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June 16, 2022

Via Hand Delivery

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

Re: **Petition No. 1508 - Enfield Solar One, LLC and VCP, LLC d/b/a Verogy – Petition for a Declaratory Ruling that a Certificate of Environmental Compatibility and Public Need is not Required for the Construction, Operation and Maintenance of a 4.0 MWAC Solar Photovoltaic Project at 110 North Street, Enfield, Connecticut**

Dear Ms. Bachman:

Enclosed is an original and fifteen (15) copies of the Petitioners Responses to Siting Council Interrogatories in the above-referenced matter.

The Petitioner also respectfully requests an extension of time to respond to Question No. 23. The Noise Report for the proposed facility is nearing completion and will be submitted as soon as it is received.

Thank you in advance for your assistance and cooperation.

Sincerely,



Kenneth C. Baldwin

KCB/kmd
Enclosure

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

A PETITION FOR A DECLARATORY	:	PETITION NO. 1508
RULING THAT A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED IS NOT REQUIRED FOR THE	:	
CONSTRUCTION, OPERATION AND	:	
MAINTENANCE OF A 4.0 MW AC SOLAR	:	
PHOTOVOLTAIC PROJECT AT 110 NORTH	:	
STREET IN ENFIELD, CONNECTICUT	:	JUNE 16, 2022

**RESPONSES OF ENFIELD SOLAR ONE, LLC AND VCP, LLC
D/B/A VEROGY TO CONNECTICUT SITING COUNCIL INTERROGATORIES**

On May 24, 2022, the Connecticut Siting Council (“Council”) issued Interrogatories to Enfield Solar One, LLC and VCP, LLC d/b/a Verogy (“Petitioner”), relating to Petition No. 1508. Below are Petitioner’s responses.

Project Development

Question No. 1

What is the estimated cost of the project?

Response

The estimated cost of the project is \$9,800,000.

Question No. 2

If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?

Response

The following permits will be required for construction and operation of the Enfield Solar One facility. The Petitioner will obtain and hold the permits.

- a. Connecticut Department of Energy and Environmental Protection, General Permit for the Discharge of Stormwater and Dewatering Wastewater from Construction Activity.
- b. Town of Enfield, Building Permit.
- c. Town of Enfield, Electrical Permit.

Question No. 3

Referring to Petition p. 7, 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?

Response

During the Petitioners outreach with Town staff and the Enfield Planning and Zoning Commission, as described on page 7 of the Petition, the Town did not offer any recommendations for changes to the project's design or layout. Only one abutting property owner reached out to the Petitioner to ask about the project to better understand where it was going to be located on the Property. The Petitioner sent this property owner a larger version of the site layout map and offered to answer any additional questions.

Proposed Site

Question No. 4

Provide a map clearly depicting the boundaries of the **solar project site** and the boundaries of the host parcel (if different from the Limit of Disturbance). 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.

Response

The Overall Locus Map, included in Exhibit A, Plan Sheet OP-1 shows the Site boundary, a 73.88-acre parcel, with frontage and access directly to North Street in Enfield. Also depicted, within the limits of disturbance, are the proposed Facility improvements. The leased area for the Facility is, generally, the same as the limits of disturbance.

Question No. 5

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 within the lease 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.

Response

- a. The term of the Petitioners lease with the property owner is 20 years.
- b. The lease term can be extended for three (3) additional five (5) year terms.
- c. Yes, the language in Section 12.1 of the Lease includes provisions that relate to site restoration. Please see the relevant section below.

