VCP FX CT, LLC

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 1.5 MW AC ROOF-MOUNTED SOLAR PHOTOVOLTAIC PROJECT AT FEDERAL EXPRESS DISTRIBUTION CENTER, 49 FEDEX DRIVE, MIDDLETOWN, CONNECTICUT

NOVEMBER 18, 2022

PREPARED FOR THE CONNECTICUT SITING COUNCIL

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STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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A 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 1.5 MW AC ROOF-MOUNTED SOLAR PHOTOVOLTAIC PROJECT AT FEDEX DISTRIBUTION CENTER, 49 FEDEX DRIVE, MIDDLETOWN, CONNECTICUT	:	PETITION NO. ____
	:	NOVEMBER __, 2022

PETITION FOR A DECLARATORY RULING:
INSTALLATION HAVING NO
SUBSTANTIAL ADVERSE ENVIRONMENTAL EFFECT

I. INTRODUCTION

Pursuant to the Connecticut General Statues ("CGS") Section 4-176(a) and 16-50k(a) and Section 16-50j-38 *et seq.* of the Regulations of Connecticut State Agencies ("RCSA"), VCP FX CT, LLC (the "Petitioner" or "Verogy") respectfully petitions the Connecticut Siting Council (the "Council") to approve, by declaratory ruling, the Petitioner's proposed installation and development of a 1.50 megawatt ("MW") alternating current ("AC") solar-based electric generating facility (the "Facility" or "Project") sited on the rooftop of the FedEx Distribution Center located at 49 FedEx Drive, Middletown, Connecticut (the "Site").[1]

CGS Section 16-50k(a) states, in relevant 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 . . . (B) the construction or location of any . . . 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 Environmental Protection [and], (ii) the council does not find a substantial adverse environmental effect…,

[1] The Petitioner notes that the Site has a previously approved Petition from the Connecticut Siting Council, Petition No. 1332, for a 1 MW fuel cell by Bloom Energy Corporation.

Pursuant to CGS Section 16-50k(a), Petitioner respectfully requests that the Council approve this Project by declaratory ruling. As described more fully in this petition, the proposed Project will result in no air emissions, has no impacts to natural resources, and complies with the applicable air and water quality standards of the Connecticut Department of Energy and Environmental Protection ("CT DEEP"). In addition, the Project will not have an adverse environmental effect in the State of Connecticut and will contribute to the State's efforts of deploying clean, renewable energy sources.

II. PETITIONER AND CONTACT INFORMATION

The legal name of the Petitioner is VCP FX CT, LLC. Verogy is a Connecticut limited liability company with its principal place of business in Hartford, Connecticut. Verogy is a professional renewable energy business with decades of experience in the solar industry; the core of its business is developing, financing, constructing, managing, and operating solar projects.

Mailing Address:	VCP FX CT, LLC 150 Trumbull Street, 4th Floor Hartford, CT 06103
Internet Address(es):	https://www.verogy.com/

Correspondence and other communications concerning the Project are to be addressed to, and notices, orders and other papers may be served upon the following:

Brian Smith VCP FX CT, LLC 150 Trumbull St., 4th Floor Hartford, CT 06103 bsmith@verogy.com (860) 288-7215 x705	James Cerkanowicz VCP FX CT, LLC 150 Trumbull St., 4th Floor Hartford, CT 06103 jcerkanowicz@verogy.com (860) 288-7215	Bradley Parsons VCP FX CT, LLC 150 Trumbull St., 4th Floor Hartford, CT 06103 bparsons@verogy.com (860) 288-7215 x715

All three individuals consent to electronic mailings of all Council and Petition-related correspondence.

III. THE PROJECT

A. Project Overview

The Project was selected and awarded a fifteen-year contract for up to 2.0 MW AC to participate in the Connecticut Low Emissions Renewable Energy Credit ("LREC") program. The Project will help offset FedEx's energy usage on Site; help meet FedEx's sustainability goals; and help Connecticut meet its emission reduction targets via the State of Connecticut's Renewable Portfolio Standard and meet the Governor's goal of becoming carbon neutral by 2040.

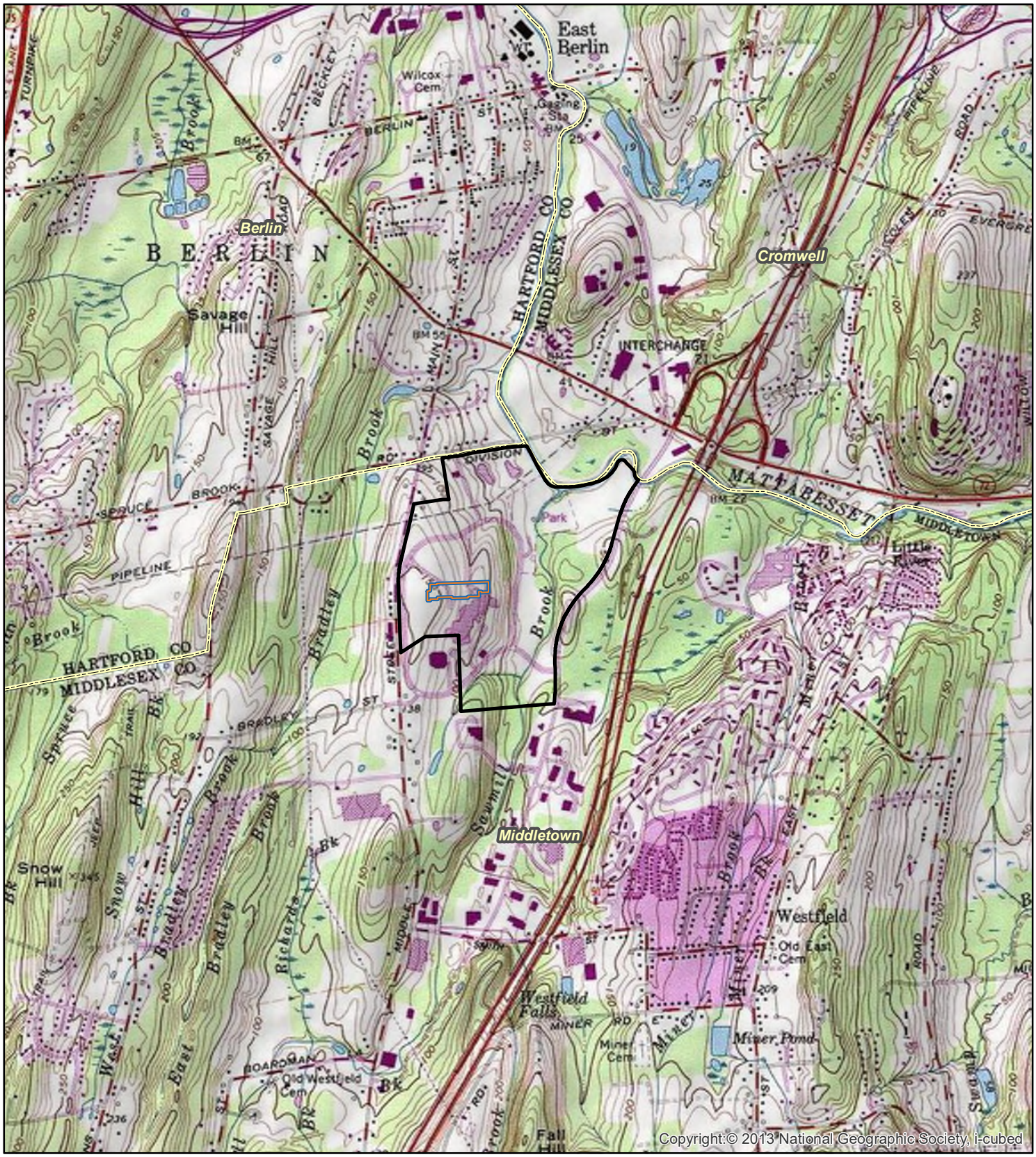
B. Site Description

The Site is a 204.84-acre parcel, located in the City of Middletown's IT Industrial Zone at 49 Fedex Drive, Middletown, Connecticut. The Site is currently a developed parcel that is owned and operated by FedEx Ground Package System, Inc. and serves as one of their distribution centers for the northeast. The existing building and associated parking lot and infrastructure were constructed in 2018 and encompasses about two-thirds of the central & western portions of the Site, with a small satellite parking area on the eastern portion of the site. The remaining area of the Site to the north and east of the building and parking area is comprised of a forested wetland system, including the Sawmill Brook. The Site is bordered on the north by Division Street & the Mattabesset River, to the east by Industrial Park Drive, to the south by industrial & undeveloped properties, and to the west by Middle Street, containing a mix of commercial and residential properties on the west side of Middle Street.

See Figure 1 (Location Map), Figure 2A (Existing Conditions Map), and Figure 2B (Existing Cover Type Map) for a depiction of the Site and Project area.

C. Site Selection

The site selection for the Project was based on an evaluation of several key criteria, including but not limited to: (i) the building owner desired to locate the Facility on the roof of their existing building; (ii) proximity to critical infrastructure, including suitable electrical grid access; (iii) compatibility with surrounding land use; and (iv) the Facility's construction and subsequent operation is not expected to have any undue adverse environmental impacts on the surrounding area.



Legend

- Site
- Project Area
- Municipal Boundary (CTDEEP)

Site Location Map

November 2022

1.5 MW Roof-Mounted Solar Project

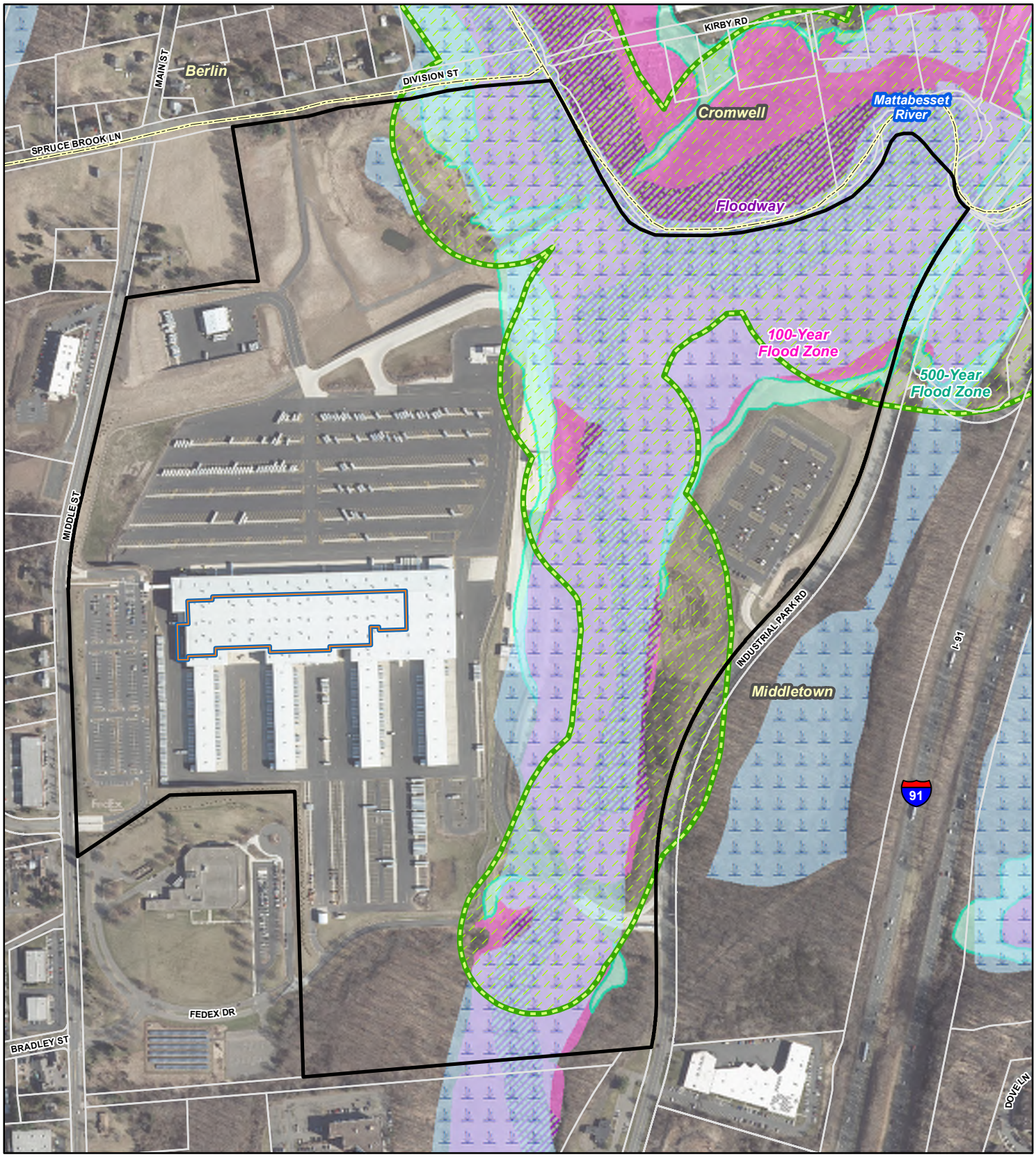
Federal Express Distribution Center
49 Fedex Drive, Middletown, Connecticut

1,000 0 1,000 Feet

Figure 1

Source: USGS 7.5 Minute Topographic Quadrangle Map, Middletown, CT (1992)

VEROGY



Legend

- Site
- Project Area
- Approximate Parcel Boundary
- 5-foot Contour Line
- Natural Diversity Database Area (Aug 2022)
- Critical Habitat (Oct 2019)*
- Wetlands (CTDEEP)
- Tidal Wetland*
- Aquifer Protection Area (Jan 2022)*

FEMA Flood Zones

- 100-Year Flood Zone
- 500-Year Flood Zone
- Floodway

Existing Conditions

November 2022

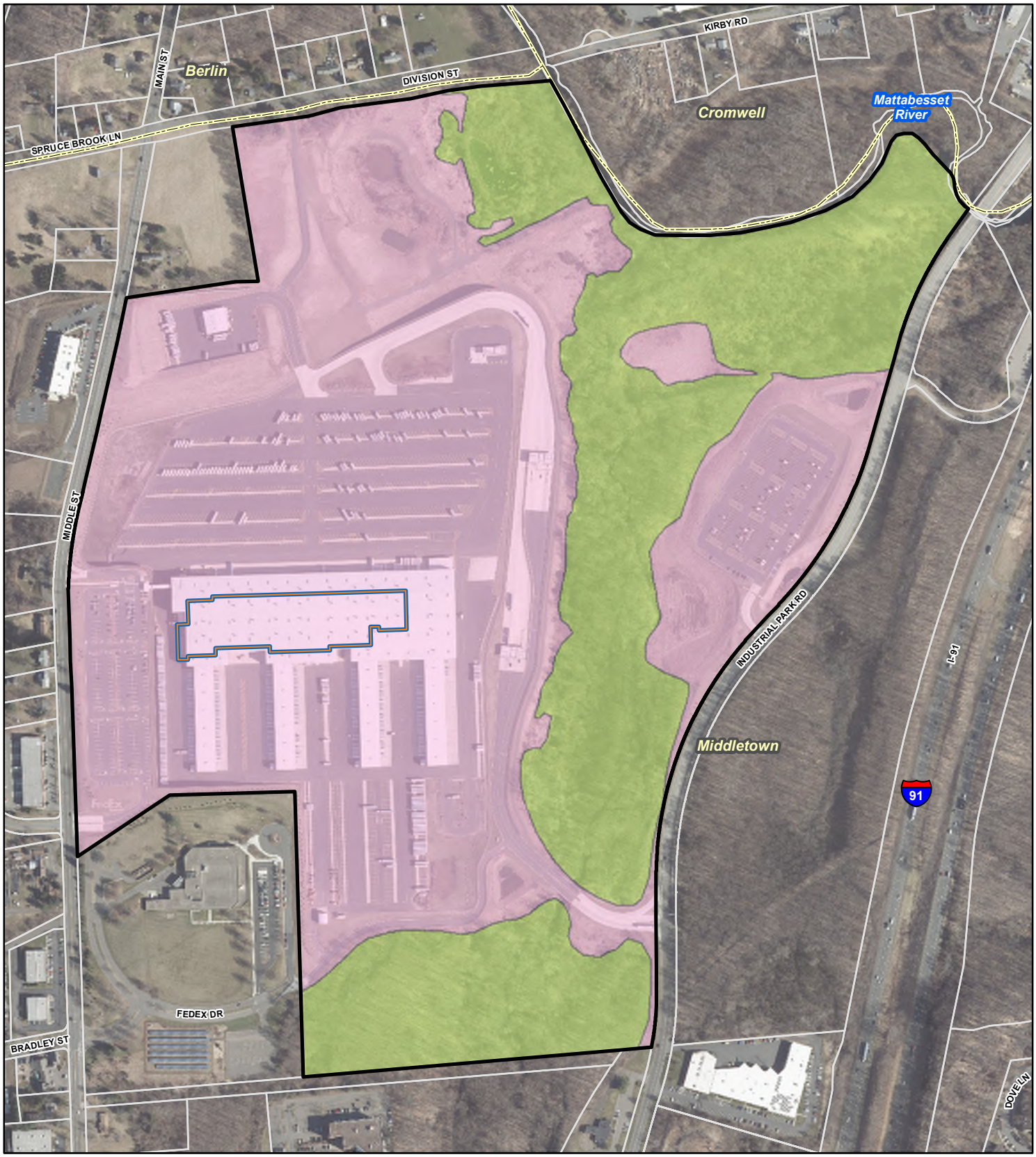
1.5 MW Roof-Mounted Solar Project

Federal Express Distribution Center
49 Fedex Drive, Middletown, Connecticut

500 0 500 Feet

Figure 2A

Data Sources:
**Data layer not located within mapped extent*
Aerial Base Map: State of Connecticut 2019 aerial imagery CTECO
Elevation Contours: 2016 LiDAR data CTECO
Other: CTDEEP's data library (http://www.ct.gov/deep)



