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February 7, 2022

FILED BY HAND DELIVERY AND E-MAIL

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

Re: PETITION OF TRITEC AMERICAS, LLC FOR A DECLARATORY RULING THAT NO CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED IS REQUIRED FOR THE CONSTRUCTION, OPERATION, MAINTENANCE, AND DECOMMISSIONING OF A 1.97 MW AC SOLAR PHOTOVOLTAIC PROJECT IN POMFRET, CONNECTICUT

Dear Attorney Bachman:

CT Solar Portfolio I, LLC, a Delaware limited liability company and a subsidiary of TRITEC Americas, LLC (“Petitioner”) respectfully submits the attached petition for a declaratory ruling (“Petition”) referenced above to the Connecticut Siting Council (“Council”).

Consistent with Council requirements, Petitioner submits one electric version, an original, and fifteen hard copies of all necessary documents.

Please contact me if you have any questions or concerns.

Sincerely yours,

Paul R. Michaud

STATE OF CONNECTICUT

SITING COUNCIL

PETITION OF CT SOLAR PORTFOLIO I, : Petition No. _____
LLC FOR A DECLARATORY RULING THAT :
NO CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED IS :
REQUIRED FOR THE CONSTRUCTION, :
OPERATION, MAINTENANCE, AND :
DECOMMISSIONING OF A 1.97 MW AC :
SOLAR PHOTOVOLTAIC PROJECT IN :
POMFRET, CONNECTICUT :
_____ : **February 7, 2022**

Under Conn. Gen. Stat. §§ 4-176 and 16-50k(a) and Conn. Agencies Regs. § 16- 50j-38 *et seq.*, and Conn. Gen. Stat § 16-50(k)(e), CT Solar Portfolio I, LLC, a Delaware limited liability company and a subsidiary of TRITEC Americas, LLC (“Petitioner”) requests that the Connecticut Siting Council (“Council”) approve by a declaratory ruling the location, construction, operation, maintenance, and decommissioning of a solar photovoltaic facility with the capacity of 1.97 MW AC and associated equipment inclusive of all solar panels, transformers, electrical switchgear, monitoring equipment, and access roadways (“Project”). The Project will be constructed on approximately 13 acres of a 215.6-acre parcel located at 254 Putnam Road in Pomfret, Connecticut (“Project Site”). Connecticut General Statute (C.G.S.) § 16-50k(a) provides in part:

Notwithstanding the provisions of this chapter or title 16a, the council shall, in the exercise of its jurisdiction over the siting of generating facilities, approve by declaratory ruling (A) the construction of a facility solely for the purpose of generating electricity, other than an electric generating facility that uses nuclear materials or coal as fuel, at a Project Site where an electric generating facility operated prior to July 1, 2004, and (B) the construction or location of any fuel cell, unless the council finds a substantial adverse environmental effect, or of any customer-side distributed resources project or facility or grid-side distributed

resources project or facility with a capacity of not more than sixty-five megawatts, as long as: (i) Such project meets air and water quality standards of the Department of Energy and Environmental Protection, (ii) the council does not find a substantial adverse environmental effect, and (iii) for a solar photovoltaic facility with a capacity of two or more megawatts, to be located on prime farmland or forestland, excluding any such facility that was selected by the Department of Energy and Environmental Protection in any solicitation issued prior to July 1, 2017, pursuant to section 16a-3f, 16a-3g or 16a-3j, the Department of Agriculture represents, in writing, to the council that such project will not materially affect the status of such land as prime farmland or the Department of Energy and Environmental Protection represents, in writing, to the council that such project will not materially affect the status of such land as core forest. In evaluating a project for purposes of subparagraph (B)(iii) of this subsection, the Departments of Agriculture and Energy and Environmental Protection may consult with the United States Department of Agriculture and soil and water conservation districts.
[Emphasis Added]

As discussed below, Petitioner will construct a clean and environmentally friendly Project that produces the maximum amount of carbon-free and clean energy while avoiding and minimizing any substantial adverse environmental effects and help promote Connecticut's goal of 100% zero-carbon emissions generation by 2040. Based on the evaluations and analysis presented in this Petition by various technical and environmental experts and consultants, the Project will be a renewable distributed generation resource with a nameplate capacity of not more than sixty-five megawatts, will meet air and water quality standards of the Department of Energy and Environmental Protection ("DEEP"), and will not have any substantial adverse environmental effect. Accordingly, the construction, operation, maintenance, and decommissioning of the Project fully comport with the legal requirements outlined in Conn. Gen. Stat. § 16-50k(a) and should be approved by the Siting Council by a Declaratory Ruling.