“Section 12.1 - Condition of Premises. Upon expiration or other termination of this Lease the Solar Array and any improvements constructed on, over, or under the Leased Premises by Tenant shall be removed by Tenant and the Leased Premises shall be restored to substantially the same condition as prior to the commencement of this

Lease, excluding normal wear and tear. All trade fixtures and signs, whether by law deemed to be a part of the realty or not, installed by the Tenant at any time or anyone claiming under the Tenant, shall remain the property of the Tenant or persons claiming under the Tenant and may be removed by the Tenant or anyone claiming under the Tenant at any time or times during the Lease Term. In the event this Lease terminates due to the expiration of the then applicable Lease Term, Tenant shall be afforded the term of thirty (30) days after such termination, as such time may be extended if Tenant is diligently pursuing the removal of the Solar Array, but not to exceed ninety (90) days, to remove all of its personal property, trade fixtures and signs for the Leased Premises including the Solar Array (which is deemed to be personal property) and Tenant shall pay the then existing Base Rent, calculated on a per diem basis, for any time period Tenant is removing personal property, trade fixtures, the Solar Array and/or signs.”

Question No. 6

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?

Response

No, the parcel is not a part of the Public Act 490 Program.

Question No. 7

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?

Response

No, the State of Connecticut Department of Agriculture has not purchased any development rights for the project site or any portion of the project site.

Question No. 8

Referring to Petition p. 12, provide the distance, direction and address of the nearest off-site residence from the solar field perimeter fence.

Response

The nearest off-site residence is located approximately 270 feet to the west of the facility fence line on property at 96 North Street. According to Enfield Land Records, this is a 7.9-acre parcel and is owned by FMW Maintenance Corporation. It is unclear if this residence is still occupied. A second residence at 117 North Street is located approximately 288 feet north of the facility fence line and north of North street. This is an approximately 24-acre parcel owned by Joseph Liquore.

Question No. 9

What is the operational life of the facility? If the facility will operate beyond the terms of the SCEF agreement, will the Petitioner decommission the facility or seek other revenue mechanisms for the power produced by the facility?

Response

The operational life of the Facility is 35 years. The Petitioner may continue to operate the Facility beyond the terms of the SCEF agreement should other revenue mechanisms for power supply be available at that time.

Energy Output

Question No. 10

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

Response

The Project's net capacity factor is estimated to be 21.45%. The expected degradation of the Facility is 0.5% annually.

Question No. 11

Is the project being designed to accommodate a future potential battery energy storage system? If so, where would it be located?

Response

Currently, Petitioner has no plans to incorporate a battery energy storage system (“BESS”). However, it is anticipated that in the event a BESS is incorporated at the site at a later date, it will be situated on the customer side of the existing DC/AC inverters and will not disrupt the existing interconnection approval with Eversource.

Question No. 12

Would the Petitioner participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?

Response

No, the Petitioner will not participate in the ISO-NE Forward Capacity Auction, as Eversource owns the capacity rights of any SCEF program Facility. However, at the conclusion of the SCEF tariff the Petitioner may choose to participate in a future ISO-NE Forward Capacity Auction.

Question No. 13

Is the project subject to a virtual net metering agreement? Would total project output be dedicated to virtual net metering?

Response

The Project is part of the SCEF program and therefore cannot enter into a virtual net metering agreement.

Question No. 14

Does the Petitioner have a contract to sell electricity and renewable energy certificates (RECs) it expects to generate with the proposed project? If so, to which public utility? If the electricity is to be sold to more than one public utility, provide the percentage to be sold to each public utility.

Response

The Petitioner has a contract with Eversource to sell 100% of the electricity and renewable energy certificates that will be generated by the Facility.

Site Components and Solar Equipment

Question No. 15

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 livestock grazing?

Response

Most of the wiring will be run on the racking itself. Where wiring is not run on the racking, it would run in conduit. All PV wire is weather proof and rated up to 194°F.

Question No. 16

Is a storage shed proposed for livestock shelter or equipment storage?

Response

No storage shed is proposed for a livestock shelter or equipment storage.

Interconnection

Question No. 17

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

Response

Yes, the Project was required to be reviewed by ISO-NE as part of the interconnection application process with Eversource. The Petitioner has a signed interconnection agreement with Eversource.