Legend

- Site
- Project Area
- Approximate Parcel Boundary

Cover Type

- Developed
- Forested Wetland

Existing Cover Types

November 2022

1.5 MW Roof-Mounted Solar Project

Federal Express Distribution Center
49 Fedex Drive, Middletown, Connecticut

500 0 500 Feet

Figure 2B

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

D. Project Description

The proposed Facility will be located on the rooftop of the existing FedEx Distribution Center. The Facility will consist of 1.5 MW AC PV system that connects behind one of the two existing service meters. There is an existing 1 MW AC fuel cell system by others that is already interconnected behind the other service meter (see CSC Petition #1332).

a. Facility Design

As currently designed, the proposed Project will consist of 3,776 Phono Solar Model PS545M6H-24/TH 545 Watt solar modules; 25 CPS 480V 60kW (SCA60KTL-DO/US-480) inverters; IronRidge XR100 rails and S5 clamps to attach the panels to the rooftop; and electrical systems interconnected to the existing utility services into the Site. SUMEC Energy Holdings Co. Ltd., the parent company of Phono Solar, have performed a Toxicity Characteristic Leaching Procedure ("TCLP") test on its solar modules and they are not characterized as hazardous waste. The existing building has been structurally analyzed and is adequate to accommodate the additional load of the Project without diminishing the snow load capacity. The Facility's panels and inverters have an anticipated service life of thirty-five (35) years. The 1.5 MW AC system will have an expected net AC capacity factor of approximately 16.43%. No fencing or other security measures are required for the Facility on the rooftop.

See Figure 3 (Proposed Conditions Map) for a depiction of the Facility layout. See Appendix A for major system component specifications, the TCLP testing report, and the building's structural evaluation.

ii. Interconnection

The Facility will be interconnected to one of the building's two (2) existing switchgear units, located inside the building's electrical room, that are served by two utility transformers. The existing 2000kVA services transformers and the existing switchgear are adequate to receive the proposed & and existing generation. Therefore existing service equipment will not need to be upgraded or replaced. The Project has submitted to Eversource Energy for interconnection and a distribution impact study is currently in process.

iii. Site Access

The Facility will be accessed via the existing driveway and parking lot for the Project Site; no upgrades are required.

Legend

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

Proposed Conditions

November 2022

1.5 MW Roof-Mounted Solar Project

Federal Express Distribution Center
49 Fedex Drive, Middletown, Connecticut

500 0 500 Feet

Figure 3

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

iv. Construction

Construction for the Facility will consist of the installation of roof mounted racking, modules, conduit and wire on the roof of the building along the exterior and down to the existing switchgear in the existing electrical room located on the west side of the building. Material will be stored on site within the existing paved parking lot of the Project Site, and material will be brought to the roof via cranes and manlifts. There will be a small amount of surface disturbance to an existing paved area adjacent to the building electrical room to perform installation of concrete pad for a piece of equipment.

Construction Phasing:

1. Conduct pre-construction meeting with building facilities manager and all subcontractors.
2. Install roof mounted racking.
3. Install conduit and cable tray.
4. Install modules and wiring.
5. Commission the Facility.

The construction of the Facility is expected to take six (6) months starting in Spring 2023 with completion expected in Fall 2023. Construction activities on the Site will occur between the hours of 7:00am and 5:00pm, Monday through Saturday, and if necessary between the hours of 9:00am and 5:00pm on Sunday.

v. Maintenance

Throughout the operational phase of the Project, periodic inspections and maintenance will be performed as required; required maintenance of the Project, however, is expected to be minimal. The designated Operations & Maintenance ("O&M") service provider and/or its authorized subcontractors, will visit the Site to assess site conditions and perform maintenance as needed. Other anticipated management/maintenance activities for the Project are as follows:

1. Equipment Maintenance: Verogy and/or its authorized subcontractors will inspect and maintain electrical and PV equipment in accordance with the manufacturers' respective requirements to maintain proper operation and warranty status of the equipment. Verogy will also perform the following inspections: (a) the operation of all safety devices will be reviewed and corrected to maintain proper function; (b) full visual inspection of all equipment, including

subassemblies, wiring, and connectors; (c) thermal scanning of electronic equipment, wiring terminations, and connectors; (d) mechanical inspection, including torque verification of critical connections; I string testing (IV curve test); and (f) air filter elements.

2. Module Cleaning: Although module cleaning is rarely necessary in the Northeast, in the event that the solar modules were to experience enough soiling to adversely affect production, the modules will be cleaned using water brought in by tanker truck and soft bristle brooms. No chemicals will be used in connection with any module cleaning.

3. Snow Maintenance/Removal: The Petitioner does not intend to remove snow from the solar modules.

See Appendix B for the Operations and Maintenance Plan.

vi. Decommissioning

At the end of the Project's useful life, the Facility will be fully decommissioned and removed from the Site.

See Appendix C for the Decommissioning Plan.

IV. PROJECT BENEFITS

The Project creates a number of benefits with local, statewide, and regional significance—including supporting renewable energy development and construction related jobs, contributing to Connecticut's statewide renewable energy goals, and reducing the electrical consumption from the utility grid of the existing Site.

Given the Project's size and the average annual load generated by the existing building on Site, this proposed solar Facility, coupled with the existing fuel cell unit, is expected to generate enough on-site energy to reduce the electrical consumption from the utility grid by up to 100%, while generating zero pollution or carbon emissions. The Petitioner also intends to use, where appropriate, local and regional labor for the construction and subsequent operation of the Project and expects that new construction and operation and maintenance jobs will be created. Moreover, there will be no additional burdens placed on municipal infrastructure or demands on City of Middletown services due to the development of the Project.

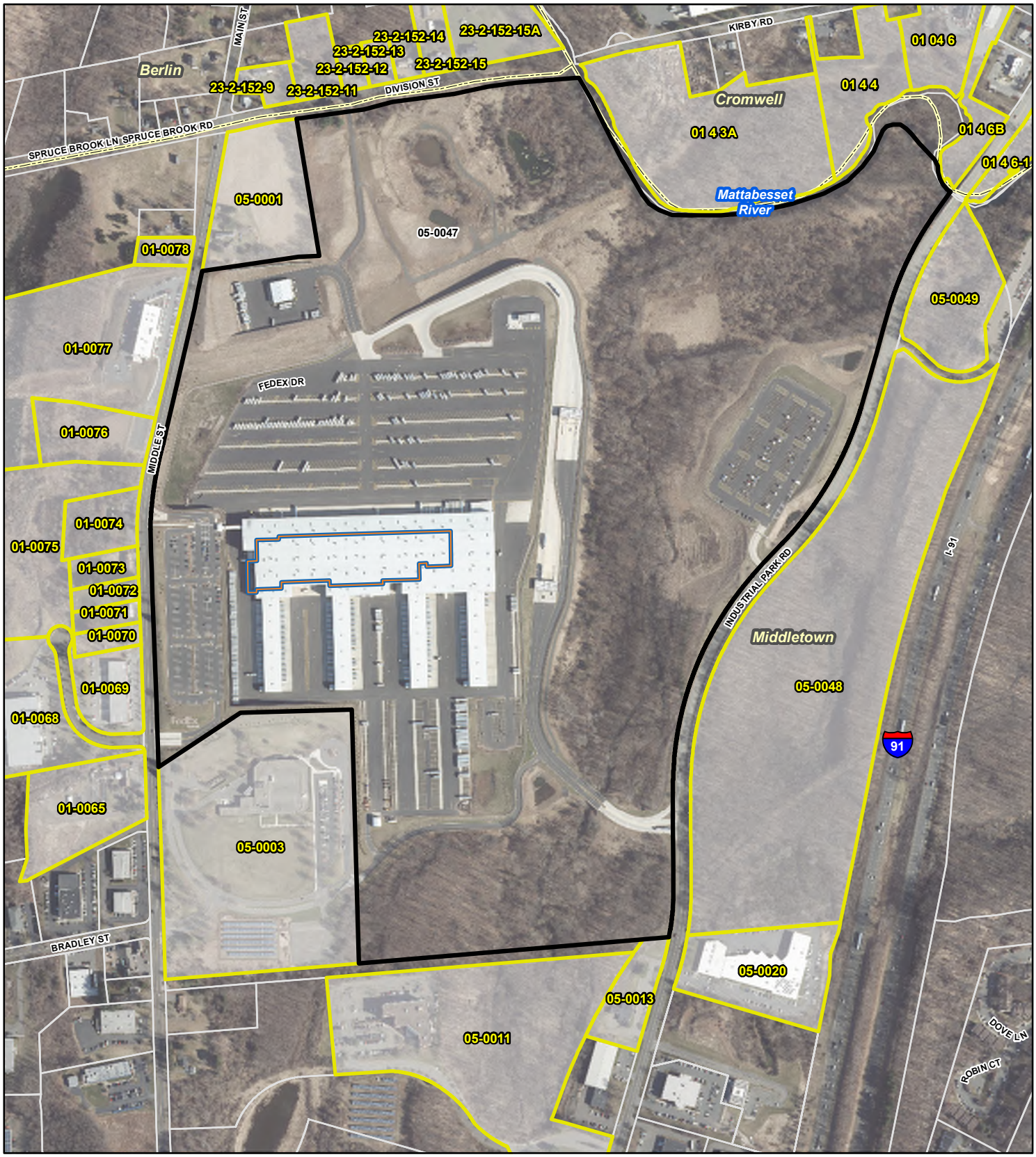
Importantly, the Project will generate the majority of its power during the summer electrical peak, thereby providing peaking resources when the State has its greatest need for energy. *See* CGS § 16-I(c)(1) (a project provides a public benefit if it is deemed "necessary for the reliability of the electric power supply of the state or for a competitive market for electricity"). This reduction in energy demand during peak usage will, in turn, decrease energy costs for ratepayers statewide.

V. LOCAL OUTREACH AND PUBLIC NOTICE

In November of 2022, the Petitioner informed municipal officials in Middletown, Berlin, and Cromwell of its plans to develop the Project. The Petitioner will remain in regular contact with municipal officials keeping them appraised of the Project's progress and the permitting and development schedules. Additionally, in November of 2022, the Petitioner formally notified the abutting property owners and required government agencies.

See Figure 4 (Abutting Parcels Map) for a map of the Site and the identified abutting property owners. See Appendix D for the Abutting Property Owner List and Sample Notice Letter and Appendix E for the List of Municipal Officials and Government Agencies and Sample Notice Letter.

VEROGY



Legend

- Site
- Abutting Parcel
- Project Area
- Approximate Parcel Boundary
- Municipal Boundary (CTDEEP)

Abutting Parcels

November 2022

1.5 MW Roof-Mounted Solar Project

Federal Express Distribution Center
49 Fedex Drive, Middletown, Connecticut

500 0 500 Feet

Figure 4

Data Sources:
Aerial Base Map: State of Connecticut 2019 aerial imagery CTECO
Abutting parcel data obtained from the City of Middletown, Town of Berlin, and Town of Cromwell online GIS system

VI. POTENTIAL ENVIRONMENTAL EFFECTS

As is evidenced by the information provided below, the Project has been designed to avoid or minimize impact(s) to public health and safety, the existing environment, wildlife, and habitat on and around the Site; and, in accordance with CGS § 16-50g, will not have an adverse effect on scenic, historical, or recreational ar.

a. A. Public Health and Safety

As a Class I Renewable Energy Source, the Project represents a clean and safe method of electricity generation in the State. The Project will contribute to reducing greenhouse gas emissions to the extent it displaces the fossil-fueled generating resources, and the Project, once operational, will not create any waste or other emissions that would be detrimental to public health and safety. In addition, the Project will not consume any water or produce any wastewater or otherwise involve the injection of waste or harmful or toxic substances into ground water or wells.

The Project has been designed to meet or exceed all applicable health and safety standards and requirements related to solar photovoltaic electric power generation, including the National Electrical Safety Code ("NESC"), and those codes and standards promulgated by the National Fire Protection Association ("NFPA").[2] Each employee working on the Project will:

- Receive required general and Site-specific health and safety training;
- Comply with all health and safety controls as directed by local and state authorities;
- Understand and employ a Project health and safety plan while on the Site;
- Know the location of local emergency care facilities, travel times, ingress and egress routes; and
- Report all unsafe conditions to the construction manager.

The Petitioner will also coordinate with the City of Middletown police and fire departments regarding access to the Facility and emergency shutoff switches.

2 Collectively, these provisions govern the safe installation and maintenance of electrical systems, including alternations, repairs, replacement(s), equipment, appliances, fixtures, fittings, and appurtenances thereto.

B. Land Use and Development

The Project is consistent with federal, state, and local policies. The State of Connecticut has committed to reducing its reliance on fossil fuels and natural gas to mitigate the effects of climate change. This is evident by the Governor signing Executive Order No. 3, with a goal of achieving a 100% zero carbon target for the electric sector by 2040.[3] This Project, if approved, will help support these ambitious efforts by developing a renewable energy resource that does not have a substantially adverse environmental effect.

The Project is consistent with the goals, policies and implementation strategies contained in the City of Middletown's Plan of Conservation and Development (the "Town's Plan"). The Prologue of the Town's Plan indicates a commitment to the reduction of greenhouse gas emissions & the promotion of renewable energy sources.

C. Wildlife and Cover Type

Provided in the following sections is information regarding: (1) the identified onsite cover types and anticipated Project impacts; (2) core forest; and (3) threatened and endangered species.

i. Cover Types

The Project Site is comprised of two different cover types consisting of Developed and Forested Wetlands and are described in more detail below. The Facility is located entirely within the Developed portion of the Project site. See Figure 2A (Existing Conditions Map) and Figure 2B (Existing Cover Type Map).

a. Project Site Cover Types

Developed

The Project Site consists mainly of an existing industrial development, including a warehouse building, parking lot, stormwater basins, and associated infrastructure. The existing development generally occupies the central & western portions of the parcel and serves as a FedEx Distribution Center for the northeast. A satellite parking area occupies a small portion of the eastern part of the property.

[3] See Governor Ned Lamont Executive Order No. 3, which can be found at https://portal.ct.gov/-/media/Office-of-the-Governor/Executive-Orders/Lamont-Executive-Orders/Executive-Order-No-3.pdf

Forested Wetlands

The remaining undeveloped portion of the Site on the northern and eastern sides of the site consists of a forested wetland associated with the Saw Mill Brook.

b. Potential Habitat Impact(s) and Mitigation

The Facility will be located on the rooftop of the existing building with the solar switchgear located adjacent to the building within the previously developed area. There will be no impacts to the existing undeveloped land.

ii. Core Forest

A review of the CT DEEP's *Forestland Habitat Impact Mapping,*[4] indicates that there are no areas of the Project Site that are mapped as "core forest." See Figure 5 (Forested Habitat Impacts) for the map of the Site and the Project area on the rooftop.

iii. Threatened and Endangered Species

The Project is not proposing to cut any trees and therefor will not have any impacts on the Northern Long Eared Bat.

