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April 17, 2025

VIA ELECTRONIC MAIL AND U.S. MAIL

Melanie Bachman, Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition 1463 - CF Mulnite, LLC Declaratory Ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the 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

Petition 1463A - CF Mulnite, LLC Declaratory Ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the 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. Modified Declaratory Ruling

Dear Ms. Bachman:

I am writing on behalf of my client, CF Mulnite LLC (the “Petitioner”) in connection with the above-referenced Petitions. As you are aware, on April 22, 2021, the Connecticut Siting Council (the “Council”) approved Petition 1422. On February 29, 2024, the Council approved Petition 1463. On March 1, 2024, the Council approved Petitions 1422A and 1463A, which modified the underlying petitions, subject to multiple conditions. This letter will serve to satisfy several of those conditions related to the parcel now addressed by Petition 1463/1463A.

Specifically, the Council may recall that it reopened Petitions 1422 and 1463 to allow two parcels (Parcel A and Parcel B in the map below) to be combined into Petition 1422. After the Council’s approval of Petitions 1422A and 1463A, Parcel C was the only parcel that remained in Petition 1463. Petitioner would now like to begin construction on Parcel C, and to do so, it must satisfy the conditions that the Council provided for that parcel. Included with this letter are the bulk of the items that satisfy the Council’s conditions.

Please note that the map on the next page shows the parcels as they were situated *before* the Council issued its March 1, 2024 approval. Parcels A and B as depicted below are now subject to Petition 1422/1422A. Parcel C, which is the subject of this writing, is subject to Petition 1463/1463A.



The first condition of the Council's March 1, 2024 approval was for the Petitioner to provide the Council with a copy of the DEEP-issued Stormwater Permit prior to the commencement of construction. On September 7, 2022 the Petitioner received this approval from the Connecticut Department of Energy and Environmental Protection.

The second condition of the March 1, 2024 approval required the preparation of a Development and Management (D&M) Plan for the project in accordance with applicable regulations. The D&M Plan is to be submitted to and approved by the Council prior to the commencement of facility construction and shall include the following items:

- a. Final site plans including, but not limited to, final facilities layout, access roads, electrical interconnection including riser pole locations, fence design, equipment pads, stormwater management control structures, and final seed mix.

These plans are included as part of this submission.

- b. Existing farm road access to Parcel B shall remain unimpeded as a result of development of the solar facilities and stormwater basins.

As can be seen on the site plans that have been submitted with this letter, the Petitioner confirms that it will not impede the existing farm road access to Parcel B.

- c. Final Farm Co-use Plan for hosting sheep grazing at Parcels A, B and/or C, including, but not limited to, provisions for possible on-site sheep relocation, if necessary, with a document that shall indemnify and hold harmless the Council, its agents, representatives and employees from any and all losses, claims, actions, costs and expenses, judgments, subrogation, or other damages resulting from any injury to a person or to property arising out of the presence of third-party farmers within any of the fenced solar facility sites.

A copy of the Farm Co-use Plan for Parcel C, including a signed indemnification agreement, is included with this submittal.

- d. Consultation with DEEP Stormwater Division regarding the potential impacts of sheep grazing on the facility sites and any recommendations from DEEP, as applicable.

DEEP Stormwater staff have confirmed that no language in the Stormwater Construction General Permit would prohibit the grazing of sheep. Staff did not provide any further recommendations.

- e. Final plans for the location and maintenance of beehives on Parcel B;

Because the Petitioner has revised the underlying site plan to place Parcel B into Petition 1422, the Petitioner respectfully requests that the Council deem this condition moot for this Petition and submittal.

- f. Erosion and sedimentation control plan consistent with the 2002 Connecticut Guidelines for Erosion and Sedimentation Control including, but not limited to, temporary sediment basin details, site stabilization/seeding/growing season details prior to the installation of post driving/racking system, site stabilization measures during construction, inspection and reporting protocols, methods for periodic clearing of temporary sediment traps and swales during construction, and final cleaning of stormwater basins upon site stabilization.

These materials are included with this submission.

- g. Site construction detail/phasing plan including, but not limited to, construction laydown area, site clearing/grubbing, site grading, excess earth material disposal locations, site stabilization/seeding/growing season details, soil stockpile locations, and a fuel storage/spill plan that is protective of groundwater resources and includes transformer protections including containment measures and/or low level oil alarms.

This can be found in the link in the site plans labeled “2025-04-06 12463 East Windsor, CT (Mulnite Miller) – Civil IFC Rev5. The phasing plan is on page C-5.0 in the drawing package.

- h. Final visual screening plan.

The final landscaping plan for the facility is included with this submittal.

- i. Toxicity Characteristic Leaching Procedure (TCLP) test results for the selected solar panels that indicate the modules will not be characterized as hazardous waste under current regulatory criteria.

A final TCLP report, indicating that the selected solar panels will not be characterized as hazardous waste, is included with this submittal.

- j. Final structural design for solar module racking systems stamped by a Professional Engineer duly licensed in the State of Connecticut.

The final designs are included with this submittal.

- k. Consult with Eversource Energy (Eversource) to reduce the visual impact of the electrical interconnections by considering the installation of underground lines from the solar arrays to the poles near the street (for each interconnection) and minimizing the number of poles required (both near the arrays and near the street) and the use of pad-mounted equipment (e.g. meters and reclosers) near the street and submit the Final Interconnection Plan/Electrical Drawings as approved by Eversource and a detailed report explaining the rationale for the final interconnection configurations including cost considerations prior to construction.

The Petitioner consulted with Eversource in an effort to reduce the visual impact of the electrical interconnection. When asked by Petitioner if there were any options to reduce visual impact of interconnections, Eversource explained that it does not currently install pad mounted reclosers in the state of Connecticut. Eversource also indicated it could provide pad mounted primary metering but with an associated 50% cost increase and typically a 12-month lease time for such equipment. Petitioner was able to make one improvement to the visual impact of interconnection in that, as can be seen in the attached drawings, pole #6 has been removed from the design.

- l. Construction traffic control plan developed in consultation with the Town of East Windsor.

Petitioner's consultant, VHB has been working on the traffic control plan. This item will be submitted under separate cover.

The other conditions of the of the March 1, 2024 approval are ongoing requirements or relate to post-construction issues.

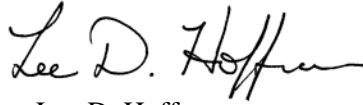
Copies of the above-referenced materials can be found by clicking on the following link:

<https://cfus.box.com/s/wnj6w1n0ch6ml99yrzwzguec46ui0xd2>.

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Should you have any questions concerning this filing, please contact me at your convenience. I certify that copies of these responses were sent to all parties on the service list for Petitions 1463 and 1463A.

Sincerely,

A handwritten signature in black ink that reads "Lee D. Hoffman". The signature is written in a cursive, flowing style.

Lee D. Hoffman

Enclosures