included in the aviation glare analysis? If not, what airport was considered?
38. Referencing page 27 of the Petition, the Petitioner notes that, "On July 30, 2021, GCE filed with FAA the project information and supporting documents for an aeronautical study to evaluate potential hazards to air navigation and conduct a plume analysis." Why was a plume analysis required?
39. Referencing Appendix B of the Petition, Mulnite-Miller Site Plan and Mulnite-Wapping Site Plan, both the Miller Road Arrays and the Wapping Road Array reach a maximum height of 10.5 feet. Referencing the FAA No Hazard Determination dated September 17, 2021, 8 feet above ground level was utilized as a facility height. Explain.
40. With regard to emergency response:
  - a. Is outreach and/or training necessary for local emergency responders in the event of a fire or other emergency at the site?
  - b. How would site access be ensured for emergency responders?
  - c. 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?
  - d. Could the entire facility be shut down and de-energized in the event of a fire? If so, how?

### **Environmental**

41. Page 29 of the Petition notes that sheep grazing would be used at the Miller Road arrays. Please respond to the following regarding the proposed sheep grazing plans:
  - a. Is livestock grazing an integral component of the project, or can the project proceed without livestock grazing?
  - b. To date, has the Petitioner consulted with any interested sheep farmers for this project?
  - c. During approximately which months of the year would sheep be located at the site?
  - d. Would any sheep be grazing adjacent to residences? Were area residences notified that livestock grazing would occur at the site?
  - e. Should noise from livestock become an issue, could the locations where sheep are located at the site be modified in the future?
  - f. Are any sheds or shelters necessary/proposed for the site? If so, where would they be located?
  - g. Would livestock manure affect water quality in any downgradient wetlands/watercourses? How would such effects be mitigated?
42. 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?
43. Would any fuels be stored on site during construction? If so, provide fuel storage/spill prevention control details.
44. 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?

45. What is the length of the posts and to what depth would the posts be driven into the ground to provide structural stability? Are any impacts to groundwater quality anticipated? If so, how would the petitioner manage and/or mitigate these impacts?
46. Where is the nearest publicly accessible recreational area from the proposed site? Describe the visibility of the proposed project from this recreational area.
47. Referencing the Phase 1B Survey that was submitted to the Council on October 13, 2021. Has a copy of the Phase 1B Survey been submitted to SHPO for review? If so, has the Petitioner received any response from SHPO to date? If yes, please include a copy of such response.
48. Referencing page 26 of the Petition, Section 6.5, GCE states, "Discussions between the Petitioner and all abutting parcels to the Project are ongoing and it is the intent of the Petitioner to incorporate mitigation screening into the site development plan as needed at a later date, following further correspondence, to address screening deficiencies which may exist. The Petitioner intends to provide the Council any updates to visual impact studies or proposed mitigation screening plans." Provide an update on any visual impact studies or mitigation screening plans as applicable.
49. 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**

50. Referencing page 21 of the Petition, GCE had a pre-application meeting with DEEP Stormwater Division on June 21, 2021, and “CT DEEP Stormwater Program had no further comments for the pending stormwater general permit registration.” What is the status of GCE’s DEEP Stormwater Permit application?
51. What impacts would crop production within the fenced solar facility site have on stormwater management ?
52. With regard to earthwork required to develop the site, 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?
53. How would the posts (that support the racking system) be driven into the ground? In the event that ledge is encountered, what methods would be utilized for installation?
54. What is the minimum access road width required for post-construction use?
55. Has a comprehensive geotechnical study been completed for the site to determine if site conditions support the overall Project design? If so, summarize the results. If not, has the Petitioner anticipated and designed the Project with assumed subsurface conditions? What are these assumed conditions?

### **Maintenance Questions**

56. Would the Petitioner remove snow that accumulates on the panels? Would snow accumulation on the solar panels affect the output of the facility? Under what circumstances would snow be removed? Describe snow removal methods.
57. Describe the type and frequency of anticipated vegetation management for detention basins and swales as applicable.
58. Would the installed solar panels require regular cleaning or other, similar, maintenance? If so, describe cleaning procedures including substances used. Would this maintenance activity have any impacts to water quality?
59. Referencing Appendix C of the Petition, Operations and Maintenance Plan, Section 9.2, the Petitioner notes that mowing would be performed two to three times annually. Would the mowing schedule differ between the Miller Road Arrays with sheep grazing versus the Wapping Road Array without sheep grazing? Explain.
60. Would the petitioner store any replacement modules on-site? If yes, would they be located in one of the barns or would a separate shed be constructed for such storage? Identify the location.

61. Would pesticides/herbicides be used at the site? If so, what protocols would be followed?
62. 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.
63. 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?