While there is an NDDB polygon located on the Site, associated with the Saw Mill Brook, the proposed Project does not fall within the NDDB polygon. Additionally, the Project is located on an existing building rooftop and the disturbance is less than 1 acre and thus does not trigger a CT DEEP Stormwater Permit. With no impacts within an NDDB polygon and no state permit required, an NDDB review is not required.

The Project will not have any adverse environmental impacts on threatened and endangered species.

4Source: http://ctdeep.maps.arcgis.com/apps/webappviewer/index.html?id=7b81844bab634281b544c20bf2d7bfb8: This spatial screening layer identifies prime continuous and connected core forestland blocks. It is intended to identify areas of potential forestland habitat impacts relative to solar installation applications made to the Connecticut Siting Council. If the project intersects with the Forestland Habitat Impact Map there is a potential for material effects to core forest.

Legend

- Site
- Project Area
- Approximate Parcel Boundary
- Forestland Habitat Impact (CTDEEP)

Forested Habitat Impacts

November 2022

1.5 MW Roof-Mounted Solar Project

Federal Express Distribution Center
49 Fedex Drive, Middletown, Connecticut

500 0 500 Feet

Figure 5

Data Sources:
**Data layer not located within mapped extent*
Aerial Base Map: State of Connecticut 2019 aerial imagery CTECO

D. Wetlands

The site is bordered on the northeast side by the Mattabesset River and the Sawmill Brook runs north-south through the eastern portion of the Site. This wetland system will not be impacted by the Project as all of the work is located within the disturbed area of the Site and no excavation or disturbance of any ground is proposed for this installation.

E. Water Resources and Stormwater Management

The Project is not expected to have an adverse impact on the State's water resources, as the Facility will be unstaffed, no potable water uses or sanitary discharges are planned, and no liquid fuels are associated with the operation of the Facility. Therefore, the Project satisfies the water quality standards of CT DEEP.

i. Floodplain Areas

Petitioner reviewed the United States Federal Emergency Management Agency ("FEMA") Flood Insurance Rate Maps ("FIRM") for the Site. The Site is mapped on FIRM PANEL #09007C0101G & #09007C0102G, dated August 28, 2008. Based upon the reviewed mapping, there are areas on the eastern portion of the Site, associated with the Saw Mill Brook, are classified as "Zone AE", typically referred to as the 100-year floodplain and include some adjacent areas of 500-year floodplain. These areas are located within the undeveloped area of the site. The remainder of the Site and where the Facility will be located are classified as "Zone X" areas outside the 500-year floodplain. This Project will have no adverse effect on floodplain areas. See Figure 2A (Existing Conditions Map).

ii. Groundwater

Groundwater underlying the Site is classified by CT DEEP as "GA". The "GA" classification designates that uses are existing private and potential public or private supplies of water suitable for drinking without treatment. The Site is not located in a mapped Aquifer Protection Area. Thus, the Project will have no adverse effect on ground water quality.

iii. Surface Water

The Project will have no adverse effect on the Site's surface water quality as the Project is located entirely within existing disturbed areas and is over 300 feet from the existing Sawmill Brook. There is no public drinking water supply watershed located on the Site.

iv. Stormwater Management

The Site has existing stormwater management systems on premises. No additional stormwater management is required for this Project as it is located within an existing disturbed area. The Project will also will not disturb any ground surfaces and is therefore not required to file for a *General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities*.[5]

F. Soils and Geology

The Project is located within an existing developed area of the Site and on the rooftop of an existing building, and any soils that are excavated for the utility connection within the existing parking area have been previously disturbed by previous construction. The Site does have mapped Prime and Statewide Important Farmland Soils according to CT DEEP GIS but those areas are outside the Projects area of ground disturbance. Since the Project is less than 2.0 MW AC the Petitioner is not required to have correspondence with the Connecticut Department of Agriculture.

G. Historic and Archaeological Resources

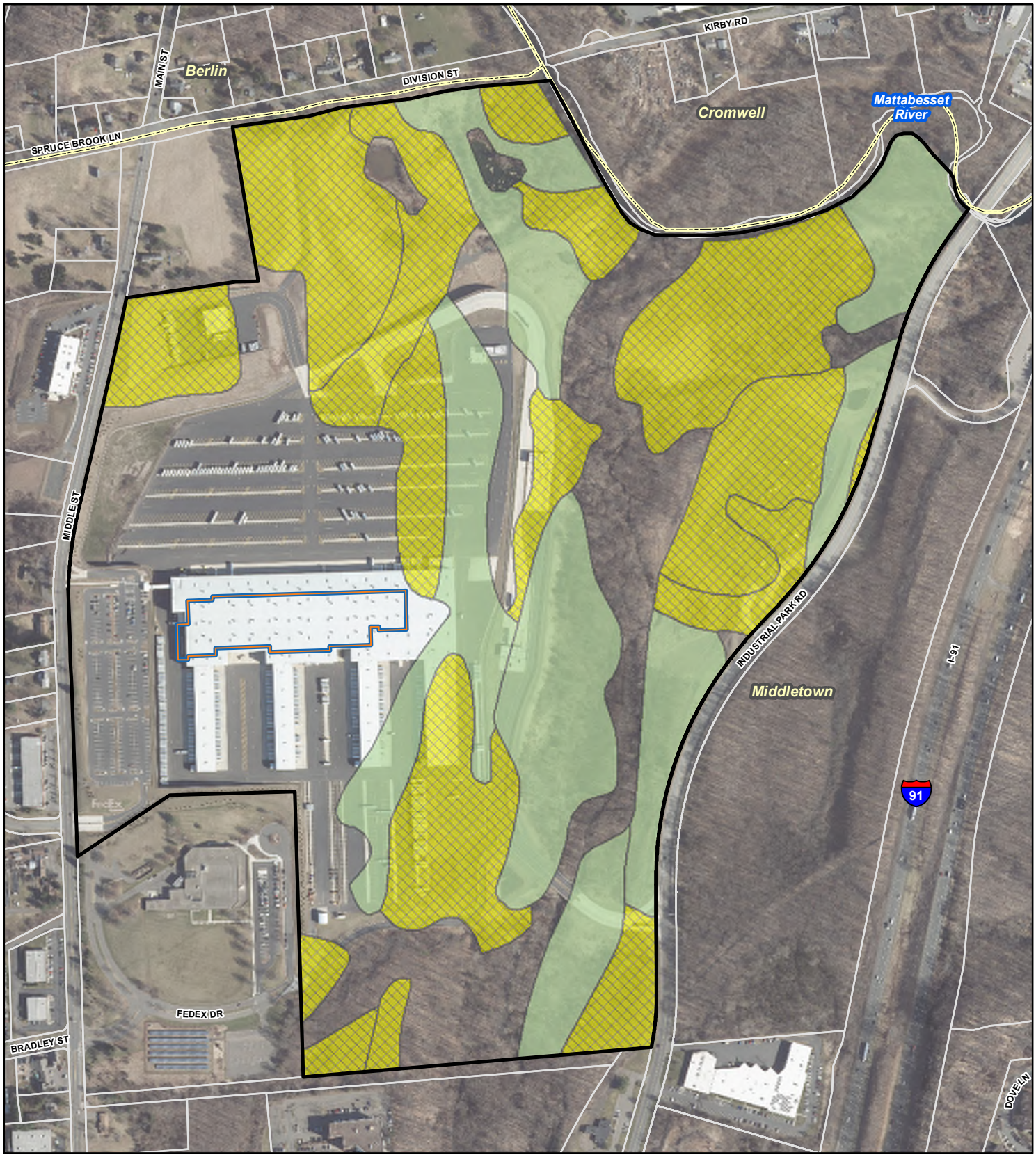
The Project is located within existing disturbed areas and will have no impacts on historic or archaeological resources.

H. Air Quality

Overall, the Project will have minor emissions of regulated air pollutants during construction; however, no air permit is required for these activities. During construction of the Project, any air emission effects will be temporary and will be controlled by enacting appropriate mitigation measures (e.g., water for dust control, avoiding mass early morning vehicle startups, etc.). Accordingly, any potential effects on air quality as a result of the Project construction activities will be minimized.

During operation, the Project will not produce air emissions of any regulated air pollutants or greenhouse gases (e.g., PM10, PM2.5, VOCs, GHG or Ozone). Therefore, no adverse effect on air quality is anticipated and no air permit will be required.

[5] See Section 3(a) Eligible Activities; https://portal.ct.gov/-/media/DEEP/Permits_and_Licenses/Water_Discharge_General_Permits/stormconstgp1.pdf



Legend

- Site
- Project Area
- Approximate Parcel Boundary

Farmland Soils (CTDEEP)

- Prime Farmland Soils
- Statewide Important Farmland Soils

Farmland Soils

November 2022

1.5 MW Roof-Mounted Solar Project

Federal Express Distribution Center
49 Fedex Drive, Middletown, Connecticut

500 0 500 Feet

Figure 6

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

I. Noise

As abovementioned, the Project is located in the City of Middletown's IT Industrial Zone, with Residential Zones located to the west of the property. Pursuant to the Town of Middletown Noise Ordinance, an emitter in an industrial zone with a residential zone receptor cannot exceed, at the boundaries of a parcel, the noise level(s) of 51 dBA during the nighttime hours and 61 dBA during the daytime hours. Day is defined as the hours between 7:00 a.m. and sundown.

The Facility will have limited noise-producing equipment onsite, consisting of the inverters and transformers. The loudest piece of equipment onsite will be the inverters; per the manufacturer's specifications, this equipment will generate a maximum sound level of 60 dBA at 3 feet away. The inverters only operate during daytime hours and are less than the 61 dBA allowable per the noise ordinance.

During the short-term construction period, the Petitioner expects that some typical construction equipment noise will occur. However, such noise will be minimal and will be limited to daytime construction hours and will not exceed the 61 dBA threshold.

J. Lighting

No exterior lighting is planned for the Facility. There is currently lighting on Site associated with the existing development that will remain.

K. FAA Determination

The Project was reviewed using the Federal Aviation Administration (the "FAA") Notice Criteria Tool to determine if the Project needed to file with the FAA under the provisions of 49 U.S.C., Section 44718 and Title 14 of the Code of Federal Regulations, part 77. The Project was not required to file with the FAA because it did not exceed the notice criteria. See Appendix F for the FAA's determination on the Project.

L. Scenic and Recreational Areas

There are three scenic and recreational areas within the vicinity of the Project. Alice Fern Bruce Preserve is located to the west, Cucia Park is located to the south, and the Mattabesset Multi-Use Trail is located to the east on the other side of Interstate 91. The Facility will be located on the rooftop of the existing building and there will be no changes to the visibility to the surrounding areas as a result of this Project.

M. Visibility Evaluation

The Facility will be located on the rooftop of the existing building on Site and accordingly the Petitioner does not anticipate any adverse visual impacts will result from the development of the Project.

VII. CONCLUSION

As demonstrated by the foregoing, Petitioner's proposed Project will result in no air emissions, has no potential effects on natural resource(s), and complies with the applicable air and water quality standards of CT DEEP. Pursuant to CGS §16-50k(a), the Siting Council shall approve by declaratory ruling the construction or location of a grid-side distributed resources project or facility with a capacity of not more than 65 MW, as long as such project meets CT DEEP air and water quality standards and will not have a substantial adverse environmental effect. As amply demonstrated in this Petition, the Project satisfies these criteria.

The Petitioner, therefore, respectfully requests that the Siting Council issue a declaratory ruling that the proposed Project will comply with CT DEEP air and water quality standards, will not have a substantial adverse environmental effect, and does not require the issuance of a Certificate by the Siting Council.

Respectfully Submitted,

VCP FX CT, LLC

By_____

Bradley J. Parsons
Director of Design and Permitting
Verogy
150 Trumbull Street, 4th Floor
Hartford, CT 06103
(P) 860.288.7215,x715
(E) bparsons@verogy.com
The Petitioner

Appendix A – Equipment Specifications, TCLP Report, Building Structural Evaluation

Phono® Solar

TWINPLUS MODULE SERIES

HIGH EFFICIENCY MONO-PERC M6-10B-R

535-555W

OUTSTANDING PRODUCT PERFORMANCE

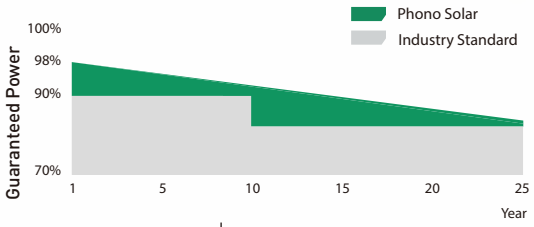
- Competitive high-temperature performance with ameliorated temperature coefficient
- Minimized power loss in cell connection
- Better performance under shading effect
- Decreased nominal operating cell temperature to 45 ± 2°C
- Higher power generation with multi-busbar and half-cut technology

TRUSTWORTHY QUALITY AND RELIABILITY

- Guaranteed 0~+5W positive tolerance secures reliable power output
- 5400Pa maximum snow load, 2400Pa maximum wind load
- Optimized electrical design lowers hot spot risk and operating current

PID RESISTANT

- Industry-leading cell processing technology and electrical design ensure solid PID resistance



12-year Product Warranty | **25-year** Linear Performance Warranty

MANAGEMENT SYSTEM CERTIFICATES

IEC 61215, IEC 61730
ISO 9001:2015 / Quality management system
ISO 14001:2015 / Standards for environmental management system
ISO 45001:2018 / International standards for occupational health & safety

Bloomberg NEW ENERGY FINANCE Tier 1

TOP PERFORMER 2022 PVEL PV MODULE RELIABILITY SCORECARD

www.phonosolar.com info@phonosolar.com

ELECTRICAL TYPICAL VALUES

Model	1000V	PS535M6-24/TH		PS540M6-24/TH		PS545M6-24/TH		PS550M6-24/TH		PS555M6-24/TH	
	1500V	PS535M6H-24/TH		PS540M6H-24/TH		PS545M6H-24/TH		PPS550M6H-24/TH		PS555M6H-24/TH	
Testing Condition		STC	NOCT	STC	NOCT	STC	NOCT	STC	NOCT	STC	NOCT
Rated Power (Pmpp)		535	398	540	402	545	405	550	409	555	413
Rated Current (Impp)		12.97	10.48	13.06	10.55	13.15	10.63	13.24	10.70	13.33	10.77
Rated Voltage (Vmpp)		41.25	37.98	41.35	38.07	41.45	38.16	41.55	38.25	41.64	38.34
Short Circuit Current (Isc)		13.52	10.92	13.62	11.00	13.72	11.09	13.82	11.17	13.92	11.25
Open Circuit Voltage (Voc)		49.29	46.53	49.39	46.62	49.49	46.72	49.59	46.81	49.69	46.91
Module Efficiency (%)		20.71		20.90		21.10		21.29		21.48	

STC(Standard Testing Conditions):Irradiance 1000W/m², AM 1.5, Cell Temperature 25'C

NOCT (Nominal Operation Cell Temperature): Irradiance 800W/m², Ambient Temperature 20'C, Spectra at AM1.5, Wind at 1m/S

MECHANICAL CHARACTERISTICS

Cell Type	Monocrystalline 182mm x 91mm
Dimension (L× W × H)	Length: 2278mm (89.69 inch) Width: 1134mm （44.65 inch） Height: 35mm (1.38 inch)
Weight	29.0kg (63.93 lbs)
Front Glass	3.2mm Toughened Glass
Frame	Anodized Aluminium Alloy
Cable (Including Connector)	4mm² (IEC), (+):450mm,(-):250mm or Customized Length
Junction Box	IP 68 Rated

TEMPERATURE RATINGS

Voltage Temperature Coefficient	-0.28%/'C
Current Temperature Coefficient	+0.05%/'C
Power Temperature Coefficient	-0.35%/'C
Tolerance	0~+5w
NOCT	45±2'C