I. INTRODUCTION:

Petitioner is a California-based limited liability company that develops renewable energy projects in Connecticut. Petitioner’s principal place of business is 888 Prospect Street, Suite 200, La Jolla, CA 92037. Petitioner, its consultants, and its legal counsel have worked diligently with the town and adjacent property owners in developing the Project. Please address all legal correspondence and communications regarding this Petition to:

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II. LOCAL INPUT, NOTICES TO PROJECT ABUTTERS AND GOVERNMENTAL OFFICIALS AND AGENCIES:

Petitioner has actively sought input from the Town of Pomfret (“Town”) and adjacent property owners regarding the Project. Petitioner is committed to providing the Town and adjoining property owners with as much information regarding the Project as possible. In support of this goal, Petitioner conducted two video conferences that included the First Selectman and many interested adjacent property owners on June 10, 2021 and June 28, 2021. The meetings were conducted virtually considering the COVID-19 pandemic. In addition, as required by the Regulations of Connecticut State Agencies § 16-50j-40, Petitioner provided written notice of this Petition to all Project abutters and appropriate municipal officials and other government officials and agencies on June 1, 2021 and June 16, 2021. Certification of Service and the Model Notice Letters are shown in **Exhibit A** attached hereto.

III. PROJECT:

In developing the Project, Petitioner strongly considered Connecticut’s energy policy goals to develop and utilize renewable energy resources as much as possible. See Conn. Gen. Stat. § 16a-35k. The proposed Project is a Class I renewable energy source under Conn. Gen. Stat. § 16-1(a)(26). Under Public Act 11-80, The Connecticut Light and Power Company d/b/a Eversource Energy (“Eversource”) is required to procure Class I Zero Emissions Renewables Energy Credits (ZRECs) to help achieve Connecticut’s renewable energy policy and goals. Petitioner submitted a bid for the Project into Eversource’s competitive ZREC Request for Proposals (“ZREC RFP”) and was granted a long-term (15 years) contract for the ZRECs that the Project will produce. Selection of the Project by Eversource will help Connecticut meet its clean energy and carbon-free generation policy goals.

A. Project Site:

Petitioner utilized its internal experience and the knowledge and expertise of third-party electrical engineering, civil engineering, and legal counsel to analyze and select the Project Site. Project Site selection was based on the site’s suitability regarding size, topography, and the absence of biological and hydrological conflicts, site availability, the proximity of the site to existing electrical infrastructure, and approval by Eversource to interconnect the Project to the Eversource electric distribution grid at the Project Site. The Project has been designed to minimize the disturbance of the land required and preserve most of the site. Petitioner conducted an extensive Project and Project Site assessment and analysis to prepare this Petition. The Project and Project Site Assessment involved the industry-leading expert consultants shown in the table below:

Consultant	Site of Project Site Assessment and Analysis
Smith & Company Surveyors & Engineers, Inc.	Land Surveying
All-Points Technology Corporation, P.C.	Civil Engineering

All-Points Technology Corporation, P.C.	Wetlands Delineation and Impact Analysis
All-Points Technology Corporation, P.C.	Habitat Review and Assessment
Down to Earth Consulting, LLC	Geotechnical Design Services
Heritage Consultants, LLC	Phase IA Environmental Project Site Assessment
Blymyer Engineers	Mechanical Engineering and Design
Blymyer Engineers	Electrical Engineering and Testing
Blymyer Engineers	Interconnection Design and Medium Voltage Analysis

B. Property Description:

The Project Site (fence line) is located within a small portion (13 acres or about 7%) of the overall property, about 216 acres. The remaining 93% of the property will continue to be utilized by the property owner for its family farming operations. The Project Site is an open hayfield with only one tree that will not be impacted. The immediate vicinity of the Project Site consists of sparsely developed residential, farmland, and undeveloped properties. See Project Site, Interconnection, Existing Conditions, Proposed Conditions, and Surrounding Features Maps in Exhibit B attached hereto.

