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January 26, 2023

Via Electronic Filing and Hand Delivery

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

Re: Petition of VCP FX CT, LLC for Declaratory Ruling for the Construction, Operation, and Maintenance of a 1.5 MW AC Roof-Mounted Solar Photovoltaic Electric Generating Facility at FedEx Distribution Center, 49 FedEx Drive, Middletown, Connecticut

Dear Ms. Bachman:

Enclosed is an original and fifteen (15) copies of the Petitioners Responses to the Connecticut Siting Council interrogatories in the above-reference project.

If you have any questions concerning this submittal, please contact me at your convenience. Please note our new address for all future correspondence.

Sincerely,



Bradley J. Parsons
Director of Design and Permitting

Petition No. 1550
VCP FX CT, LLC d/b/a Verogy
Fed Ex Distribution Center, 49 FedEx Drive
Middletown, Connecticut
Responses to Interrogatories
Set One
January 9, 2023

Project Development

1. What is the estimated cost of the project?

The estimated cost of the project is \$3,300,000.

2. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?

No, this project will not be undertaken by the state or funded by any state grants or contracts.

3. Referencing page 11 and Appendix D of the Petition, has the City of Middletown, the Town of Berlin, the Town of Cromwell, and/or any abutters provided comments to Verogy since the Petition filing? If so, please summarize the comments and how these comments were addressed.

The Petitioner has not received any comments or concerns from the City of Middletown, the Town of Berlin, the Town of Cromwell, or any abutters regarding the project.

4. Referencing page 4 of the Petition, the LREC contract is for a period of 15 years.

a. Can this contract be extended/renewed?

LREC contracts are for fixed period of 15 years and cannot be extended or renewed.

b. If there is no provision for extension or renewal, would the Petitioner decommission the facility at that time or seek other revenue mechanisms for the power produced by the facility?

At the conclusion of the LREC contract term, the project would sell its Class I RECs on the spot market.

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

The project will obtain and hold a building and electrical permit with the City of Middletown.

Proposed Site

6. In the lease agreement with the property owner 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.

The Petitioner has a Power Purchase Agreement with the property owner that requires the removal of the system upon the expiration of the agreement.

7. What is the height of the building roof above grade?

The height of the building roof above grade varies from approximately 71 feet on the southside to 79 feet on the northside.

8. Provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar facility.

The nearest property line of the Site is located approximately 445 feet to the west. The nearest off-site residence is 1021 Middle Street, located approximately 530 feet to the west.

Energy Output

9. Would the power output of the solar panels decline as the panels age? If so, estimate the percent per year.

Project electricity production is expected to decline one half of one percent (0.5%) per year.

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

It is unclear at this time if the project would participate in the ISO-NE Forward Capacity Auction, but the Petitioner reserves the right to participate in that auction should they so choose.

11. Petition p. 11 states, "...the Project will generate the majority of its power during the summer electrical peak, thereby providing *peaking resources* when the state has its greatest need for energy." (Emphasis added). ISO-NE generally defines peaking resources as quick-start, dispatchable resources that typically operate less than 10% of the year. Would a more accurate statement be that the Project would help serve summer peak loads? Explain.

Yes, it is more accurate to state that this project would help to serve summer peak loads.

Site Components and Solar Equipment

12. Provide a side profile drawing to depict the solar panel angle with the horizontal, and the maximum and minimum heights of the arrays above the roofline.

See Exhibit 1 for a side profile drawing showing the solar panel angle above the roofline. The panels are in portrait orientation facing south and are flush mounted to the building at the same slope as the roof. The top face of the panels will be approximately 6 inches off the top of the roof. The roof is approximately 71 feet high on the southern side and approximately 79' high on the northern side.

13. What is the proposed equipment shown in yellow on Figure 3 of the Petition? Is it located on the ground? What are the dimensions?

The proposed equipment shown in yellow is electrical switchgear for the PV system that will be located on the ground. It measures approximately 15 feet wide, 5 feet deep, & 7 feet high.

14. To what depth would the proposed electrical conduit shown on Figure 3 of the Petition be buried?

The proposed electrical conduit would be buried at least 18 inches below grade.

15. Provide the dimensions of the transformer and inverter pads.

The proposed system is behind the meter; therefore, no new service transformer is required. The inverters are to be located on the roof; therefore, pads will not be necessary for this equipment.