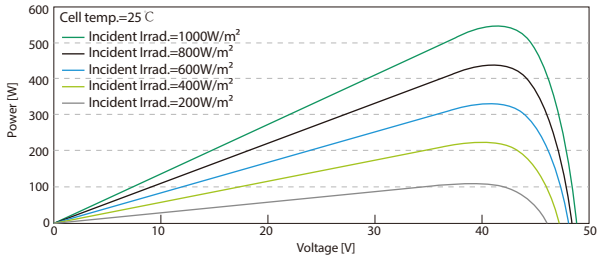
ABSOLUTE MAXIMUM RATING

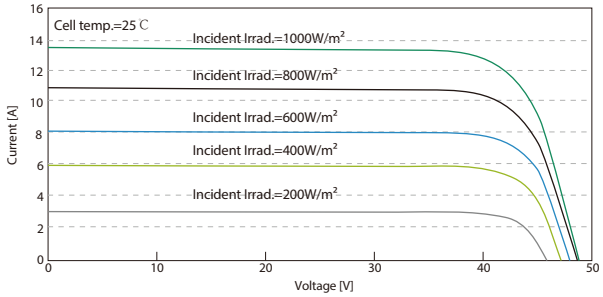
Operating Temperature	From -40 to +85'C
Hail Diameter @ 80km/h	Up to 25mm
Front Side Maximum Static Loading	5400Pa
Rear Side Maximum Static Loading	2400Pa
Maximum Series Fuse Rating	25A
PV Module Classification	II
Module Fire Performance (UL 61730)	Type 4
Maximum System Voltage	DC 1000V/1500V

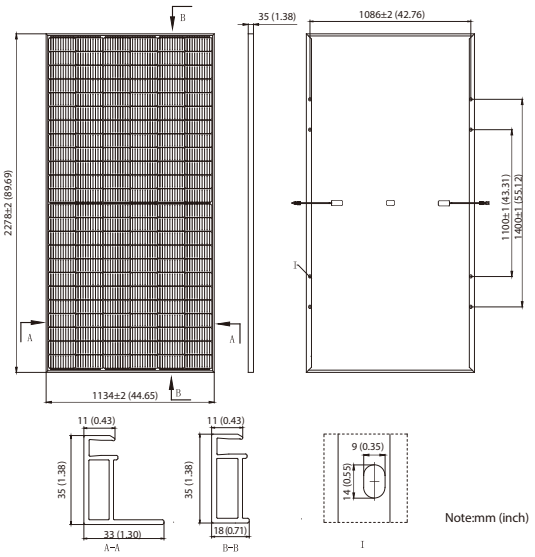
PACKING CONFIGURATION

Container	20' GP	40' HQ
Pieces/Container	155	620

ELECTRICAL CHARACTERISTICS





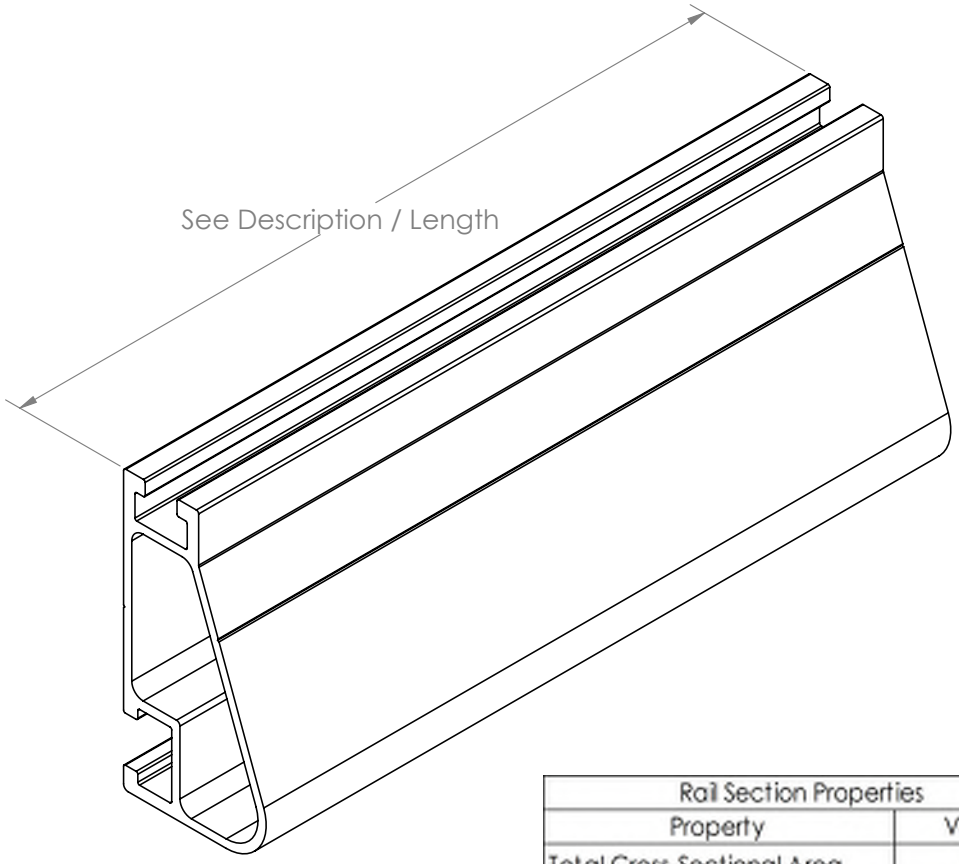


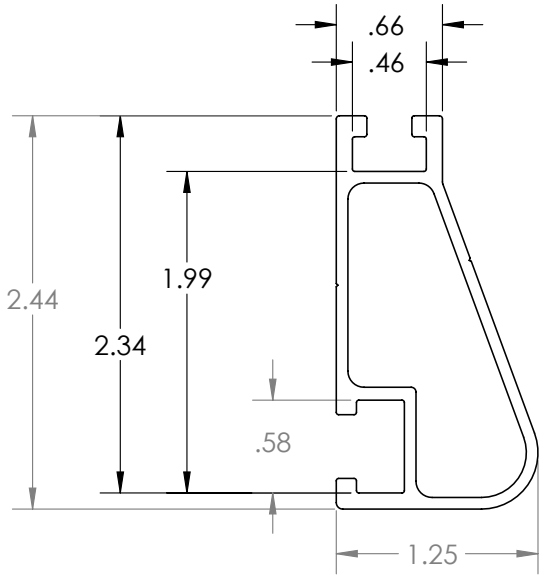
Phono® Solar

PHONO SOLAR TECHNOLOGY CO.,LTD reserves the right to make necessary adjustments to the information described herein at any time without further notice. The specifications and certificates contained in this datasheet may deviate slightly from our actual products due to the on-going innovation and product enhancement. Please be sure to use the most recent version of data.

IRONRIDGE

XR100® Rail





Rail Section Properties	
Property	Value
Total Cross-Sectional Area	0.582 in^2
Section Modulus (X-axis)	0.297 in^3
Moment of Inertia (X-axis)	0.390 in^4
Moment of Inertia (Y-axis)	0.085 in^4
Torsional Constant	0.214 in^3
Polar Moment of Inertia	0.126 in^4

APPROVED MATERIALS:
6005-T6, 6005A-T61, 6105-T5, 6N01-T6
(34,000 PSI YIELD STRENGTH MINIMUM)

Clear Part Number	Black Part Number	Description / Length	Material	Weight
XR-100-132A	XR-100-132B	XR100, Rail 132" (11 Feet)	6000-Series Aluminum	7.50 lbs.
XR-100-168A	XR-100-168B	XR100, Rail 168" (14 Feet)		9.55 lbs.
XR-100-204A	XR-100-204B	XR100, Rail 204" (17 Feet)		11.60 lbs.

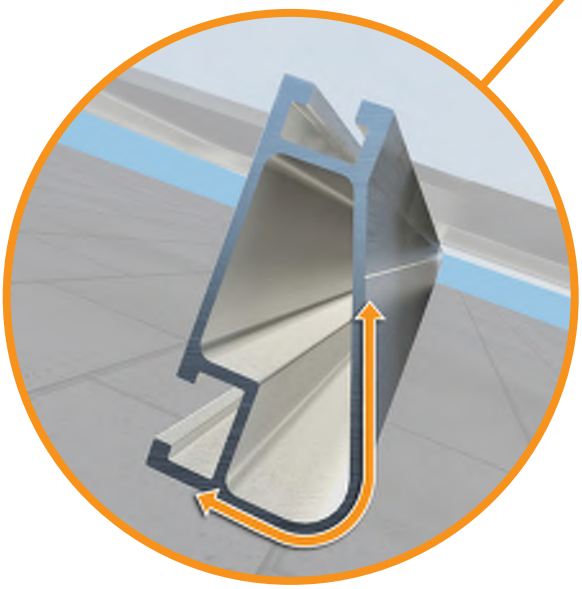
IRONRIDGE

XR Rail© Family

Solar Is Not Always Sunny

Over their lifetime, solar panels experience countless extreme weather events. Not just the worst storms in years, but the worst storms in 40 years. High winds capable of ripping panels from a roof, and snowfalls weighing enough to buckle a panel frame.

XR Rails© are the structural backbone preventing these results. They resist uplift, protect against buckling and safely and efficiently transfer loads into the building structure. Their superior spanning capability requires fewer roof attachments, reducing the number of roof penetrations and the amount of installation time.



Force-Stabilizing Curve

Sloped roofs generate both vertical and lateral forces on mounting rails which can cause them to bend and twist. The curved shape of XR Rails© is specially designed to increase strength in both directions while resisting the twisting. This unique feature ensures greater security during extreme weather and a longer system lifetime.

Compatible with Flat & Pitched Roofs

XR Rails© are compatible with FlashFoot© and other pitched roof attachments.

IronRidge© offers a range of tilt leg options for flat roof mounting applications.

Corrosion-Resistant Materials

All XR Rails© are made of 6000-series aluminum alloy, then protected with an anodized finish. Anodizing prevents surface and structural corrosion, while also providing a more attractive appearance.

XR Rail© Family

The XR Rail© Family offers the strength of a curved rail in three targeted sizes. Each size supports specific design loads, while minimizing material costs. Depending on your location, there is an XR Rail© to match.

XR10

XR10 is a sleek, low-profile mounting rail, designed for regions with light or no snow. It achieves spans up to 6 feet, while remaining light and economical.

- 6' spanning capability
- Moderate load capability
- Clear & black anodized finish
- Internal splices available

XR100

XR100 is the ultimate residential mounting rail. It supports a range of wind and snow conditions, while also maximizing spans up to 10 feet.

- 10' spanning capability
- Heavy load capability
- Clear & black anodized finish
- Internal splices available

XR1000

XR1000 is a heavyweight among solar mounting rails. It's built to handle extreme climates and spans up to 12 feet for commercial applications.

- 12' spanning capability
- Extreme load capability
- Clear anodized finish
- Internal splices available

Rail Selection

The table below was prepared in compliance with applicable engineering codes and standards.* Values are based on the following criteria: ASCE 7-16, Gable Roof Flush Mount, Roof Zones 1 & 2e, Exposure B, Roof Slope of 8 to 20 degrees and Mean Building Height of 30 ft. Visit IronRidge.com for detailed certification letters.

Load		Rail Span					
Snow (PSF)	Wind (MPH)	4'	5' 4"	6'	8'	10'	12'
None	90	XR10		XR100		XR1000	
	120						
	140						
	160						
20	90						
	120						
	140						
	160						
30	90						
	160						
40	90						
	160						
80	160						
120	160						

*Table is meant to be a simplified span chart for conveying general rail capabilities. Use approved certification letters for actual design guidance.

S-5!®

The Right Way!®

S-5-E Clamp

The S-5-E clamp is designed specially for double-folded standing seam roof profiles having the appropriate dimensioning.

Although a bit smaller and less expensive than the S-5-U, for these profiles, the S-5-E is just as strong.

The S-5-E is perfect for use with S-5!® ColorGard® snow retention systems and other heavy-duty applications.

Installation is as simple as placing the clamp on the seam and tightening the patented round-point setscrews to the specified tension. Then, affix ancillary items using the bolt provided. Go to www.S-5.com/tools for information and tools available for properly attaching and tensioning S-5! clamps.

S-5-E Mini Clamp

The S-5-E Mini is a bit shorter than the S-5-E and has one setscrew rather than two. The mini is the choice for attaching all kinds of rooftop accessories: signs, walkways, satellite dishes, antennas, rooftop lighting, lightning protection systems, solar arrays, exhaust stack bracing, conduit, condensate lines, mechanical equipment—just about anything!*

*S-5! mini clamps are not compatible with, and should not be used with S-5! SnoRail™/SnoFence™ or ColorGard® snow retention systems.

The S-5-E clamp is secured with our patented round-point setscrews without piercing the metal roof panel, thereby preserving the roof manufacturer's warranty!

The right way to attach almost anything to metal roofs!

S-5-E and S-5-E Mini

888-825-3432 | www.S-5.com | MADE IN USA

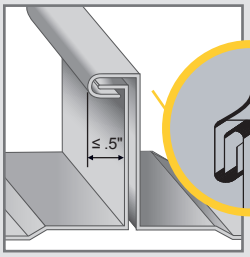
S-5!®
The Right Way!®

The strength of the S-5-E clamp is in its simple design. The patented setscrews will slightly dimple the metal seam material but will not puncture it—leaving roof warranties intact.

The **S-5-E and S-5-E Mini clamps** are each furnished with the hardware shown to the right. Each box also includes a bit tip for tightening setscrews using an electric screw gun. A structural aluminum attachment clamp, the S-5-E is compatible with most common metal roofing materials excluding copper. All included hardware is stainless steel. Please visit **www.S-5.com** for more information including CAD details, metallurgical compatibilities and specifications.

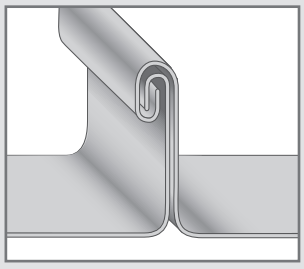
The S-5-E and S-5-E Mini clamps have been tested for load-to-failure results on a variety of double-folded standing seam roofs, from leading manufacturers of panels and panel-forming machines. The independent lab test reports found on our website at www.S-5.com prove that S-5!® holding strength is unmatched in the industry.

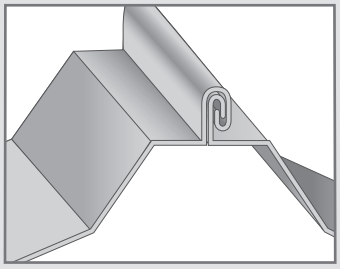
Example Profiles



For horizontal seams under .5", crimp the seam to 180 degrees at desired clamp location.

This illustration demonstrates crimping technique, NOT actual location of clamp.



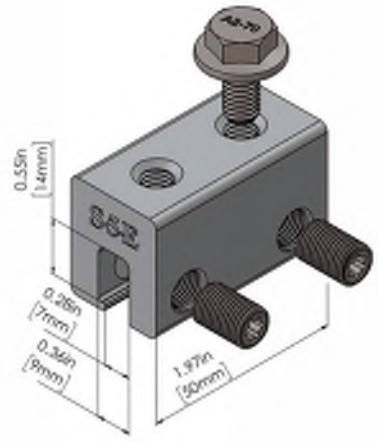


S-5-E Clamp

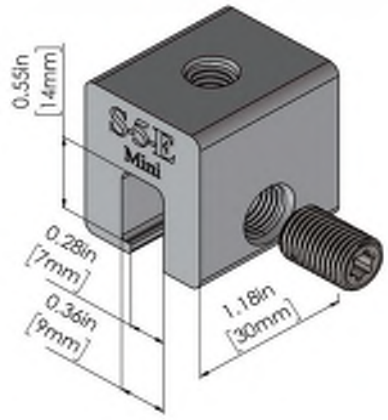
M8-1.25 X 16 mm Hex Flange Bolt

(2x) M8-1.25 Threaded Hole

Two 3/8-24 X 0.80" Round-Point Setscrews



S-5-E Mini Clamp



S-5!® Warning! Please use this product responsibly!

Products are protected by multiple U.S. and foreign patents. Visit the website at www.S-5.com for complete information on patents and trademarks. For maximum holding strength, setscrews should be tensioned and re-tensioned as the seam material compresses. Clamp setscrew tension should be verified using a calibrated torque wrench between 160 and 180 inch pounds when used on 22ga steel, and between 130 and 150 inch pounds for all other metals and thinner gauges of steel. Consult the S-5! website at www.S-5.com for published data regarding holding strength.