C. Project Description:

The Project will be a ground-mounted solar photovoltaic system using a single-axis sun tracking system and related improvements. The Project has approximately 5,382 non-reflective solar panels measuring approximately 8'-1" above final grade, surrounded by a chain-link security fence in its maximum tilt position. The solar modules are designed to absorb incoming solar radiation and minimize reflectivity, such that only a tiny percentage of incidental light will be reflected off the panels. This incidental light is significantly less reflective than standard building materials, such as steel or the surface of smooth water. The panels will rotate east to west tracking the sun, thereby further reducing overall reflectivity (in any given direction). Petitioner will construct the Project at the Project Site. The Project construction period is estimated to take three

to four months after receiving all required state and local government permits and approvals. Please see the Table directly below with the Project Construction Schedule.

Task	Duration
Mobilization and Project Site preparation	Two weeks
Civil work: road construction, grading	Two weeks
Racking, panel & electrical installation	Three weeks
Interconnection and medium voltage	Two weeks
System testing	One week
Approvals & commissioning	Two weeks

D. Electric Distribution Grid Interconnection:

Petitioner will interconnect the Project to the Eversource electric distribution grid as depicted on the Interconnection Map shown in Exhibit B. Eversource reviewed the Project’s electrical design and output during their system impact review process and determined that the distribution circuit for the Project is suitable for the energy delivery to the electric grid from the Project. The existing electrical infrastructure was one of the critical reasons Petitioner selected the Project Site based on the assessment and analysis conducted by its electrical engineering consultant - Blymyer Engineers. Eversource has granted interconnection approval to the Project, and Petitioner and Eversource have entered into an interconnection agreement. Eversource has indicated that it is ready to commence the necessary interconnection upgrades for the Project upon receiving a notice to proceed from Petitioner and will work to complete the interconnection upgrade within a few months of approval by the Council.

E. Equipment, Construction, Operation & Maintenance, and Decommissioning:

1. Equipment. The Project will produce carbon-free clean energy and improve grid resiliency by providing distributed energy where it is needed. The Project's operational life is based on the designed life expectancy of the equipment. The Project equipment comprises premium modules; a single-axis sun tracker system has designed life and warranty extending for twenty years. The inverters for the Project have an operational life and warranty of approximately ten years. Petitioner expects at least one inverter replacement during the total operational life of the Project. Therefore, the anticipated operational life of the Project is twenty-plus years, but no more than thirty years, at which time the Project will be decommissioned and completely removed from the property. The Project construction will have an anticipated duration of three to four months, requiring the services of local electrical, civil, and structural contractors. There will be a single access road on the Property Project Site, and steel foundations will be driven into the ground for the solar array. Steel racking components will be mounted on these foundations, followed by the installation of photovoltaic modules. The electrical contractor will then install conductors from the photovoltaic modules to the inverters and then to a single transformer on a single pad on the edge of the array. Single switchgear will also be mounted to this pad. There will be eight pads. The electrical contractor will install a medium voltage circuit from the Project Site to the Eversource point of common coupling. See Project Equipment List in **Exhibit C** attached hereto.

2. Construction and O&M. The Project construction schedule would be based on a five-day workweek Monday through Friday between 7:00 a.m. ET and 5:00 a.m. ET will be modified if required to comply with the Town of Pomfret's codes and requirements. Petitioner will construct the project consistent with erosion and sedimentation control procedures by the *2002 Connecticut Guidelines for Erosion and Sedimentation Control*. Once built and operational, the

Project will be monitored remotely twenty-four (24) hours a day, seven days a week, through a data acquisition system (“DAS”). The DAS system can detect local weather conditions, production from all equipment for the Project, and safety concerns related to grid outages or faults. In the event of a fault or power outage within the solar facility and the Eversource distribution circuit, the Project must be isolated from the distribution circuit within two seconds of fault detection. The Project’s Operations and Maintenance company will perform detailed scheduled annual inspections of all equipment at the Project Site. In addition, the Operations and Maintenance company will always be on-call in the event of unscheduled equipment maintenance or safety-related concerns. The vegetation within the Project Site is mowed two times a year. The Project's Operations and Maintenance (O&M) Plan is shown in **Exhibit D** attached hereto.