Interconnection

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

Yes, the project is required to be reviewed by ISO-NE as part of the interconnection application and study process with Eversource Energy.

17. Referencing page 7 of the Petition, what is the status of the interconnection application with Eversource?

Eversource is nearing completion of the impact study for this project and has provided a preliminary indication that this project will not impact their system.

Public Safety

18. With regard to emergency response:

a. Would training be provided to local emergency responders in the event of a fire or other emergency occurs at the site?

The Petitioner is prepared to provide assistance and/or training to local emergency responders if needed.

b. How would site access be ensured for emergency responders? Would a shut-off switch be located a ground level?

There would be an emergency shut-off switch with appropriate signage accessible to emergency responders at ground level.

19. If there is a structure fire or rooftop fire, what substances (water, foam, etc.) can be used on the solar array to extinguish the fire?

Any substance that the fire department deems as appropriate can be used on the solar array to extinguish the fire, including the use of water, foam, or other approved department substances.

20. What structural standards and codes were applied to the design of the roof-mount solar panel racking system? What wind speed was used in the design calculations?

All applicable State of Connecticut building and electrical codes will be applied to the design of the roof-mount solar panel racking system. The design wind speed for this Site is 120 mph.

Environmental

- 21. Referencing page 20 of the Petition, please provide a map showing the referenced recreational areas and the distance of each from the site.**

See Exhibit 2

- 22. Petition p. 3 lists residential use to the west of the site. Would the project be visible from these residential areas? Characterize any expected visibility.**

Some visibility of the project is possible from these residential areas. We would characterize the visibility as minor in nature and commensurate with current visibility of the rooftop as it currently exists without the proposed solar panel installation.

- 23. Are there any national, state and/or locally-designated scenic roads near the proposed site? If yes, describe the visibility of the proposed project from these road(s).**

There are no scenic roads located near the site. The nearest scenic road is Ferry Lane in Glastonbury, located approximately 6.5 miles northeast of the project site. Based on existing topography and vegetation, the Project Site will not be visible from this scenic road.

- 24. Where is the nearest national, state and/or locally-designated historic area from the proposed site? Describe the visibility of the proposed project from the nearby historic area(s).**

The nearest historic area is the Worthington Ridge Historic District, located approximately 2 miles northwest of the project site. Based on existing topography and vegetation, the Project Site will not be visible from this historic area.

- 25. Provide a photo simulation of the proposed facility.**

See Exhibit 3, a Photo Log showing views of the building from various locations. The top of the roof is slightly visible from Middle Street. The addition of panels to this roof will not substantially change the visibility of the top of the roof.

Facility Construction

- 26. Which code(s) govern stormwater drainage on roofs, e.g. Connecticut State Building Code, International Building Code, etc.? Would the rooftop drainage system remain in compliance with such code(s) post-construction, or would any upgrades to the roof's drainage system be necessary for compliance?**

There are no impacts to the rooftop drainage system thus no upgrades to the roof drainages systems are necessary.

- 27. Would the proposed installation affect existing rooftop stormwater drainage? How is rooftop stormwater captured and where is it discharged?**

The proposed installation would not affect the existing rooftop stormwater drainage system. The rooftop stormwater is captured and discharged to the subsurface drainage system for the adjacent paved parking and access areas.

28. Where would the construction staging area be located?

The construction staging area is currently planned to be in an under-utilized existing paved on-site parking area located northwest of the building.