Distributed by

50/60kW, 1000Vdc String Inverters for North America

The 50 & 60kW (55 & 66kVA) medium power CPS three phase string inverters are designed for ground mount, large rooftop and carport applications. The units are high performance, advanced and reliable inverters designed specifically for the North American environment and grid. High efficiency at 98.8% peak and 98.5% CEC, wide operating voltages, broad temperature ranges and a NEMA Type 4X enclosure enable this inverter platform to operate at high performance across many applications. The CPS 50/60KTL products ship with either the Standard wire-box or the Rapid Shutdown wire-box, each fully integrated and separable with touch safe fusing, monitoring, and AC and DC disconnect switches. The integrated PLC transmitter in the Rapid Shutdown wire-box enables PVRSS certified module-level rapid shutdown when used with the Tigo TS4-F/TS4-A-F/TS4-A-2F products and APS RSD-S-PLC/RSD-D products. The CPS FlexOM Gateway enables monitoring, controls and remote product upgrades.

CPS SCA50KTL-DO/US-480
CPS SCA60KTL-DO/US-480

Key Features

- NEC 2017/2020 PVRSS Certified Rapid Shutdown
- 55 & 66kVA rating allows max rated Active Power @±0.91PF
- Selectable Max AC Apparent Power of 50/55kVA and 60/66kVA
- NEC 2014/17 compliant & UL listed Arc-Fault circuit protection
- 15-90° Mounting orientation for low profile roof installs
- Optional FlexOM Gateway enables remote FW upgrades
- Integrated AC & DC disconnect switches
- 3 MPPT's with 5 inputs each for maximum flexibility
- NEMA Type 4X outdoor rated, tough tested enclosure
- UL1741 SA Certified to CA Rule 21, including SA8 through SA18
- Separable wire-box design for fast service
- Standard 10 year warranty with extensions to 20 years

50/60KTL Standard Wire-box

50/60KTL Rapid Shutdown Wire-box

Chint Power Systems America
6800 Koll Center Parkway, Suite 235 Pleasanton, CA 94566
Tel: 855-584-7168 Mail: AmericaSales@chintpower.com Web: www.chintpowersystems.com

Model Name	CPS SCA50KTL-DO/US-480	CPS SCA60KTL-DO/US-480
DC Input		
Max. PV Power	90kW (33kW per MPPT)	
Max. DC Input Voltage	1000Vdc	
Operating DC Input Voltage Range	200-950Vdc	
Start-up DC Input Voltage / Power	330V / 80W	
Number of MPP Trackers	3	
MPPT Voltage Range @ PF>0.99	480-850Vdc	540-850Vdc
Max. PV Short-Circuit Current (Isc x 1.25)	204A (68A per MPPT)	
Number of DC Inputs	15 inputs, 5 per MPPT	
DC Disconnection Type	Load-rated DC switch	
DC Surge Protection	Type II MOV, 2800V_C, 20kA I_{TM} (8/20µS)	
AC Output		
Rated AC Output Power @ PF>0.99 to ±0.91[1]	50kW	60kW
Max. AC Apparent Power (Selectable)	50/55kVA	60/66kVA
Rated Output Voltage	480Vac	
Output Voltage Range[2]	422 - 528Vac	
Grid Connection Type	3Φ / PE / N (Neutral optional)	
Max. AC Output Current @480Vac	60.2/66.2A	72.2/79.4A
Rated Output Frequency	60Hz	
Output Frequency Range[2]	57 - 63Hz	
Power Factor	>0.99 (±0.8 adjustable)	
Current THD @ Rated Load	<3%	
Max. Fault Current Contribution (1 Cycle RMS)	64.1A (1.06/0.88 PU)	
Max. OCPD Rating	110A	125A
AC Disconnection Type	Load-break rated AC switch	
AC Surge Protection	Type II MOV, 1240V_C, 15kA I_{TM} (8/20µS)	
System and Performance		
Topology	Transformerless	
Max. Efficiency	98.8%	
CEC Efficiency	98.5%	
Stand-by / Night Consumption	<1W	
Environment		
Enclosure Protection Degree	NEMA Type 4X	
Cooling Method	Variable speed cooling fans	
Operating Temperature Range[3]	-22°F to +140°F / - 30°C to +60°C	
Non-Operating Temperature Range[4]	No low temp minimum to +158°F / +70°C maximum	
Operating Humidity	0 to 100%	
Operating Altitude	13,123.4ft / 4000m (derating from 9842.5ft / 3000m)	
Audible Noise	<60dBA @ 1m and 25°C	
Display and Communication		
User Interface and Display	LCD+LED	
Inverter Monitoring	SunSpec, Modbus RS485	
Site Level Monitoring	CPS FlexOM Gateway (1 per 32 inverters)	
Modbus Data Mapping	CPS	
Remote Diagnostics / FW Upgrade Functions	Standard / (with FlexOM Gateway)	
Mechanical		
Dimensions (HxWxD)	39.4 x 23.6 x 10.24in. (1000 x 600 x 260mm)	
Weight	Inverter: 123.5lbs/56kg; Wire-box: 33lbs/15kg	
Mounting / Installation Angle[5]	15 to 90 degrees from horizontal (vertical or angled)	
AC Termination	M8 Stud Type Terminal Block (Wire range: #6 - 3/0AWG CU/AL , Lugs not supplied)	
DC Termination[6]	Screw Clamp, Neg. Busbar (RSD version[6]) Wire range: #14 - #6AWG CU	
Fused String Inputs (5 per MPPT)[7]	RSD[6] and Standard Wire-box: 20A fuses provided (Fuse values up to 30A acceptable)	
Safety		
Certifications and Standards	UL1741-SA Ed. 2, UL1699B, CSA-C22.2 NO.107.1-01, IEEE1547a-2014; FCC PART15	
Selectable Grid Standard	IEEE 1547a-2014, CA Rule 21, ISO-NE	
Smart-Grid Features	Volt-RideThru, Freq-RideThru, Ramp-Rate, Specified-PF, Volt-VAr, Freq-Watt, Volt-Watt	
Warranty		
Standard	10 years	
Extended Terms	15 and 20 years	

1) Active Power Derating begins; at PF=±0.91 to ±0.8 when Max AC Apparent Power is set to 55 or 66kVA.
2) The "Output Voltage Range" and "Output Frequency Range" may differ according to the specific grid standard.
3) Active Power Derating begins; at 40°C when PF=±0.9 and MPPT ≥Vmin, at 45°C when PF=1 and MPPT ≥Vmin, and at 50°C when PF=1 and MPPT V ≥ 700Vdc.
4) See user manual for further requirements regarding non-operating conditions.
5) Shade Cover accessory required for installation angles of 75 degrees or less.
6) RSD wire-box only includes fuses/fuseholders on the positive polarity, compliant with NEC 2017, 690.9 (C).
7) Fuse values above 20A have additional spacing requirements or require the use of the Y-Comb Terminal Block. See user manual for details.

eurofins | Environment Testing TestAmerica

ANALYTICAL REPORT

Eurofins TestAmerica, Canton
4101 Shuffel Street NW
North Canton, OH 44720
Tel: (330)497-9396

Laboratory Job ID: 240-122464-1
Client Project/Site: Solar Module TCLP

For:
SUMEC Energy Holdings Co. Ltd.
No.1 Xinghuo Road
Nanjing Hi-tesh Zone
Nanjing, China 210061

Attn: Mr. Chester Chen

Authorized for release by:
12/3/2019 7:25:49 PM

Michael DelMonico, Project Manager I
(330)497-9396
michael.delmonico@testamericainc.com

Table of Contents

Definitions/Glossary

Client: SUMEC Energy Holdings Co. Ltd.
Job ID: 240-122464-1
Project/Site: Solar Module TCLP

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
PQL	Practical Quantitation Limit
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)

Job ID: 240-122464-1

Laboratory: Eurofins TestAmerica, Canton

Narrative

CASE NARRATIVE

Client: SUMEC Energy Holdings Co. Ltd.

Project: Solar Module TCLP

Report Number: 240-122464-1

With the exceptions noted as flags or footnotes, standard analytical protocols were followed in the analysis of the samples and no problems were encountered or anomalies observed. In addition all laboratory quality control samples were within established control limits, with any exceptions noted below. Each sample was analyzed to achieve the lowest possible reporting limit within the constraints of the method. In some cases, due to interference or analytes present at high concentrations, samples were diluted. For diluted samples, the reporting limits are adjusted relative to the dilution required.

Eurofins TestAmerica, Canton attests to the validity of the laboratory data generated by Eurofins TestAmerica facilities reported herein. All analyses performed by Eurofins TestAmerica facilities were done using established laboratory SOPs that incorporate QA/QC procedures described in the application methods. Eurofins TestAmerica's operations groups have reviewed the data for compliance with the laboratory QA/QC plan, and data have been found to be compliant with laboratory protocols unless otherwise noted below.

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory.

Calculations are performed before rounding to avoid round-off errors in calculated results.

All holding times were met and proper preservation noted for the methods performed on these samples, unless otherwise detailed in the individual sections below.

All solid sample results are reported on an "as received" basis unless otherwise indicated by the presence of a % solids value in the method header.

This laboratory report is confidential and is intended for the sole use of Eurofins TestAmerica and its client.

RECEIPT

The sample was received on 11/18/2019 11:10 AM; the sample arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 13.8º C.

TCLP METALS (ICP)

Sample SOLAR PANEL (240-122464-1) was analyzed for TCLP metals (ICP) in accordance with EPA SW-846 Methods 1311/6010B. The sample was leached on 11/25/2019, prepared on 11/26/2019 and analyzed on 11/27/2019.

No analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.

TCLP MERCURY

Sample SOLAR PANEL (240-122464-1) was analyzed for TCLP mercury in accordance with EPA SW-846 Methods 1311/7470A. The sample was leached on 11/25/2019, prepared on 11/26/2019 and analyzed on 11/27/2019.

No analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.

Method Summary

Client: SUMEC Energy Holdings Co. Ltd.
Project/Site: Solar Module TCLP

Job ID: 240-122464-1

Method	Method Description	Protocol	Laboratory
6010B	Metals (ICP)	SW846	TAL CAN
7470A	Mercury (CVAA)	SW846	TAL CAN
1311	TCLP Extraction	SW846	TAL CAN
3010A	Preparation, Total Metals	SW846	TAL CAN
7470A	Preparation, Mercury	SW846	TAL CAN
Part Size Red	Particle Size Reduction Preparation	None	TAL CAN

Protocol References:

None = None

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

TAL CAN = Eurofins TestAmerica, Canton, 4101 Shuffel Street NW, North Canton, OH 44720, TEL (330)497-9396

Sample Summary

Client: SUMEC Energy Holdings Co. Ltd.
Project/Site: Solar Module TCLP

Job ID: 240-122464-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received	Asset ID
240-122464-1	SOLAR PANEL	Solid	11/14/19 00:00	11/18/19 11:10	

Detection Summary

Client: SUMEC Energy Holdings Co. Ltd.
Project/Site: Solar Module TCLP

Job ID: 240-122464-1

Client Sample ID: SOLAR PANEL

Lab Sample ID: 240-122464-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Lead	4.3		0.050		mg/L	1		6010B	TCLP

This Detection Summary does not include radiochemical test results.

Client Sample Results

Client: SUMEC Energy Holdings Co. Ltd.
Project/Site: Solar Module TCLP

Job ID: 240-122464-1

Client Sample ID: SOLAR PANEL
Date Collected: 11/14/19 00:00
Date Received: 11/18/19 11:10

Lab Sample ID: 240-122464-1
Matrix: Solid

Method: 6010B - Metals (ICP) - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		0.050		mg/L		11/26/19 14:00	11/27/19 10:08	1
Barium	ND		0.50		mg/L		11/26/19 14:00	11/27/19 10:08	1
Cadmium	ND		0.050		mg/L		11/26/19 14:00	11/27/19 10:08	1
Chromium	ND		0.050		mg/L		11/26/19 14:00	11/27/19 10:08	1
Lead	**4.3**		0.050		mg/L		11/26/19 14:00	11/27/19 10:08	1
Selenium	ND		0.050		mg/L		11/26/19 14:00	11/27/19 10:08	1
Silver	ND		0.050		mg/L		11/26/19 14:00	11/27/19 10:08	1

Method: 7470A - Mercury (CVAA) - TCLP

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.0020		mg/L		11/26/19 14:00	11/27/19 18:19	1

Method: 6010B - Metals (ICP)

Lab Sample ID: MB 240-412722/2-A
Matrix: Solid
Analysis Batch: 412928

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 412722

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:59	1
Barium	ND		0.50		mg/L		11/26/19 14:00	11/27/19 09:59	1
Cadmium	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:59	1
Chromium	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:59	1
Lead	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:59	1
Selenium	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:59	1
Silver	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:59	1

Lab Sample ID: LCS 240-412722/3-A
Matrix: Solid
Analysis Batch: 412928

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 412722

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Arsenic	2.00	2.15		mg/L		108	50 - 150
Barium	2.00	2.00		mg/L		100	50 - 150
Cadmium	1.00	1.05		mg/L		105	50 - 150
Chromium	1.00	1.01		mg/L		101	50 - 150
Lead	1.00	0.900		mg/L		90	50 - 150
Selenium	2.00	2.13		mg/L		106	50 - 150
Silver	0.100	0.107		mg/L		107	50 - 150

Lab Sample ID: LB 240-412574/1-B
Matrix: Solid
Analysis Batch: 412928

Client Sample ID: Method Blank
Prep Type: TCLP
Prep Batch: 412722

Analyte	LB Result	LB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Arsenic	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:54	1
Barium	ND		0.50		mg/L		11/26/19 14:00	11/27/19 09:54	1
Cadmium	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:54	1
Chromium	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:54	1
Lead	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:54	1
Selenium	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:54	1
Silver	ND		0.050		mg/L		11/26/19 14:00	11/27/19 09:54	1

Lab Sample ID: 240-122464-1 MS
Matrix: Solid
Analysis Batch: 412928

Client Sample ID: SOLAR PANEL
Prep Type: TCLP
Prep Batch: 412722

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Arsenic	ND		5.00	5.46		mg/L		109	75 - 125
Barium	ND		50.0	51.9		mg/L		103	75 - 125
Cadmium	ND		1.00	1.12		mg/L		112	75 - 125
Chromium	ND		5.00	5.38		mg/L		108	75 - 125
Lead	4.3		5.00	9.84		mg/L		110	75 - 125
Selenium	ND		1.00	1.14		mg/L		114	75 - 125
Silver	ND		1.00	1.07		mg/L		107	75 - 125

Method: 6010B - Metals (ICP) (Continued)

Lab Sample ID: 240-122464-1 MSD — **Client Sample ID: SOLAR PANEL**
Matrix: Solid — **Prep Type: TCLP**
Analysis Batch: 412928 — **Prep Batch: 412722**

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Arsenic	ND		5.00	5.59		mg/L		112	75 - 125	2	20
Barium	ND		50.0	54.0		mg/L		108	75 - 125	4	20
Cadmium	ND		1.00	1.14		mg/L		114	75 - 125	2	20
Chromium	ND		5.00	5.43		mg/L		109	75 - 125	1	20
Lead	4.3		5.00	9.95		mg/L		112	75 - 125	1	20
Selenium	ND		1.00	1.16		mg/L		116	75 - 125	2	20
Silver	ND		1.00	1.09		mg/L		109	75 - 125	2	20

Method: 7470A - Mercury (CVAA)

Lab Sample ID: MB 240-412725/2-A — **Client Sample ID: Method Blank**
Matrix: Solid — **Prep Type: Total/NA**
Analysis Batch: 413058 — **Prep Batch: 412725**

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.0020		mg/L		11/26/19 14:00	11/27/19 18:15	1

Lab Sample ID: LCS 240-412725/3-A — **Client Sample ID: Lab Control Sample**
Matrix: Solid — **Prep Type: Total/NA**
Analysis Batch: 413058 — **Prep Batch: 412725**

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Mercury	0.00500	0.00549		mg/L		110	80 - 120

Lab Sample ID: LB 240-412574/1-D — **Client Sample ID: Method Blank**
Matrix: Solid — **Prep Type: TCLP**
Analysis Batch: 413058 — **Prep Batch: 412725**

Analyte	LB Result	LB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	ND		0.0020		mg/L		11/26/19 14:00	11/27/19 18:13	1

Lab Sample ID: 240-122464-1 MS — **Client Sample ID: SOLAR PANEL**
Matrix: Solid — **Prep Type: TCLP**
Analysis Batch: 413058 — **Prep Batch: 412725**