Question No. 18

Would any off-site upgrades to the electrical distribution system be required? If so, describe.

Response

Petitioner initially filed interconnection applications with Eversource Energy, conducted Distribution System Impact Studies through Eversource, and earlier in July of 2021, signed an Interconnection Agreement (“IA”) with Eversource. As part of the IA, Eversource identified the need for a 1,100 foot, three-phase line extension along North Street from Park Street to the west.

Question No. 19

What is the approximate height of the five utility poles?

Response

The five proposed utility poles would be 40-45 feet tall.

Public Safety

Question No. 20

In the event of a fire or emergency, describe procedures that will allow emergency responders to shut down the facility.

Response

In the event of a fire or emergency, the Facility will be able to be shut down by emergency responders via a physical disconnect switch that will be appropriately labeled pursuant to the requirements of the National Electric Code. The Petitioner is prepared to provide assistance and/or training to local emergency responders if needed.

Question No. 21

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?

Response

There are wells associated with the surrounding properties to the east, north, and west of the solar arrays. There are no anticipated ground water impacts from Facility construction. Vibrations from installation of the racking system are not expected to cause sediment releases, and no disruption to well water flow or quality is anticipated. As a result, no special precautions are warranted.

Question No. 22

Would the project comply with the National Electrical Code, the National Electrical Safety Code and any applicable National Fire Protection Association codes and standards including, but not limited to, NFPA Code Section 11.12.3?

Response

Yes.

Question No. 23

What is the status of the noise study referenced on page 34 of Petition Exhibit G – Environmental Assessment? Would the proposed project meet applicable Department of Energy and Environmental Protection noise standards at the property boundaries?

Response

A Noise Study for the Project is in-process and will be submitted to the Council shortly.

Environmental

Question No. 24

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, including, but not limited to, water quality impacts from animal waste related to sheep grazing on the site. At what point would the Petitioner apply for a Stormwater Permit and a Dam Safety Permit (if required)?

Response

Yes, the Petitioner met with staff at the DEEP Stormwater Division and Dam Safety Unit, on February 24, 2022. During this meeting all elements of the Project were reviewed including the use of sheep grazing within the Facility. No comments or concerns about the Project were raised by the Stormwater Division or any other Division at that time. The Petitioner expects to apply for the Stormwater General Permit within in the coming weeks. The Project's stormwater basin will hold less than 3 acre-feet of water. Therefore, a Dam Safety Permit is not required.

Question No. 25

Is livestock grazing an integral component of the project? Could the paddock/grazing locations at the site be modified in the future?

Response

Yes. Incorporating livestock grazing into the Project was included in the Petitioner's proposal to the Connecticut Department of Agriculture ("DoAg") and is referenced as an appropriate agricultural co-use in the DoAg's March 16, 2022 "no material affect" letter submitted to the Council. Paddock grazing and locations may be modified in the future by the livestock manager as required to meet the needs of the site and the flock.

Question No. 26

Would the Petitioner be willing to plant landscape shrubs along the north fence line? If yes, provide a landscape plan.

Response

The Petitioner does not believe that additional landscaping along the northern fence line is warranted for this Project. The mature trees and split rail fence that currently exist along a portion of the northern boundary of the Property will remain. The abutting properties to the north are zoned Industrial and used, in large part, for industrial and agricultural purposes.

Question No. 27

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 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.

Response

See attached Remote Field Review.

Maintenance/Decommissioning

Question No. 28

What is the cleaning interval of the solar panels? What methods would be used to clean the panels?

Response

The installed solar panels do not require regular cleaning as they would be cleaned by regular rain events.

Question No. 29

At what snow depth on the panels would energy output be negatively affected?

Response

The Petitioner does not expect snow depth to negatively affect the energy output of the system as the snow would have to reach a depth of three (3) feet for an extended period of time to impact the panels.

Question No. 30

Would the Petitioner store any replacement modules on-site? If so, indicate the storage location.