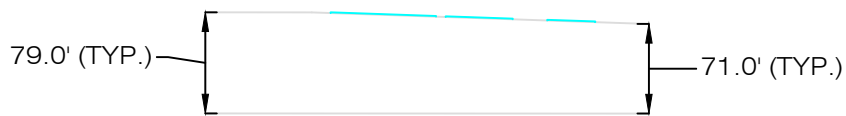
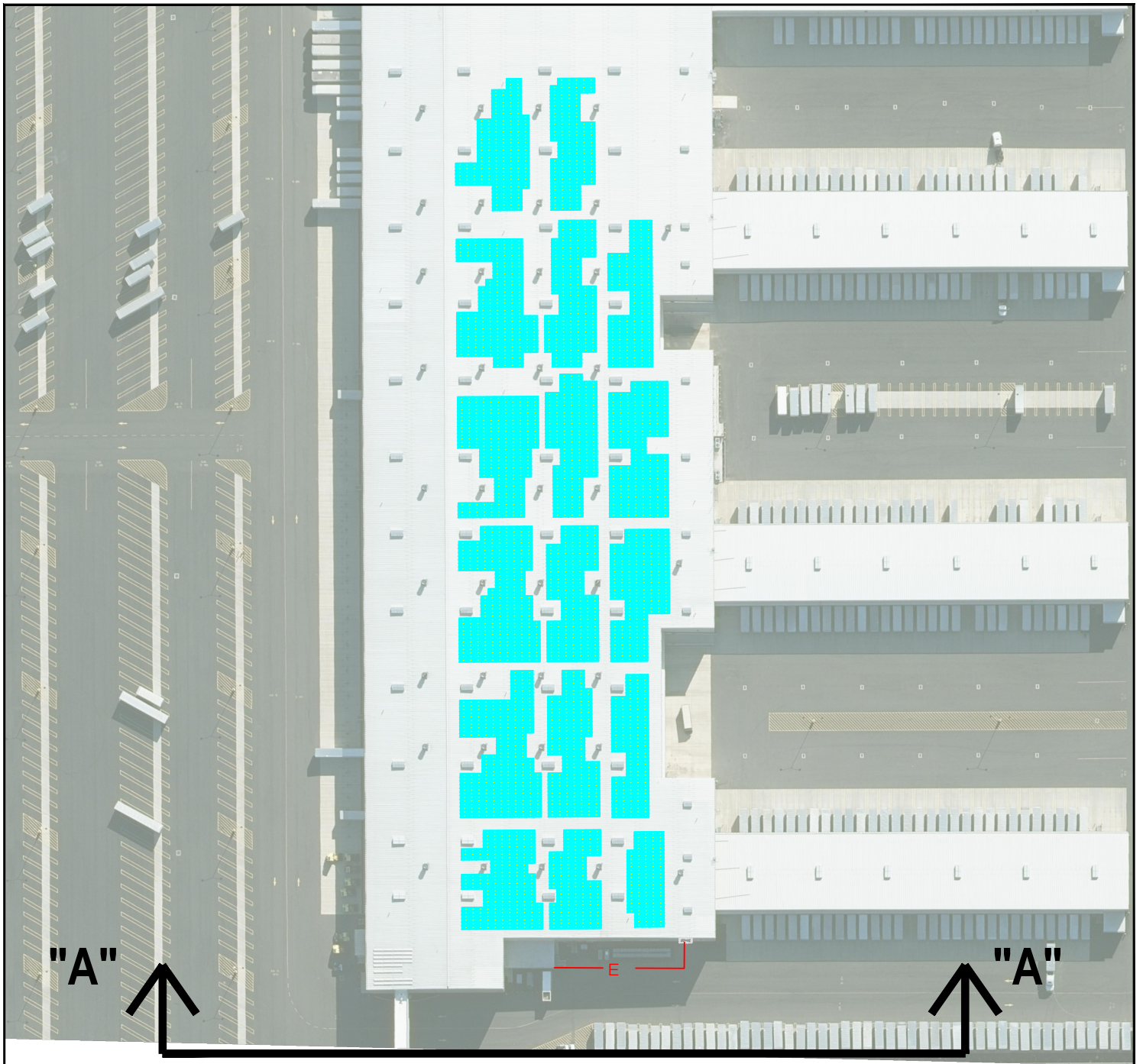
29. Although the ground equipment identified in Figure 3 is located outside of the designated flood zone, what is the cost to elevate the ground equipment an additional foot above mean sea level?

The ground equipment is located on the west side of the existing building and the flood zone is on the east side of the building over 1,000 feet from the proposed equipment. The Petitioner does not think that elevating the equipment pads on the ground an additional foot is warranted.

Maintenance/Decommissioning

30. Would the petitioner store any replacement modules on-site in the event solar panels are damaged or are not functioning properly? If so, where? How would damaged panels be detected?

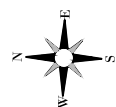
The Petitioner would not store replacement modules on site. They will be stored in a warehouse off-site. Damaged panels would be detected through routine maintenance, inspection, and remote system monitoring.