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Mercury	ND		0.00500	0.00564		mg/L		113	80 - 120

Lab Sample ID: 240-122464-1 MSD — **Client Sample ID: SOLAR PANEL**
Matrix: Solid — **Prep Type: TCLP**
Analysis Batch: 413058 — **Prep Batch: 412725**

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Mercury	ND		0.00500	0.00563		mg/L		113	80 - 120	0	20

QC Association Summary

Client: SUMEC Energy Holdings Co. Ltd.
Project/Site: Solar Module TCLP

Job ID: 240-122464-1

Metals

Processed Batch: 412195

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-122464-1	SOLAR PANEL	TCLP	Solid	Part Size Red	
240-122464-1 MS	SOLAR PANEL	TCLP	Solid	Part Size Red	
240-122464-1 MSD	SOLAR PANEL	TCLP	Solid	Part Size Red	

Leach Batch: 412574

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-122464-1	SOLAR PANEL	TCLP	Solid	1311	412195
LB 240-412574/1-B	Method Blank	TCLP	Solid	1311	
LB 240-412574/1-D	Method Blank	TCLP	Solid	1311	
240-122464-1 MS	SOLAR PANEL	TCLP	Solid	1311	412195
240-122464-1 MSD	SOLAR PANEL	TCLP	Solid	1311	412195

Prep Batch: 412722

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-122464-1	SOLAR PANEL	TCLP	Solid	3010A	412574
LB 240-412574/1-B	Method Blank	TCLP	Solid	3010A	412574
MB 240-412722/2-A	Method Blank	Total/NA	Solid	3010A	
LCS 240-412722/3-A	Lab Control Sample	Total/NA	Solid	3010A	
240-122464-1 MS	SOLAR PANEL	TCLP	Solid	3010A	412574
240-122464-1 MSD	SOLAR PANEL	TCLP	Solid	3010A	412574

Prep Batch: 412725

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-122464-1	SOLAR PANEL	TCLP	Solid	7470A	412574
LB 240-412574/1-D	Method Blank	TCLP	Solid	7470A	412574
MB 240-412725/2-A	Method Blank	Total/NA	Solid	7470A	
LCS 240-412725/3-A	Lab Control Sample	Total/NA	Solid	7470A	
240-122464-1 MS	SOLAR PANEL	TCLP	Solid	7470A	412574
240-122464-1 MSD	SOLAR PANEL	TCLP	Solid	7470A	412574

Analysis Batch: 412928

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-122464-1	SOLAR PANEL	TCLP	Solid	6010B	412722
LB 240-412574/1-B	Method Blank	TCLP	Solid	6010B	412722
MB 240-412722/2-A	Method Blank	Total/NA	Solid	6010B	412722
LCS 240-412722/3-A	Lab Control Sample	Total/NA	Solid	6010B	412722
240-122464-1 MS	SOLAR PANEL	TCLP	Solid	6010B	412722
240-122464-1 MSD	SOLAR PANEL	TCLP	Solid	6010B	412722

Analysis Batch: 413058

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-122464-1	SOLAR PANEL	TCLP	Solid	7470A	412725
LB 240-412574/1-D	Method Blank	TCLP	Solid	7470A	412725
MB 240-412725/2-A	Method Blank	Total/NA	Solid	7470A	412725
LCS 240-412725/3-A	Lab Control Sample	Total/NA	Solid	7470A	412725
240-122464-1 MS	SOLAR PANEL	TCLP	Solid	7470A	412725
240-122464-1 MSD	SOLAR PANEL	TCLP	Solid	7470A	412725

Lab Chronicle

Client: SUMEC Energy Holdings Co. Ltd.
Project/Site: Solar Module TCLP

Job ID: 240-122464-1

Client Sample ID: SOLAR PANEL

Date Collected: 11/14/19 00:00
Date Received: 11/18/19 11:10

Lab Sample ID: 240-122464-1

Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
TCLP	Processed	Part Size Red			412195	11/22/19 08:42	POP	TAL CAN
TCLP	Leach	1311			412574	11/25/19 16:55	DRJ	TAL CAN
TCLP	Prep	3010A			412722	11/26/19 14:00	MRL	TAL CAN
TCLP	Analysis	6010B		1	412928	11/27/19 10:08	WKD	TAL CAN
TCLP	Processed	Part Size Red			412195	11/22/19 08:42	POP	TAL CAN
TCLP	Leach	1311			412574	11/25/19 16:55	DRJ	TAL CAN
TCLP	Prep	7470A			412725	11/26/19 14:00	MRL	TAL CAN
TCLP	Analysis	7470A		1	413058	11/27/19 18:19	SLD	TAL CAN

Laboratory References:

TAL CAN = Eurofins TestAmerica, Canton, 4101 Shuffel Street NW, North Canton, OH 44720, TEL (330)497-9396

Accreditation/Certification Summary

Client: SUMEC Energy Holdings Co. Ltd. Job ID: 240-122464-1
Project/Site: Solar Module TCLP

Laboratory: Eurofins TestAmerica, Canton

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
California	State Program	2927	02-23-20

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
7470A	7470A	Solid	Mercury

13.1/13.8

SUMEC

SUMEC ENERGY HOLDINGS CO.,LTD.
江苏苏美达能源控股有限公司

致TO Eurofins TestAmerica
4101 Shuffel Street NW, North Canton, OH 44720, USA

发票编号 INV.NO. SUMEC-EUROFINS-2019/1114
日期 DATE 2019/11/14

发　　票
COMMERCIAL INVOICE

L/C NO.

唛头及编号 Mark && Numbers	品名 Descriptions	数量 Quantities	单价 Unit Price	总价 Amount
N/M			USD	USD
	raw material sample of solar module	2 SET	5.00	10
		2 SET		10.00

TOTAL:PACKED IN: 1 CARTON
G/W: 1 KGS
N/W: 0.9 KGS

SUMEC ENERGY HOLDINGS CO.,LTD.
NO.3 XINGHUO ROAD, NATIONAL LEVEL NANJING HI-TECH ZONE, NANJING, 210061 P.R. CHINA

江苏苏美达能源控股有限公司
SUMEC ENERGY HOLDINGS CO.,LTD

Accepted by Lab 11/18/19
ETA 1110

240-122464 Chain of Custody

Eurofins TestAmerica Canton Sample Receipt Form/Narrative **Login # : 122464**
Canton Facility

Client: Sunec Energy Holdings Inc Site Name:

Cooler Received on: 11-18-19 Opened on: 11-18-19 1110

Cooler unpacked by: Ryan Cribler

FedEx: 1st Grd Exp UPS FAS Clipper Client Drop Off TestAmerica Courier Other DHL

Receipt After-hours: Drop-off Date/Time Storage Location

TestAmerica Cooler #: Foam Box Client Cooler Box Other

Packing material used: Bubble Wrap Foam Plastic Bag None Other

COOLANT: Wet Ice Blue Ice Dry Ice Water None

1. Cooler temperature upon receipt ☐ See Multiple Cooler Form
   IR GUN# IR-10 (CF +0.7 °C) Observed Cooler Temp. 13.1 °C Corrected Cooler Temp. 13.8 °C
   IR GUN #IR-11 (CF +0.9°C) Observed Cooler Temp. °C Corrected Cooler Temp. °C
2. Were tamper/custody seals on the outside of the cooler(s)? If Yes Quantity 1 Yes No
   -Were the seals on the outside of the cooler(s) signed & dated? Yes No NA
   -Were tamper/custody seals on the bottle(s) or bottle kits (LLHg/MeHg)? Yes No
   -Were tamper/custody seals intact and uncompromised? Yes No NA
3. Shippers' packing slip attached to the cooler(s)? Yes No
4. Did custody papers accompany the sample(s)? Yes No
5. Were the custody papers relinquished & signed in the appropriate place? Yes No
6. Was/were the person(s) who collected the samples clearly identified on the COC? Yes No
7. Did all bottles arrive in good condition (Unbroken)? Yes No
8. Could all bottle labels be reconciled with the COC? Yes No
9. Were correct bottle(s) used for the test(s) indicated? Yes No
10. Sufficient quantity received to perform indicated analyses? Yes No
11. Are these work share samples? Yes No
    If yes, Questions 12-16 have been checked at the originating laboratory.
12. Were all preserved sample(s) at the correct pH upon receipt? Yes No NA pH Strip Lot# HC995364
13. Were VOAs on the COC? Yes No
14. Were air bubbles >6 mm in any VOA vials? Larger than this. Yes No NA
15. Was a VOA trip blank present in the cooler(s)? Trip Blank Lot #: Yes No
16. Was a LL Hg or Me Hg trip blank present? Yes No

Tests that are not checked for pH by Receiving:
VOAs
Oil and Grease
TOC

Contacted PM Date by via Verbal Voice Mail Other

Concerning

17. CHAIN OF CUSTODY & SAMPLE DISCREPANCIES

Samples processed by:

Will log ID as "Solar Panel" sample date as 11/14/19 (date at top of COC/letter), no sample time. Will log TCLP metals w/ PSR per PM.

18. SAMPLE CONDITION

Sample(s) were received after the recommended holding time had expired.
Sample(s) were received in a broken container.
Sample(s) were received with bubble >6 mm in diameter. (Notify PM)

19. SAMPLE PRESERVATION

Sample(s) were further preserved in the laboratory.
Time preserved: Preservative(s) added/Lot number(s):

VOA Sample Preservation - Date/Time VOAs Frozen:

BL Companies
Architecture
Engineering
Environmental
Land Surveying

September 28, 2022

Mr. Kyle Perry
Verogy
150 Trumbull Street, 4th Floor
Hartford, CT 06103

Re:	Project:	Solar Installation on FedEx Distribution Facility
	Site:	49 FedEx Drive, Middletown, CT
	BL Project No.:	2201959

Dear Mr. Perry:

We have reviewed the available drawings for the building and have performed field verification of the roof structure for the facility at the above-referenced address as it relates to the installation of solar panels on the existing roofs. The roof design for the building is metal deck on open-web steel joists spanning to built-up pre-engineered metal frames. The roof framing is independent of the walls for this facility thus meaning that the walls are non-bearing walls, which is typical construction for buildings of this nature. The specific joists and steel framing sizes have been analyzed for their adequacy.

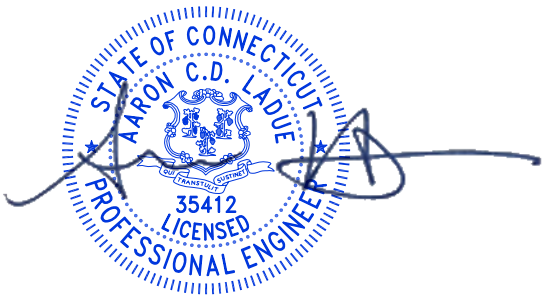
As it is not the intention to modify the code-required Snow Load capacity, we propose to calculate that actual in-place Dead Load of the roof construction, such as roofing, insulation, structural metal deck, structural joists, MEP components and ceilings that are hung from the roof structure. The difference between the calculated applied load and the design load will result in a "reserve capacity" which will be utilized for the weight of the solar arrays. The following indicates our calculated existing dead load weights:

Description	Actual Loads Warehouse Area
Roofing, Insulation & Decking	4.0 psf
Joists	2.0 psf
MEP, Sprinklers & Misc.	4.0 psf
Ceiling	0.0 psf
Dead Load Subtotal:	**10.0 psf**
Roof Snow Load (Bar Joists):	**30psf (All Areas)**
Roof Snow Load (Girders):	**30psf (All Areas)**

Based on our structural analysis, it is our opinion that there is capacity in the existing roof structure to accommodate the addition of strategically placed solar arrays with subarray weights of up to 5.0 pounds per square foot, without diminishing the code-required snow load capacity.

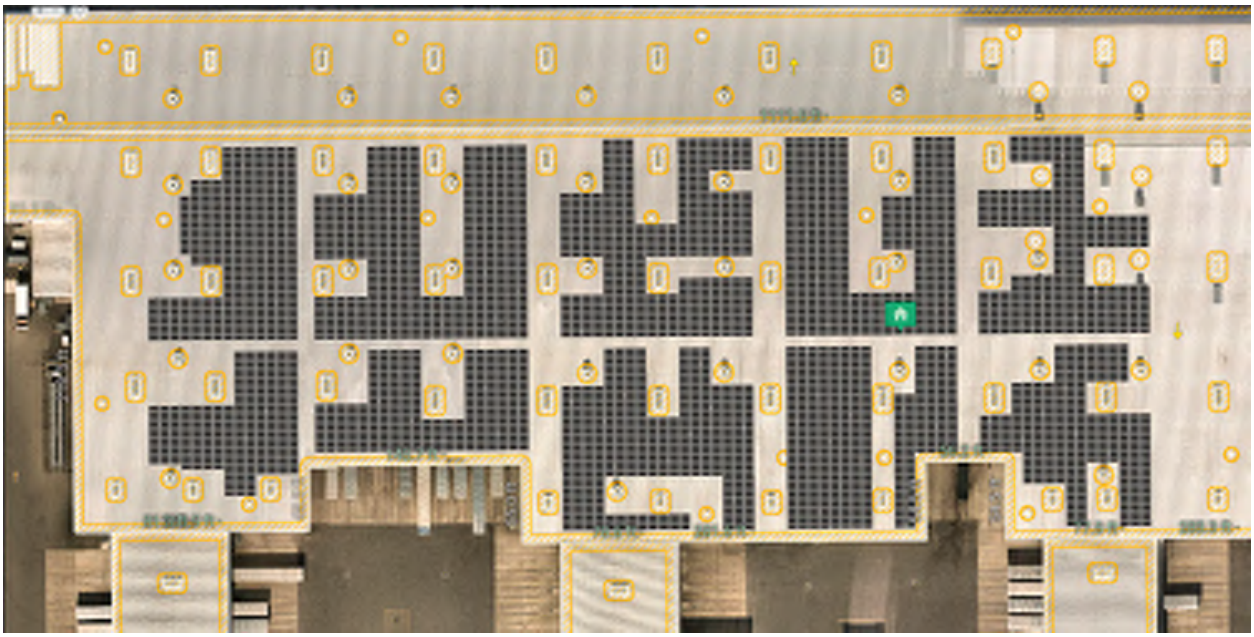
If you should have any further comments or questions regarding this project, please do not hesitate to contact me.

Sincerely,
BL COMPANIES, INC.



Aaron LaDue, PE
Structural Project Manager

Proposed Development:



Appendix B – Operation and Maintenance Plan

Operations and Maintenance Plan

1.5 MW AC Roof-Mounted Solar Photovoltaic Project at FedEx Distribution Center,

49 Fedex Drive, Middletown, Connecticut

Date:

November 2022

Prepared By:

VCP FX CT, LLC

Table of Contents

Operations and Maintenance Plan

1. Introduction

The owner of the Facility is responsible for maintaining and servicing the photovoltaic (PV) electric system as well as the related facilities during the operational phase of the project. This O&M Plan describes the project components, commissioning procedures, monitoring system, maintenance provisions and emergency response

2. Project Description

The proposed Project is a 1.5MW AC roof mounted solar array located at 49 Fedex Drive, Middletown, Connecticut that will consist of solar modules, inverters, switchgear, transformers, electrical systems interconnected behind the meter of the electrical services on Site.

3. Contact Information

Table 1. Project Contact Information

Owner	Fed Ex Ground Package System, Inc. PO Box 71850 Phoenix, AZ 85050 Attn: TBD Phone: TBD Email: TBD
O&M Service Provider	To be determined

4. Commissioning

Prior to the project reaching operation, the following inspections and tests will be performed by the O&M provider. The results will be included in the projects commissioning report.

- Full visual Inspection
- Mechanical inspection including torque verification of critical connections
- String Testing (IV curve test)
- Full System Production Evaluation
- Thermal Scanning

5. Monitoring

The O&M provider will utilize a continuous 24/7 remote monitoring system to provide alarm and performance data of the system. The monitoring system will include full site and inverter level production and alarms as well as site weather and irradiance data. The O&M provider will analyze performance data to make sure that the system is performing as designed and will be responsible for dispatching crews for system maintenance and repair related issues. The O&M provider will be contractually obligated to comply with this O&M Plan, as well as the conditions of all permits or regulatory approvals.