Response

No.

REMOTE FIELD REVIEW



CONNECTICUT SITING COUNCIL PETITION NO. 1508
"ENFIELD SOLAR ONE, LLC"
110 NORTH STREET
ENFIELD, CT

PREPARED FOR:



PREPARED BY:

ALL-POINTS TECHNOLOGY CORPORATION, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385

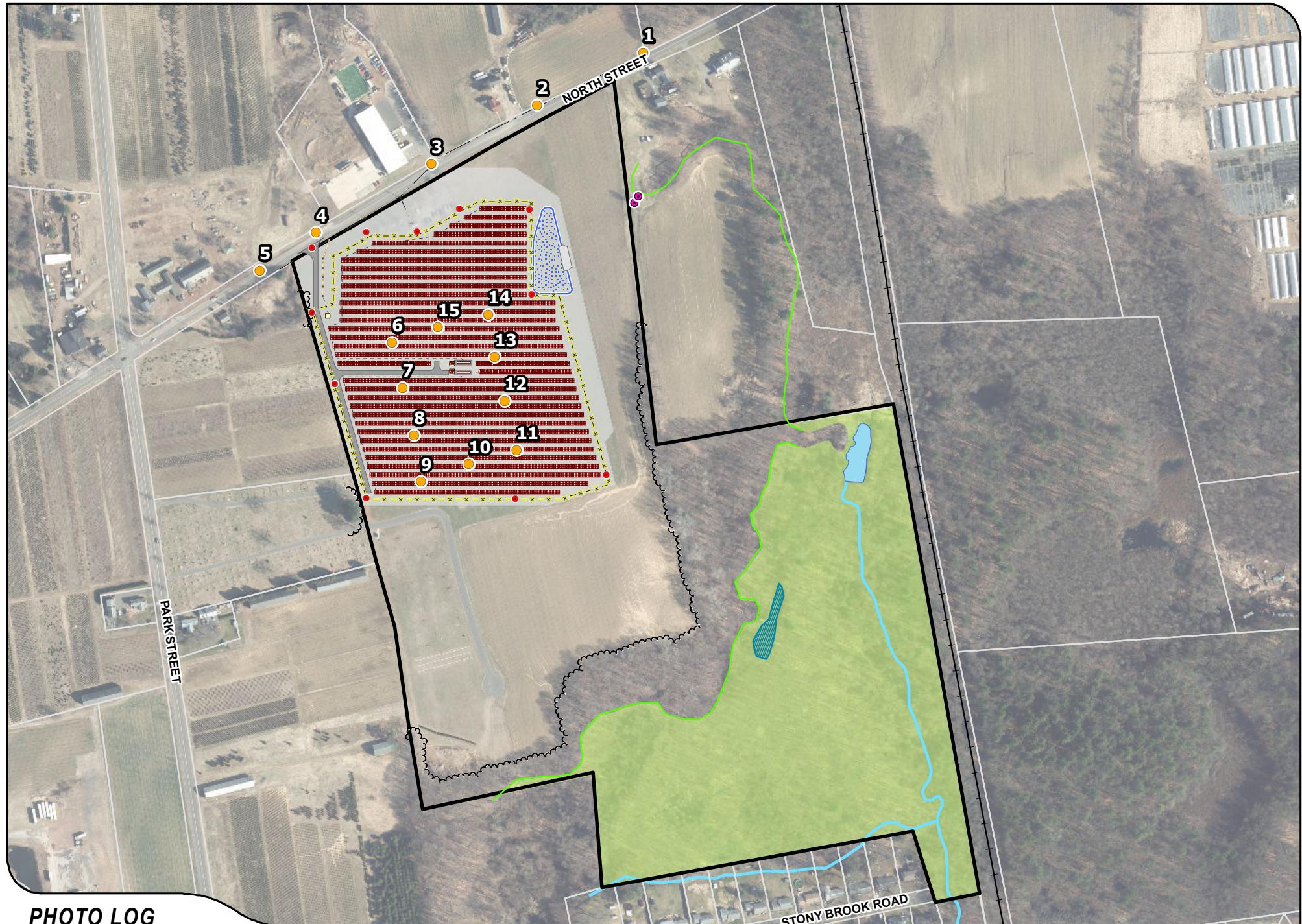


PHOTO LOG

Legend:

- Photo Locations
- Photo Markers
- Site
- Approx. Parcel Boundary
- Railroad
- Existing Utility Poles
- Treeline
- Overhead Utility Lines
- Existing Culvert
- Vernal Pool
- Existing Farm Pond
- Approximate Watercourse
- Existing Wetland
- Wetland Area
- Concrete Pad
- Gravel Access Drive
- Stormwater Basin
- Stormwater Gravel Outfall
- Perimeter Fence
- Underground Electrical Path
- Interconnection Path
- Interconnection Utility Pole

Scale: 1 inch = 400 feet

North arrow: N

VEROGY
Proposed Enfield Solar One
Solar Facility
110 North Street
Enfield, Connecticut

ALL-POINTS
TECHNOLOGY CORPORATION

PROPOSED FENCE CORNER



EXISTING

PHOTO

1

DESCRIPTION

NORTH STREET LOOKING SOUTHWEST





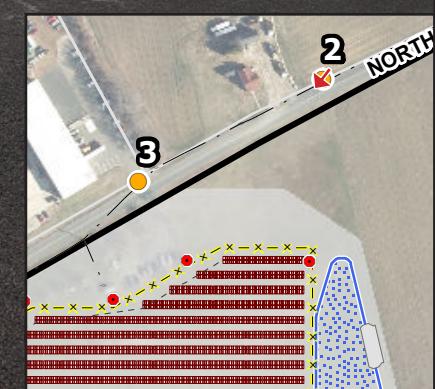
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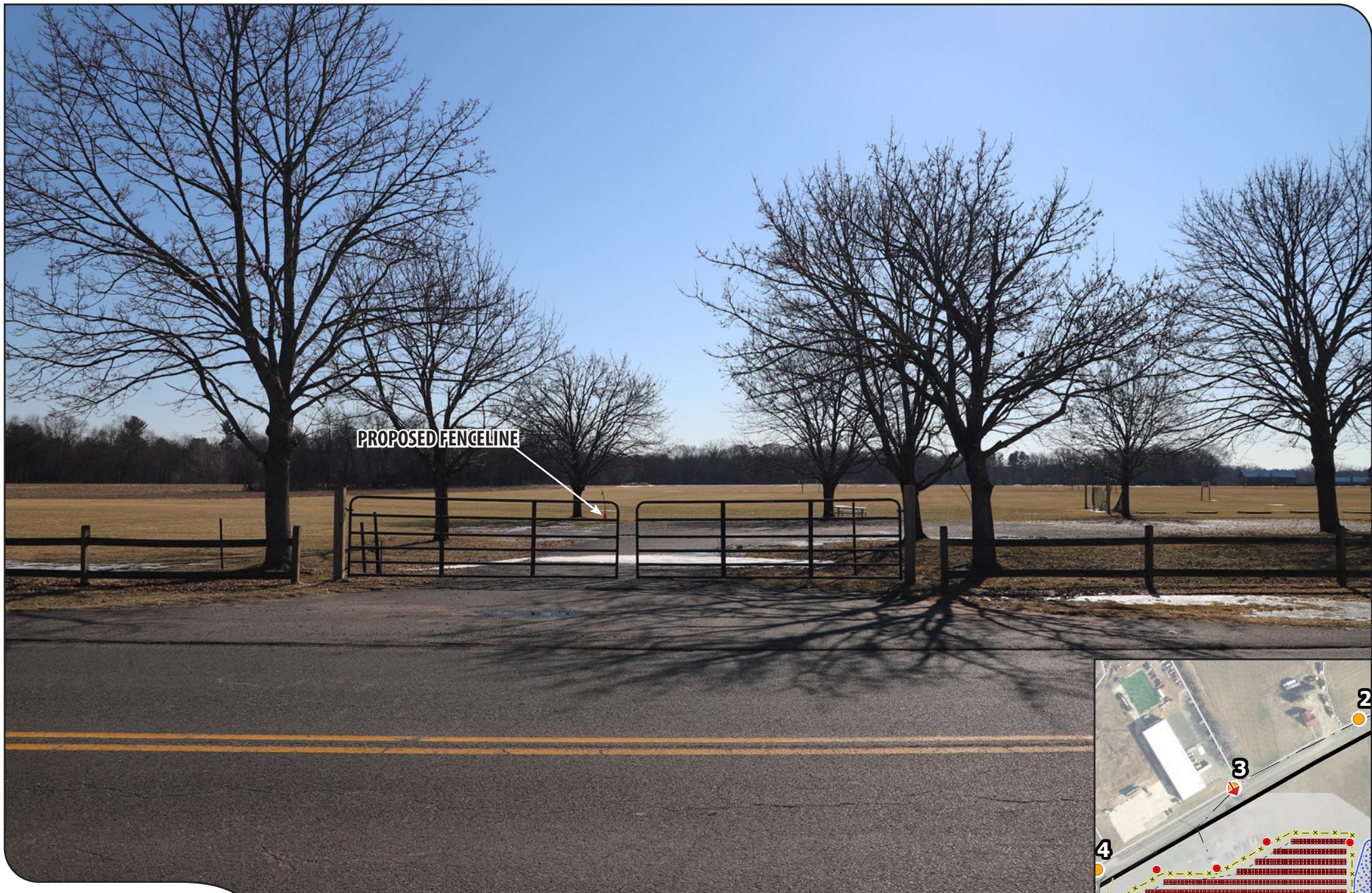
PHOTO