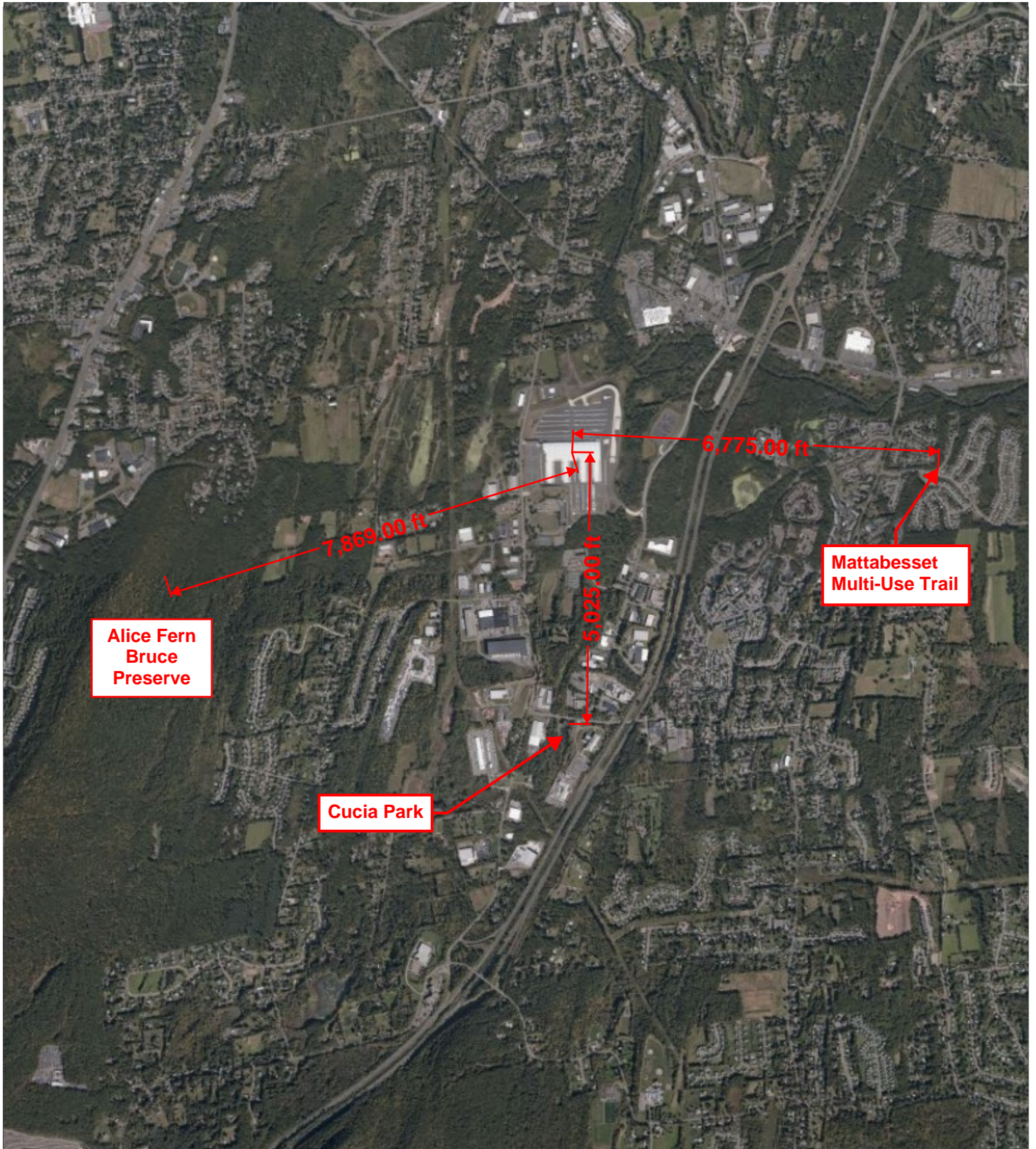


SECTION "A-A"