6. Maintenance

O&M services are outlined below. (The frequency of these services is outlined in Table 2)

6.1. Site Access

The solar array and all associated equipment shall be located on the roof of the existing building. Access to that facility shall be granted to authorized personnel only. Access to that facility shall be arranged with the owner or O&M provider as identified in table 1. Provisions will be in place for Emergency personnel to access the site via existing facility access.

6.2. Equipment Maintenance

The O&M provider and/or its authorized subcontractors will inspect and maintain electrical and PV equipment in accordance with the manufacturers requirements to maintain proper operation and warranty status.

The O&M provider will also perform the following inspections. The results from these inspections/tests will be provided in an O&M inspection report.

- The operation of all safety devices will be reviewed and corrected to maintain proper function.
- Full visual Inspection of all equipment, subassemblies, wiring, connectors, etc.
- Thermal Scanning of electronic equipment, wiring terminations, connectors, etc.
- Mechanical inspection including torque verification of critical connections
- String Testing (IV curve test)
- Air filter elements

6.3. Site Maintenance

The O&M provider and/or its authorized subcontractors will visit the site monthly to assess site conditions and perform maintenance as needed. Signage and egress functionality will be inspected at this time and repaired, if necessary.

6.3.1. Panel Cleaning

Panel Cleaning is rarely necessary in the Northeast, but if that panels are to experience enough soiling to adversely affect production the panels will be cleaned using water and soft bristle brooms. No chemicals will be used.

6.3.2. Snow Maintenance

Snow removal is not expected to be necessary for this Facility.

6.4. Long-Term Stormwater Maintenance Plan

Currently, the extent of any stormwater management devices is unknown. The O&M team will provide maintenance in accordance with the approved stormwater maintenance plan produced by the engineer of record.

Table 2. Scheduled Maintenance Activity

Task	Frequency
On-Site Ground Inspection	Monthly
Visual Array & Equipment Inspection	1x per year or per equipment manufacturer requirements
Mechanical and Electrical Inspections	1x per year or per equipment manufacturer requirements
Panel Cleaning	As Needed
Snow Removal	Not Expected

7. Emergency Response

The Owner and their representatives will coordinate with the Town of Windsor police and fire departments regarding access to the facility and emergency shutoff switches. Table 3 provides an emergency contact list for the Town of Windsor. Provisions will be in place for Emergency personnel to access the site via existing facility access.

Table 3. Town of Windsor Emergency Contacts

Emergencies	Dial 911
Middletown Police Station	Erik M. Costa, Chief of Police 222 Main Street Middletown, CT 06457 Emergency Calls: 911 Routine Calls: (860)638-4100
Middletown Fire Department	Fire Marshal 653 East Street Middletown, CT 06457 Emergency Calls: 911 Routine Calls: (860)632-2690

Appendix C – Decommissioning Plan

Decommissioning Plan

1.5 MW AC Roof-Mounted Solar Photovoltaic Project at FedEx Distribution Center,

49 Fedex Drive, Middletown, Connecticut

Date:

November 2022

Prepared By:

VCP FX CT, LLC

Table of Contents

Decommissioning Plan

1. Overview

After the proposed Photovoltaic Facility has reached the end of its operational lifetime, the current owners of the proposed Photovoltaic (PV) facility will be responsible to decommission the project. The Project has an anticipated service life of 35 years. It is anticipated that advances in technology and efficiency over that timeframe will create an economic advantage in replacing the project.

Decommissioning of a PV facility is the removal of all system components associated with the generating system and restoring the site to as close to pre-construction conditions as possible. Decommissioning procedures are developed to ensure environmental protection, public safety and health, and that the work being performed is in compliance with all applicable regulations.

The Facility owner will be responsible for:

- All decommissioning costs
- Obtaining all permits required for the decommissioning, removal and legal disposal of system components prior to the start of decommissioning activities
- The complete decommissioning of the facility, including the removal and disposal of all equipment and restoration of the site in accordance with applicable permits and in compliance with all applicable rules and regulations in effect governing material disposal
- Any other measures that the Siting Council may require in its approval of this Project.

2. Estimated Costs

The industry generally recognizes that a PV facility is constructed of components that will remain valuable at the time of decommissioning. We expect that the value of the components of the array at the end of the project's useful life in either a salvage or re-sale scenario will be greater than the expected cost of decommissioning the facility.

3. Materials

3.1. PV Modules

PV Modules are constructed of glass, aluminum, plastic, semiconductor rigid silicon cells, internal electrical conductors, silver solder, plus a variety of micro materials. Glass typically makes up 80% of the weight of a module.

3.2. Metals

Steel from racking, conduits, electrical enclosures, equipment buildings, and storage containers; aluminum from racking, module frames, electrical wire, and transformers; stainless steel from fasteners, electrical enclosures, and racking; copper from electrical wire, transformers, and inverters.

3.3. Plastics

A limited amount of plastic materials are used in PV systems due to a system's continuous exposure to the elements and long operational lifetime. Plastics typically are found in PV facilities as wire insulation, electrical enclosures, control and monitoring equipment, and inverter components. Plastic laminate films are also used in most PV module assemblies.

3.4. Concrete

Equipment pads and footings. Includes both reinforced and non-reinforced concrete.

4. Decommissioning Plan

4.1. Preparation & Mobilization

Prior to decommissioning the system, the owner of the facility and the decommissioning contractors will begin the preparation and planning phase of the project. The decommissioning process shall be completed no later than 2 years following the discontinuation of operations of the facility. The onsite deconstruction and restoration effort may take up to four months to complete. Prior to decommissioning activity taking place a site assessment will take place to evaluate site conditions and put a protection plan together to protect surrounding natural resources. The existing parking area and driveways for the existing Site will be utilized for decommissioning activities. Debris will be placed in dumpsters on-site until transportation to proper disposal facilities is arranged.

4.2. Photovoltaic Equipment Removal

- The system will be de-energized from the utility power grid. The infrastructure connecting the facility to the utility power grid will be removed unless the landowner determines that the electrical service line will be beneficial for future use of the site, in which case the line may remain after decommissioning.
- All wirings, cables, conduits, panelboards, inverters, transformers and associated equipment will be uninstalled and recycled as applicable.
- PV modules will be uninstalled and recycled as applicable.
- The steel racking system will be disassembled and recycled as applicable
- The demolition debris and removed equipment may be cut or dismantled into smaller pieces that can be safely lifted or carried by the deconstruction equipment being used. Most of the glass and steel and aluminum will be processed for transportation and delivery to an off-site recycling center. Minimal non-recyclable materials are anticipated; these will be properly disposed of at a qualified disposal facility.

5. Health and Safety Concerns

Site decommissioning will entail the use of heavy equipment, the handling of heavy and sharp objects and limited exposure to potentially live electrical components. A Health and Safety Plan will be created based on the individual characteristics of the site to minimize and eliminate all possible risks and hazards. The Health and Safety Plan will include a Job Hazard Analysis that will analyze each step of construction for hazards, along with any climate conditions or hazardous materials that may be seen or used throughout the duration of the job. The plan will outline steps to take if a hazard is identified and how to proceed with each hazard. Along with this, all workers will have training and personal protective equipment (PPE) in compliance with OSHA standards. A daily toolbox talk will be held where the foreman or supervisor will go over daily hazards and activities to be completed.

Appendix D – Abutting Property Owner List and Sample Notice Letter

Abutters List Notification via Certificate of Mailing
1.5 MW AC Roof-Mounted Solar Photovoltaic Electric Generating Facility at Fed Ex Distribution Center, 49 Fedex Drive, Middletown, Connecticut

SITE HOUSE#	STREET	TYPE	SITE CITY	SITE STATE	SITE ZIP	OWNER_FIRST NAME	OWNER_LAST NAME	MAIL HOUSE#	MAIL STREET	MAIL TYPE	MAIL CITY	MAIL STATE	MAIL ZIP	MBL
1125	MIDDLE	ST	MIDDLETOWN	CT	06457		MIDDLE STREET LLC	1125	MIDDLE	ST	MIDDLETOWN	CT	06457	01-0077
49	FEDEX	ST	MIDDLETOWN	CT	06457		FEDEX GROUND PACKAGE SYSTEM INC	71850	PO BOX		PHOENIX	AZ	85050	05-0047
1035	MIDDLE	ST	MIDDLETOWN	CT	06457	ROBERT T & JOYCE L	DEZI	1035	MIDDLE	ST	MIDDLETOWN	CT	06457	01-0073
	INDUSTRIAL PARK	DR	MIDDLETOWN	CT	06457		FEDEX GROUND PACKAGE SYSTEM INC	1000	FEDEX	DR	MOON TOWNSHIP	PA	15108	05-0048
	INDUSTRIAL PARK	RD	MIDDLETOWN	CT	06457		STATE OF CONNECTICUT	450	CAPITOL	AVE	HARTFORD	CT	06106	05-0050
362	INDUSTRIAL PARK	RD	MIDDLETOWN	CT	06457		GML HOLDINGS LLC	737	PO BOX		MIDDLETOWN	CT	06457	05-0020
	INDUSTRIAL PARK	RD	MIDDLETOWN	CT	06457		FEDEX GROUND PACKAGE SYSTEM INC	1000	FEDEX	DR	MOON TOWNSHIP	PA	15108	05-0049
1001	MIDDLE	ST	MIDDLETOWN	CT	06457		US BANK TRUST NA TRUSTEE	3701	REGENT	BLVD	IRVING	TX	75063	01-0070
	MIDDLE	ST	MIDDLETOWN	CT	06457		FLETCHCO LLC	17	TURNBERRY	RD	WALLINGFORD	CT	06492	O1-0075
	MIDDLE	ST	MIDDLETOWN	CT	06457		NADEKA LLC	14	PINE ORCHARD	LA	KILLINGWORTH	CT	06419	01-0076
1021	MIDDLE	ST	MIDDLETOWN	CT	06457		1021 MIDDLE LLC	17	TURNBERRY	RD	WALLINGFORD	CT	06492	01-0072
	MIDDLE	ST	MIDDLETOWN	CT	06457		SHARED DREAMS REALTY LLC	351	WEST	ST	HEBRON	CT	06248	01-0078
333	INDUSTRIAL PARK	RD	MIDDLETOWN	CT	06457		ASPEN HOLDINGS LLC	333	INDUSTRIAL PARK	RD	MIDDLETOWN	CT	06457	05-0013
35	PHILMACK	DR	MIDDLETOWN	CT	06457		MINC LLC	17	TURNBERRY	RD	WALLINGFORD	CT	06492	01-0068
	INDUSTRIAL PARK	RD	MIDDLETOWN	CT	06457		ROSCOMMON INFINITY LLC (68% INT) &	184	FERN	AVE	LITCHFIELD	CT	06759	05-0011
1184	MIDDLE	ST	MIDDLETOWN	CT	06457	DAVID E	DUCKI	1184	MIDDLE	ST	MIDDLETOWN	CT	06457	05-0001
975	MIDDLE	ST	MIDDLETOWN	CT	06457		P INC LLC	17	TURNBERRY	RD	WALLINGFORD	CT	06492	01-0069
1011	MIDDLE	ST	MIDDLETOWN	CT	06457	MICHAEL & LISA	ZONA	1011	MIDDLE	ST	MIDDLETOWN	CT	06457	01-0071
929	MIDDLE	ST	MIDDLETOWN	CT	06457	JUDITH ANN & CHARLES	CECCHINI	622	SAYBROOK	RD	MIDDLETOWN	CT	06457	01-0065
	MIDDLE	RD	MIDDLETOWN	CT	06457		CITY OF MIDDLETOWN	245	DEKOVEN	DR	MIDDLETOWN	CT	06457	05-0004
1055	MIDDLE	ST	MIDDLETOWN	CT	06457		SOUTHERN NEW ENGLAND TELEPHONE CO	2629	PO BOX		ADDISON	TX	75001	01-0074
930	MIDDLE	ST	MIDDLETOWN	CT	06457		AETNA LIFE & INSURANCE COMPANY	151	FARMINGTON	AVE	HARTFORD	CT	06156	05-0003
35	KIRBY	RD	CROMWELL	CT	06416		RANDA LLC	42	SKYVIEW	DR	BERLIN	CT	06037	01-03A
9	KIRBY	RD	CROMWELL	CT	06416		MOUTA CARLOS A C/O WESTSIDE PROPERTY MGMT	20174	PARK	ST	HARTFORD	CT	06106	01-4
1	KIRBY	RD	CROMWELL	CT	06416		ONE KIRBY ROAD C LLC	2074	PARK	ST	HARTFORD	CT	06106	01-6
127	BERLIN	RD	CROMWELL	CT	06416		PKP INTEREST LLC	4	MORGAN	PL	AVON	CT	06001	01-6B
505	MAIN	ST	BERLIN	CT	06023	CHRISTOPHER P & NANC	CASEY	505	MAIN	ST	EAST BERLIN	CT	06023	23-2-152-9
39	DIVISION	ST	BERLIN	CT	06023	RACHEL E	MILLER	39	DIVISION	ST	EAST BERLIN	CT	06023	23-2-152-11
53	DIVISION	ST	BERLIN	CT	06023	GIUSEPPE & JENNIFER L	DISALVO & LIONETTU	53	DIVISION	ST	EAST BERLIN	CT	06023	23-2-152-12
65	DIVISION	ST	BERLIN	CT	06023	RICHARD J & ROBYN L	COP	65	DIVISION	ST	EAST BERLIN	CT	06023	23-2-152-13
77	DIVISION	ST	BERLIN	CT	06023	JOSEPH A	AYOTTE	77	DIVISION	ST	EAST BERLIN	CT	06023	23-2-152-14
93	DIVISION	ST	BERLIN	CT	06023	ANNA	RODZIEWICZ	93	DIVISION	ST	EAST BERLIN	CT	06023	23-2-152-15
109	DIVISION	ST	BERLIN	CT	06023	MARIO D	VINCENZO	109	DIVISION	ST	EAST BERLIN	CT	06023	23-2-152-15A

Bradley Parsons
development@verogy.com
(860) 288-7215 x715
150 Trumbull St., 4th Floor
Hartford, CT 06103
Verogy.com

November 11, 2022

Name
Address Line 1
Address Line 2

Re: VCP FX CT, LLC d/b/a Verogy – Notice of Intent to File a Petition for Declaratory Ruling for the Construction, Operation, and Maintenance of a 1.5 MW AC Roof-Mounted Solar Photovoltaic Electric Generating FedEx Distribution Center, 49 Fedex Drive, Middletown Connecticut

Current Resident:

Pursuant to the provisions of the Regulations of Connecticut State Agencies, Section 16-50j-40(a), this letter serves as notice that VCP FX CT, LLC d/b/a Verogy ("Verogy") intends to file a Petition for Declaratory Ruling ("Petition") with the Connecticut Siting Council ("Council") on or about November 18, 2022 seeking approval for the construction, operation, and maintenance, of a 1.5 megawatt ("MW") alternating current ("AC") roof-mounted solar photovoltaic electric generating facility, including all its associated equipment, ("Project") at the Federal Express distribution center located at 49 Fedex Drive in Middletown, CT ("Project Site"). The Project will be located on the roof of the existing building and interconnected to the existing transformers and electrical room on the west side of the building. The Project Site is owned by Fed Ex Ground Package System, Inc and is bounded by Division Street and the Mattabesset River to the north, Industrial Park Drive to the east, industrial & undeveloped properties to the south, and Middle Street to the west. The town boundary with Cromwell is the Mattabesset River located along the eastern end of the northern property boundary and the town boundary with Berlin is located along Division Street, the western end of the northern property boundary.

The proposed Project will consist of the installation of solar modules and inverters on the roof of the building and electrical conduit and wire from the roof of the building to the existing electrical room. The Project will be accessed through the existing driveway and parking lot serving the existing distribution center. We have attached a Proposed Conditions figure showing the additional detail regarding the location of the project.

Pursuant to the provisions of the Connecticut General Statuses Section 16-50g and the following sections, the location of certain Project features may change as this Petition proceeds through the Council's regulatory review process.

If you have any questions please feel free to contact me at development@verogy.com or (860) 288-7215 x715. You may also contact the Siting Council directly at 860.827.2935.

