



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

March 22, 2022

Paul R. Michaud, Esq.
Principal/Managing Attorney
Michaud Law Group LLC
101 Centerpoint Drive, Suite 230
Middletown, CT 06457
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RE: **PETITION NO. 1487** – TRITEC Americas, 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 1.97 megawatt AC solar photovoltaic electric generating facility located at 254 Putnam Road, Pomfret, Connecticut, and associated electrical interconnection.

Dear Attorney Michaud:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 19, 2022. Please submit an original and 15 copies to the Council's office and an electronic copy to 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 April 19, 2022 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 A. Bachman".

Melanie A. Bachman
Executive Director

C: Service List

MB/RM

Petition No. 1487
TRITEC Americas, LLC
Pomfret, Connecticut
Interrogatories

Project Development

1. The Petition states the ZREC contract is for a period of 15 years. Can this contract be extended/renewed? If not and the solar facility has not reached the end of its lifespan, will the Petitioner decommission the facility at that time or seek other revenue mechanisms for the power produced by the facility?
2. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
3. Referring to Petition p. 3, did the Town present recommendations during project outreach? If so, describe the recommendations and how these recommendations were addressed and/or included within the project design? What were the concerns of the abutting property owners and how were these concerns addressed?
4. What is the estimated cost of the project?

Proposed Site

5. Provide 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.
6. In the lease agreement with the property owner:
 - a. What is the term of the lease?
 - b. Could the lease term be extended? If so, at what time intervals?
 - c. Are there any provisions related to decommissioning and/or site restoration at the end of the project’s useful life? If so, please describe and/or provide any such provisions.
7. Is the site parcel, 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?
8. 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?
9. Provide the distance, direction and address of the nearest property line from the perimeter fence.

Energy Output

10. What is the anticipated capacity factor of the project? Would the capacity of the system decline over time? If so, estimate annual losses.

11. Is the project subject to a virtual net metering agreement? Would total project output be dedicated to virtual net metering?
12. Is the project being designed to accommodate a future potential battery energy storage system? If so, where would it be located?
13. Would the Petitioner participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?

Site Components and Solar Equipment

14. Referencing SP-1, eight PV systems are identified. Will these systems operate independently such that if an interconnection failure or maintenance shut down occurs at one, the others will continue to operate?
15. Why is there a mix of 400-watt and 570-watt PV panels for this project? Can the 400-watt panels be replaced with 570-watt panels to reduce the project footprint?
16. Is the wiring from the panels to the inverters installed on the racking system? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation maintenance, or animals?
17. Site Plan DN-1 specifies a six-foot high chain link fence. Revise the plan to include a seven-foot high chain link fence, as referenced on Petition p. 8.

Interconnection

18. Is the project interconnection required to be reviewed by ISO-NE?
19. What is the line voltage of the electrical interconnections?
20. Would any off-site upgrades to the electrical distribution system be required? If so, describe.
21. The Petition indicates 12 utility poles are required for this project. Provide the following.
 - a) How tall would the proposed utility poles be?
 - b) How many utility poles would be owned by Eversource?
 - c) Indicate where the demarcation point(s) of change of control/responsibility from the Petitioner to Eversource would be located on the electrical interconnection for the project.
 - d) Is it possible to reduce the number of utility poles required for the Project by ungrounding more on the interconnection line?

Public Safety

22. Would the Petitioner conduct outreach/training to local emergency responders in the event of a fire or other emergency at the site?
23. In the event of a fire or emergency, describe procedures that will allow emergency responders to shut down the facility.

24. If there are private water wells on site or in the vicinity of the site, how would the Petitioner protect the wells and/or water quality from construction impacts related to post driving/drilling?
25. Provide the calculated noise level from Project operations to the nearest property line.
26. Referencing Petition p. 8, what is the name and location of the Operations and Maintenance (O&M) company for the site? What procedures would be followed by the O&M company in regard to emergency response?
27. Referring to Petition Exhibit N, where is the nearest federally-obligated airport? Is an FAA glare analysis necessary for this project?

Environmental

28. What is the maximum ground slope within the solar array area?
29. Referring to Site Plan EC-4, what is the purpose of the silt fence "arms" that extend east from the solar field footprint?
30. Referencing Petition Environmental Assessment p. 32, what is the status of the Project review by the State Historic Preservation Office?
31. What is the status of the Department of Energy and Environmental Protection (DEEP) Natural Diversity Database (NDDDB) review of Project? Has DEEP received the field survey reports? If so, when?
32. Referring to Site Plan DN-1, the selected solar field seed mix contains 95 percent lawn grass. Can a seed mix be used that contains more pollinator species? If no, why not? If yes, provide seed mix detail.
33. Referring to the Petition Environmental Assessment Bird Study pp. 7-8, what is the reduction in available habitat to grassland birds, inclusive of the project footprint and the narrow grassland east of the project footprint.
34. Has the petitioner met with the DEEP Stormwater Division? If yes, when? Describe any recommendations, comments or concerns about the project provided by the Stormwater Division. At what point would the Petitioner apply for a Stormwater Permit?
35. 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:

- a. wetlands, watercourses and vernal pools;
- b. forest/forest edge areas;
- c. agricultural soil areas;

- d. sloping terrain;
- e. proposed stormwater control features;
- f. nearest residences;
- g. Site access and interior access road(s);
- h. utility pads/electrical interconnection(s);
- i. clearing limits/property lines;
- j. mitigation areas; and
- k. 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 shown (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

- 36. Site Plan EC-1 includes the Town of Glastonbury. Revise the plan to include correct information.
- 37. Petition p. 7 has an error in the work hours. Provide corrected work hours that includes Town of Pomfret's requirements, as noted in the petition narrative.
- 38. Where would the construction staging area be located?
- 39. 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/Decommissioning

- 40. Revise the Operations and Maintenance Plan to include NDDDB species conservation measures. What entity will be performing vegetation management at the site? How will appropriate NDDDB conservation measures be communicated to vegetative maintenance personnel?
- 41. What is the cleaning interval of the solar panels? What substances would be used to clean the panels?
- 42. At what snow depth on the panels would energy output be negatively affected? At what snow depth would snow be removed from the panels?
- 43. Would the Petitioner store any replacement modules on-site? If so, indicate the storage location.
- 44. Is livestock grazing proposed for the site? If yes, provide a livestock management plan.
- 45. 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?

46. The Decommissioning Plan included with the Petition is for another site. Provide a site-specific Decommissioning Plan.