3. Decommissioning Plan. At the end of the Project's operational life, Petitioner will remove all equipment (*e.g.*, tracking system, panels, inverters, electrical collection system, etc.) from the Project Site. The Decommissioning Plan for the Project is shown in **Exhibit E** attached hereto.

F. Public Health and Safety:

Petitioner is immensely focused on safety and will meet or exceed all health and safety requirements applicable for electric power generation. The Project will be designed to meet relevant industry, state, and local codes and standards and will not pose a safety concern or create an undue hazard to the public. The Project includes a proposed seven-foot-high safety fence and gate (which is mandated by National Electric Code) that will limit access to authorized or emergency personnel only. Each employee working at the Project Site will (1) receive required general, and Project Site health and safety training, (2) comply with all health and safety controls as directed by local, state, and federal requirements, (3) understand and employ the Project Site

health and safety plan, (4) know the location of local emergency care facilities, travel times, ingress, and egress routes, and (5) immediately report all unsafe conditions to the construction manager.

G. Reduction in GHG Emissions Compared to Natural Gas:

Using resources from the National Renewable Energy Laboratory (NREL) and the U.S. Environmental Protection Agency (EPA), Petitioner estimates that there would be a 99.99% reduction in greenhouse gas (“GHG”) emissions by pursuing solar instead of natural gas. Petitioner estimates that over 20 years, the Project will generate 13,377.78 MWh of electricity while emitting approximately .63 tons of CO₂e. To achieve the equivalent MWh production over 20 years as the Project, a natural gas generator would emit an estimated 5,498.4 tons of CO₂e. The above calculations are shown in **Exhibit F** attached hereto.

H. Environmental Assessment:

All-Points Technology Corporation, P.C. (“APT”) prepared a comprehensive Environmental Assessment (“EA”) for the Project, which is shown in **Exhibit G** attached hereto.

IV. CONCLUSION:

As discussed above and in the EA, Petitioner’s purpose is to construct a clean, carbon-free, and environmentally friendly Project that will produce the maximum amount of carbon-free clean energy while avoiding and minimizing any adverse environmental effects. Based on the evaluations and analysis presented in this Petition by Petitioner and Petitioner’s technical and ecological expert consultants, the substantial evidence shows that the Project will be a distributed resources project with a capacity of not more than sixty-five megawatts, will meet or exceed the air and water quality standards of DEEP, and will not have any substantial adverse environmental effect. Accordingly, Petitioner respectfully requests that the Council grant this Petition for a

Declaratory Ruling and approve the location, construction, operation, maintenance, and decommissioning of two solar photovoltaic facilities with a combined capacity of 1.97 MW AC and associated equipment inclusive of all solar panels, transformers, electrical switchgear, monitoring equipment, and access roadways.

RESPECTFULLY SUBMITTED,

CT SOLAR PORTFOLIO I, LLC



By: _____

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Exhibit A

Certification of Service – Model Service Letters

Exhibit B

Project Site, Interconnection, Existing Conditions, Proposed Conditions, and Surrounding
Features Maps

Exhibit C

Project Equipment List

Exhibit D

Operations and Maintenance Plan

Exhibit E

Decommissioning Plan

Exhibit F

Carbon Debt Analysis

Exhibit G

Environmental Assessment

Exhibit H

Natural Diversity Database Preliminary Assessment

Exhibit I

State-Listed Invertebrate Host Plant Survey Results

Exhibit J

State-Listed Bird Species Assessment

Exhibit K

State-Listed Herpetological Habitat Assessment

Exhibit L

US Fish & Wildlife Service's Compliance Statement

Exhibit M

Cultural Resources Reconnaissance Surveys

Exhibit N

Federal Aviation Administration Determination

Exhibit O

Viewshed Maps and Photo-Simulations