Proposed Building Section
(Looking East)
January 2023

1.5 MW Roof-Mounted Solar Project
Federal Express Distribution Center
49 Fedex Drive, Middletown, CT





Alice Fern
Bruce
Preserve

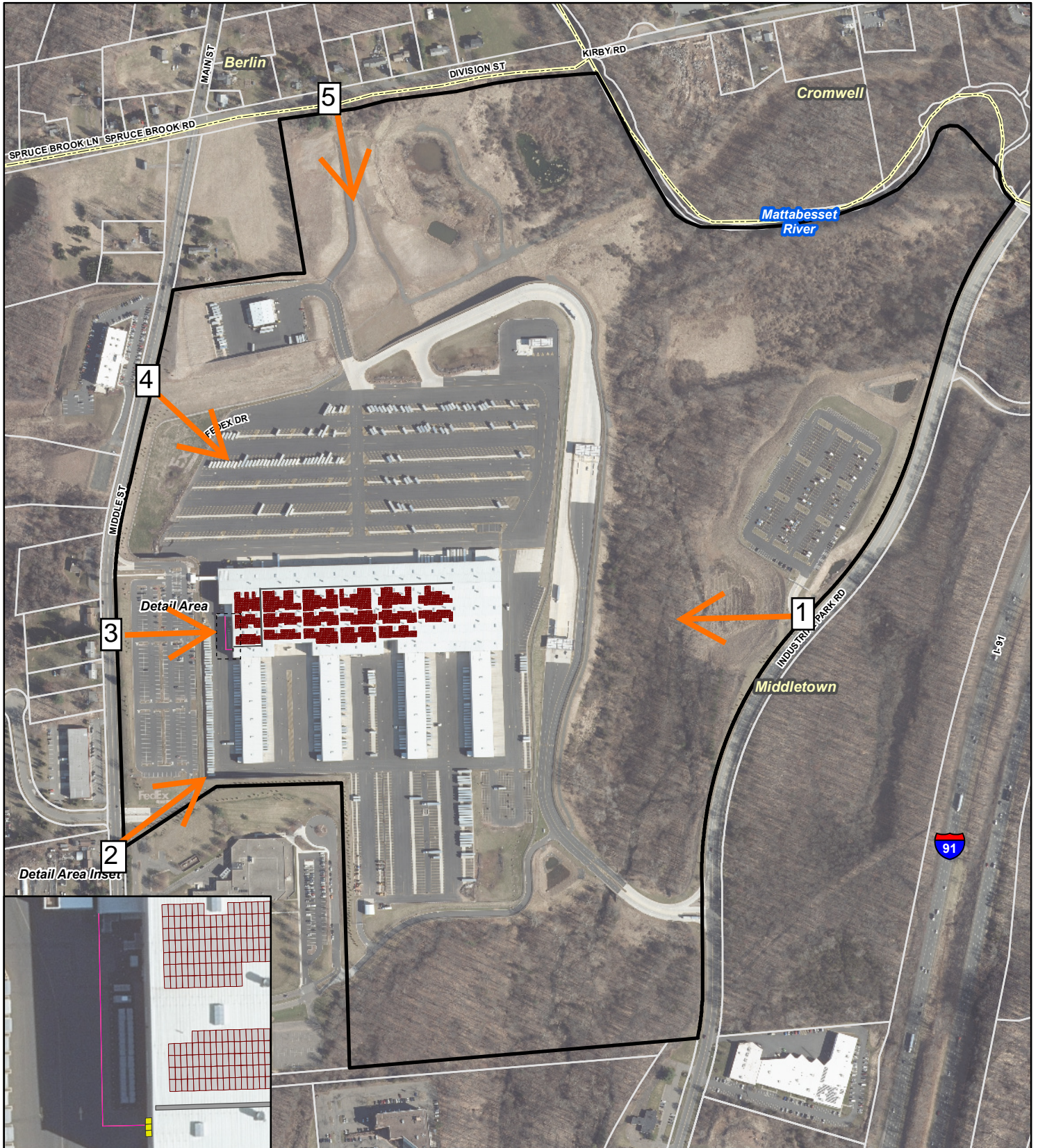
Cucia Park

Mattabeset
Multi-Use Trail







Recreational Areas
January 2023

1.5 MW Roof-Mounted Solar Project
Federal Express Distribution Center
49 Fedex Drive, Middletown, Connecticut





Legend

-  Site
-  Proposed Solar Modules
-  Proposed Equipment
-  Proposed Cable Tray
-  Proposed Electrical Conduit
-  Approximate Parcel Boundary

Proposed Conditions
Photo Log Map
 November 2022

1.5 MW Roof-Mounted Solar Project
 Federal Express Distribution Center
 49 Fedex Drive, Middletown, Connecticut

Data Sources:
 Aerial Base Map: State of Connecticut 2019 aerial imagery CTECO

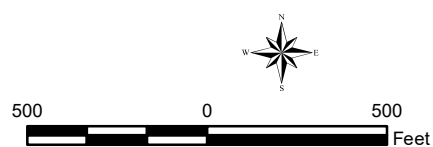




Photo #1 Description: Taken from Industrial Park Road looking west (roof is NOT visible).