2

DESCRIPTION

NORTH STREET LOOKING SOUTHWEST





EXISTING

PHOTO

3

DESCRIPTION

NORTH STREET LOOKING SOUTHEAST



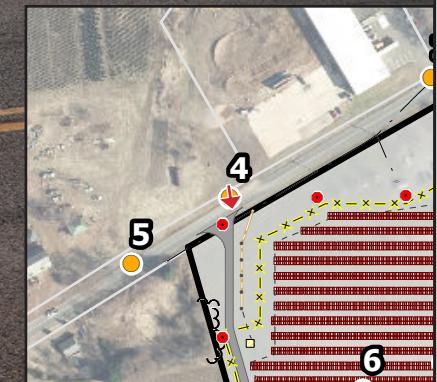
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PHOTO

4

DESCRIPTION

NORTH STREET LOOKING SOUTH



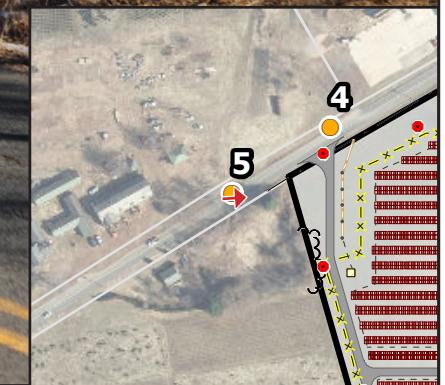


EXISTING

PHOTO

5

DESCRIPTION
NORTH STREET LOOKING EAST



PHOTOGRAPHED ON 3/9/2022



PHOTO

6A

DESCRIPTION

LOOKING WEST

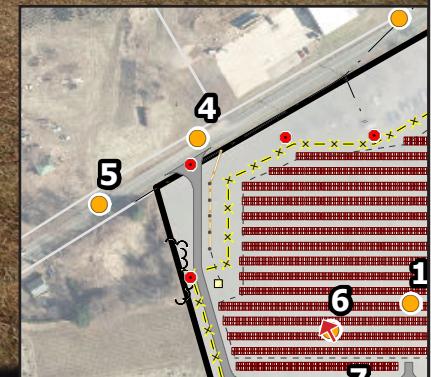


PHOTO

6B

DESCRIPTION

LOOKING NORTHWEST







EXISTING

PHOTO

7B

DESCRIPTION

LOOKING SOUTHWEST





EXISTING

PHOTO

8B

DESCRIPTION

LOOKING SOUTHWEST





EXISTING

PHOTO

9B

DESCRIPTION

LOOKING EAST



EXISTING

PHOTO

10A

DESCRIPTION

LOOKING SOUTHWEST





EXISTING

PHOTO

10C

DESCRIPTION

LOOKING NORTH





EXISTING

PHOTO

11B

DESCRIPTION

LOOKING SOUTHEAST