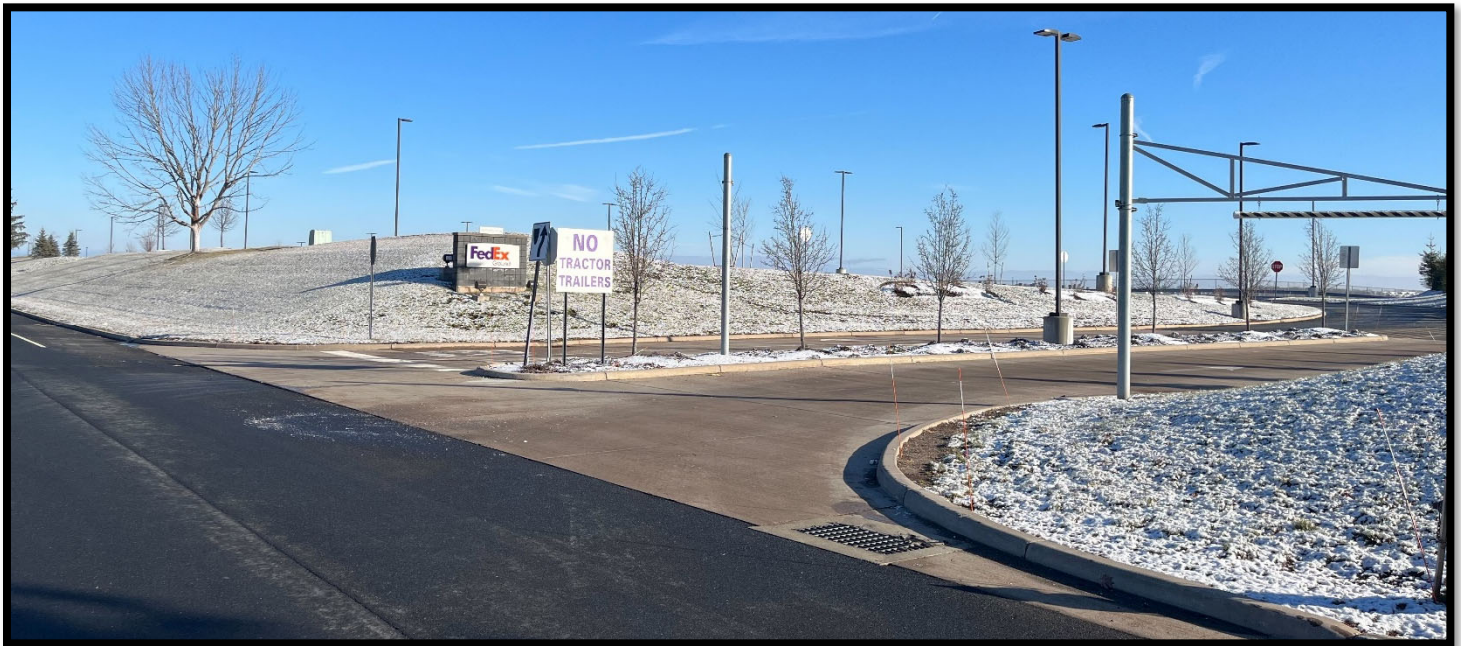


Photo #2 Description: Taken from Middle Street at intersection with Philmack Drive looking northeast (roof is NOT visible).

1.5 MW Roof-Mounted Solar Project
 Federal Express Distribution Center
 49 Fedex Drive, Middletown, Connecticut





Photo #3 Description: Taken from approximately 1031 Middle Street looking east (roof barely visible).



Photo #4 Description: Taken from Middle Street at intersection with Philmack Drive looking northeast (roof is NOT visible).

1.5 MW Roof-Mounted Solar Project
 Federal Express Distribution Center
 49 Fedex Drive, Middletown, Connecticut





Photo #5 Description: Taken from Division Street looking south (roof not visible).

1.5 MW Roof-Mounted Solar Project
Federal Express Distribution Center
49 Fedex Drive, Middletown, Connecticut