PHOTOGRAPHED ON 2/29/2022



PHOTO

12A

DESCRIPTION

LOOKING SOUTHEAST

PHOTOGRAPHED ON 2/9/2022



EXISTING

PHOTO

12B

DESCRIPTION

LOOKING NORTHEAST



EXISTING

PHOTO

13A

DESCRIPTION

LOOKING SOUTH



EXISTING

PHOTO

13B

DESCRIPTION

LOOKING NORTHEAST



EXISTING

PHOTO

14A

DESCRIPTION

LOOKING SOUTHEAST

PROPOSED FENCE CORNER

PROPOSED FENCELINE

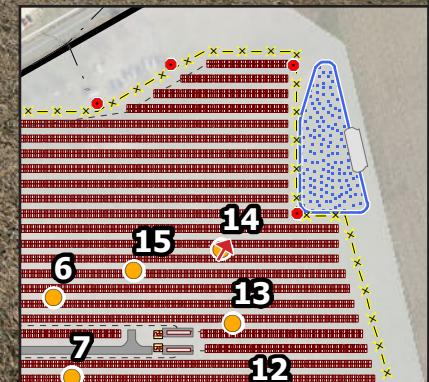
EXISTING

PHOTO

14B

DESCRIPTION

LOOKING NORTHEAST



PHOTOGRAPHED ON 2/9/2022

PROPOSED FENCELINE

PROPOSED FENCE CORNER

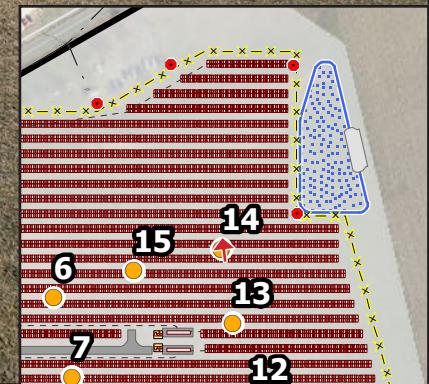
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PHOTO

14C

DESCRIPTION

LOOKING NORTH



PHOTOGRAPHED ON 2/29/2022



EXISTING

PHOTO

14D

DESCRIPTION

LOOKING NORTHWEST

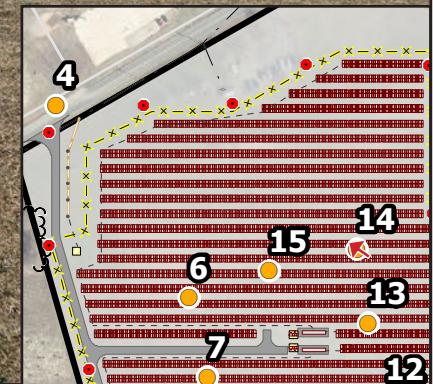




PHOTO	DESCRIPTION
15A	LOOKING NORTHEAST



EXISTING

PHOTO

15B

DESCRIPTION

LOOKING SOUTH