Sincerely,

Bradley J. Parsons
Director of Design and Permitting

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	Postmaster, per *(name of receiving employee)*	39	

USPS® Tracking Number Firm-specific Identifier	Address (Name, Street, City, State, and ZIP Code™)	Postage	Fee	Special Handling	Parcel Airlift
1.	MIDDLE STREET LLC 1125 MIDDLE ST MIDDLETOWN, CT 06457				
2.	FEDEX GROUND PACKAGE SYSTEM INC PO Box 71850 PHOENIX, AZ 85050				
3.	ROBERT T & JOYCE L DEZI 1035 MIDDLE ST MIDDLETOWN, CT 06457				
4.	FEDEX GROUND PACKAGE SYSTEM INC 1000 FEDEX DR MOON TOWNSHIP, PA 15108				
5.	STATE OF CONNECTICUT 450 CAPITOL AVE HARTFORD, CT 06106				
6.	GML HOLDINGS LLC PO BOX 737 MIDDLETOWN, CT 06457				

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1.	FEDEX GROUND PACKAGE SYSTEM INC 1000 FEDEX DR MOON TOWNSHIP, PA 15108				
2.	US BANK TRUST NA TRUSTEE 3701 REGENT BLVD IRVING, TX 75063				
3.	FLETCHCO LLC 17 TURNBERRY RD WALLINGFORD, CT 06492				
4.	NADEKA LLC 14 PINE ORCHARD LA KILLINGWORTH, CT 06419				
5.	1021 MIDDLE LLC 17 TURNBERRY RD WALLINGFORD, CT 06492				
6.	SHARED DREAMS REALTY LLC 351 WEST ST HEBRON, CT 06248				

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1.	ASPEN HOLDINGS LLC 333 INDUSTRIAL PARK RD MIDDLETOWN, CT 06457				
2.	MINC LLC 17 TURNBERRY RD WALLINGFORD, CT 06492				
3.	ROSCOMMON INFINITY LLC (68% INT) & 184 FERN AVE LITCHFIELD, CT 06759				
4.	DAVID E DUCKI 1184 MIDDLE ST MIDDLETOWN, CT 06457				
5.	P INC LLC 17 TURNBERRY RD WALLINGFORD, CT 06492				
6.	MICHAEL & LISA ZONA 1011 MIDDLE ST MIDDLETOWN, CT 06457				

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1.	JUDITH ANN & CHARLES S CECCHINI 622 SAYBROOK RD MIDDLETOWN, CT 06457				
2.	CITY OF MIDDLETOWN 245 DEKOVEN DR MIDDLETOWN, CT 06457				
3.	SOUTHERN NEW ENGLAND TELEPHONE CO PO BOX 2629 ADDISON, TX 75001				
4.	AETNA LIFE & INSURANCE COMPANY 151 FARMINGTON AVE HARTFORD, CT 06156				
5.	RANDA LLC 42 SKYVIEW DR BERLIN, CT 06037				
6.	MOUTA CARLOS A C/O WESTSIDE PROPERTY MGMT 20174 PARK ST HARTFORD, CT 06106				

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1.	ONE KIRBY ROAD C LLC 2074 PARK ST HARTFORD, CT 06106				
2.	PKP INTEREST LLC 4 MORGAN PL AVON, CT 06001				
3.	CHRISTOPHER P & NANCY K ASEY 505 MAIN ST EAST BERLIN, CT 06023				
4.	CHRISTOPHER P & NANCY K ASEY 505 MAIN ST EAST BERLIN, CT 06023				
5.	RACHEL E MILLER 39 DIVISIO ST EAST BERLIN, CT 06023				
6.	GIUSEPPE & JENNIFER L DISALVO & LIONETTU 53 DIVISION ST EAST BERLIN, CT 06023				

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1.	RICHARD J & ROBYN L COP 65 DIVISION ST EAST BERLIN, CT 06023				
2.	JOSEPH A AYOTTE 77 DIVISION ST EAST BERLIN, CT 06023				
3.	ANNA RODZIEWICZ 93 DIVISION ST EAST BERLIN, CT 06023				
4.	MARIO D VINCENZO 109 DIVISION ST EAST BERLIN, CT 06023				
5.					
6.					

Appendix E – List of Municipal Officials and Government Agencies and Sample Notice Letter

1.5 MW AC Roof-Mounted Solar Photovoltaic Electric Generating Facility at Fed Ex Distribution Center, 49 Fedex Drive, Middletown, Connecticut
Notification via Certificate of Mailing to Government Officials

Town/Agency	Name	Title	Mailing Address	Town	State	Zip Code
City of Middletown	Benjamin Florsheim	Mayor	245 DeKoven Drive	Middletown	CT	06457
City of Middletown	Ashley Flynn-Natale	Town Clerk	245 DeKoven Drive	Middletown	CT	06457
City of Middletown	Marek Kozikowski	Director of Land Use	245 DeKoven Drive	Middletown	CT	06457
City of Middletown	Vincent Loffredo	Chair, Economic Development Commission	245 DeKoven Drive	Middletown	CT	06457
City of Middletown	Christopher Holden	Director of Public Works	245 DeKoven Drive	Middletown	CT	06457
City of Middletown	Thomas Pattavina	Chair, Planning and Zoning Commission	245 DeKoven Drive	Middletown	CT	06457
City of Middletown	Elizabeth Holder	Chairman, Commission on Conservation & Agriculture	245 DeKoven Drive	Middletown	CT	06457
City of Middletown	Joseph Carta	Chair, Inland Wetlands and Watercourses Agency	245 DeKoven Drive	Middletown	CT	06457
Town of Cromwell	Anthony Salvatore	Town Manager	41 West Street	Cromwell	CT	06416
Town of Cromwell	Steve Fortenbach	Mayor	41 West Street	Cromwell	CT	06416
Town of Cromwell	JoAnn Doyle	Town Clerk	41 West Street	Cromwell	CT	06416
Town of Cromwell	Lou Spina	Director of Public Works	41 West Street	Cromwell	CT	06416
Town of Cromwell	Jon Harriman	Town Engineer	41 West Street	Cromwell	CT	06416
Town of Cromwell	Stuart Popper	Director of Planning & Development	41 West Street	Cromwell	CT	06416
Town of Berlin	Arosha Jayawickrema	Town Manager	240 Kensington Road	Berlin	CT	06037
Town of Berlin	Mark Kaczynski	Mayor	187 Castlewood Drive	Berlin	CT	06037
Town of Berlin	Kate Wall	Town Clerk	240 Kensington Road	Berlin	CT	06037
Town of Berlin	Mik Ahern	Town Engineer/Public Works Director	240 Kensington Road	Berlin	CT	06037
Town of Berlin	Maureen Giusti	Town Planner/Zoning Enforcement Officer	240 Kensington Road	Berlin	CT	06037
Town of Berlin	Fran Semnoski	Land Use Administrator	240 Kensington Road	Berlin	CT	06037
United States Senate	Richard Blumenthal	Senator	90 State House Square, 10th Floor	Hartford	CT	06103
United States Senate	Christopher Murphy	Senator	Colt Gateway 120 Huyshope Avenue, Suite 401	Hartford	CT	06106
United States House of Representatives	Rosa L. DeLauro	US Representative	59 Elm Street	New Haven	CT	06510
Connecticut General Assembly	Mary Daugherty Abrams	State Senator	Legislative Office Building, Room 3300 300 Capital Ave	Hartford	CT	06106
Connecticut General Assembly	Brandon Chafee	State Representative	Legislative Office Building, Room 4014 300 Capital Ave	Hartford	CT	06106
Capital Region Council of Governments	Matt Hart	Executive Director	241 Main Street	Hartford	CT	06106
State of Connecticut Office of the Attorney General	William Tong	Attorney General	165 Capitol Ave.	Hartford	CT	06106
State of Connecticut Department of Energy and Environmental Protection	Katie Dykes	Commissioner	79 Elm St.	Hartford	CT	06106-5127
State of Connecticut Department of Public Health	Dr. Manisha Juthani	Commissioner	410 Capitol Ave.	Hartford	CT	06134
State of Connecticut Council on Environmental Quality	Keith Ainsworth	Acting Chair	79 Elm St.	Hartford	CT	06106
State of Connecticut Department of Agriculture	Bryan P. Hurlburt	Commissioner	450 Columbus Blvd., Suite 701	Hartford	CT	06103
State of Connecticut Public Utilities Regulatory Authority	Marissa Paslick Gillett	Chairman	10 Franklin Square	New Britain	CT	06051
State of Connecticut Office of Policy and Management	Jeffrey R. Beckham	Acting Secretary	450 Capitol Ave.	Hartford	CT	06106
State of Connecticut Department of Economic and Community Development	David Lehman	Commissioner	450 Columbus Blvd.	Hartford	CT	06103
State of Connecticut Department of Transportation	Joseph Giulietti	Commissioner	2800 Berlin Turnpike	Newington	CT	06111
State of Connecticut Division of Emergency Management and Homeland Security	James C. Rovella	Commissioner	1111 Country Club Rd.	Middletown	CT	06457
State of Connecticut Department of Consumer Protection	Michelle H. Seagull	Commissioner	450 Columbus Blvd., Suite 901	Hartford	CT	06103
State of Connecticut Department of Administrative Services	Michelle Gilman	Commissioner	450 Columbus Blvd.	Hartford	CT	06103
State of Connecticut Department of Labor	Danté Bartolomeo	Commissioner	200 Folly Brook Blvd.	Wethersfield	CT	06109

Bradley Parsons
development@verogy.com
(860) 288-7215 x715
150 Trumbull St., 4th Floor
Hartford, CT 06103
Verogy.com

November 11, 2022

Name
Address Line 1
Address Line 2

Re: VCP FX CT, LLC d/b/a Verogy – Notice of Intent to File a Petition for Declaratory Ruling for the Construction, Operation, and Maintenance of a 1.5 MW AC Roof-Mounted Solar Photovoltaic Electric Generating FedEx Distribution Center, 49 Fedex Drive, Middletown Connecticut

Dear Official:

Pursuant to the provisions of the Regulations of Connecticut State Agencies, Section 16-50j-40(a), this letter serves as notice that VCP FX CT, LLC d/b/a Verogy ("Verogy") intends to file a Petition for Declaratory Ruling ("Petition") with the Connecticut Siting Council ("Council") on or about November 18, 2022 seeking approval for the construction, operation, and maintenance, of a 1.5 megawatt ("MW") alternating current ("AC") roof-mounted solar photovoltaic electric generating facility, including all its associated equipment, ("Project") at the Federal Express distribution center located at 49 Fedex Drive in Middletown, CT ("Project Site"). The Project will be located on the roof of the existing building and interconnected to the existing transformers and electrical room on the west side of the building. The Project Site is owned by Fed Ex Ground Package System, Inc and is bounded by Division Street and the Mattabesset River to the north, Industrial Park Drive to the east, industrial & undeveloped properties to the south, and Middle Street to the west. The town boundary with Cromwell is the Mattabesset River located along the eastern end of the northern property boundary and the town boundary with Berlin is located along Division Street, the western end of the northern property boundary.

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Pursuant to the provisions of the Connecticut General Statuses Section 16-50g and the following sections, the location of certain Project features may change as this Petition proceeds through the Council's regulatory review process.

If you have any questions please feel free to contact me at development@verogy.com or (860) 288-7215 x715. You may also contact the Siting Council directly at 860.827.2935.

Sincerely,

Bradley J. Parsons
Director of Design and Permitting

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VCP FX CT, LLC
150 Trumbull Street, 4th Floor
Hartford, CT 06103

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Postmaster, per *(name of receiving employee)*

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06096
NOV 14, 22
AMOUNT
$16.50
R2303S101382-11

BRADLEY STATION
NOV 13 2022

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1.	Benjamin Florsheim City of Middletown 245 DeKoven Drive Middletown, CT 6457				
2.	Ashley Flynn-Natale City of Middletown 245 DeKoven Drive Middletown, CT 6457				
3.	Marek Kozikowski City of Middletown 245 DeKoven Drive Middletown, CT 6457				
4.	Vincent Loffredo City of Middletown 245 DeKoven Drive Middletown, CT 6457				
5.	Christopher Holden City of Middletown 245 DeKoven Drive Middletown, CT 6457				
6.	Thomas Pattavina City of Middletown 245 DeKoven Drive Middletown, CT 6457				

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	Postmaster, per *(name of receiving employee)*		

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1.	Elizabeth Holder City of Middletown 245 DeKoven Drive Middletown, CT 6457				
2.	Joseph Carta City of Middletown 245 DeKoven Drive Middletown, CT 6457				
3.	Anthony Salvatore Town of Cromwell 41 West Street Cromwell, CT 6416				
4.	Steve Fortenbach Town of Cromwell 41 West Street Cromwell, CT 6416				
5.	JoAnn Doyle Town of Cromwell 41 West Street Cromwell, CT 6416				
6.	Lou Spina Town of Cromwell 41 West Street Cromwell, CT 6416				

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VCP FX CT, LLC 150 Trumbull Street, 4th Floor Hartford, CT 06103	6	6	
	Postmaster, per *(name of receiving employee)*		

USPS® Tracking Number Firm-specific Identifier	Address (Name, Street, City, State, and ZIP Code™)	Postage	Fee	Special Handling	Parcel Airlift
1.	Jon Harriman Town of Cromwell 41 West Street Cromwell, CT 6416				
2.	Stuart Popper Town of Cromwell 41 West Street Cromwell, CT 6416				
3.	Arosha Jayawickrema Town of Berlin 240 Kensington Road Berlin, CT 6037				
4.	Mark Kaczynski Town of Berlin 187 Castlewood Drive Berlin, CT 6037				
5.	Kate Wall Town of Berlin 240 Kensington Road Berlin, CT 6037				
6.	Mik Ahern Town of Berlin 240 Kensington Road Berlin, CT 6037				

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1.	Maureen Giusti Town of Berlin 240 Kensington Road Berlin, CT 6037				
2.	Fran Semnoski Town of Berlin 240 Kensington Road Berlin, CT 6037				
3.	Richard Blumenthal United States Senate 90 State House Square, 10th Floor Hartford, CT 6103				
4.	Christopher Murphy United States Senate Colt Gateway 120 Huyshope Avenue, Suite 401 Hartford, CT 6106				
5.	Rosa L. DeLauro United States House of Representatives 59 Elm Street New Haven, CT 6510				
6.	Mary Daugherty Abrams CT General Assembly Legislative Office Building, Room 3300 300 Capital Ave Hartford, CT 6106				

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1.	Brandon Chafee CT General Assembly Legislative Office Building, Room 4014 300 Capital Ave Hartford, CT 6106				
2.	Matt Hart Capital Region Council of Governments 241 Main Street Hartford, CT 6106				
3.	William Tong State of CT Office of the Attorney General 165 Capitol Ave. Hartford, CT 6106				
4.	Katie Dykes State of CT DEEP 79 Elm St. Hartford, CT 6106				
5.	Dr. Manisha Juthani State of CT Dept. of Public Health 410 Capitol Ave. Hartford, CT 6134				
6.	Keith Ainsworth State of CT Council on Environmental Quality 79 Elm St. Hartford, CT 6106				

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USPS® Tracking Number Firm-specific Identifier	Address (Name, Street, City, State, and ZIP Code™)	Postage	Fee	Special Handling	Parcel Airlift
1.	Bryan P. Hurlburt State of CT Dept. of Agriculture 450 Columbus Blvd., Suite 701 Hartford, CT 6103				
2.	Marissa Paslick Gillett State of CT Public Utilities Regulatory Authority 10 Franklin Square New Britain, CT 6051				
3.	Jeffrey R. Beckham State of CT Office of Policy and Management 450 Capitol Ave. Hartford, CT 6106				
4.	David Lehman, State of CT Dept. of Economic &Community Development 450 Columbus Blvd. Hartford, CT 6103				
5.	Joseph Giulietti State of CT Dept. of Transportation 2800 Berlin Turnpike Newington, CT 6111				
6.	James C. Rovella, State of CT Division of Emergency Mgmt. & Homeland Security 1111 Country Club Rd. Middletown, CT 6457				

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	Postmaster, per *(name of receiving employee)*		

USPS® Tracking Number Firm-specific Identifier	Address (Name, Street, City, State, and ZIP Code™)	Postage	Fee	Special Handling	Parcel Airlift
1.	Michelle H. Seagull State of CT Dept. of Consumer Protection 450 Columbus Blvd., Suite 901 Hartford, CT 6103				
2.	Michelle Gilman State of CT Dept. of Administrative Services 450 Columbus Blvd. Hartford, CT 6103				
3.	Danté Bartolomeo State of CT Dept. of Labor 200 Folly Brook Blvd. Wethersfield, CT 6109				
4.					
5.					
6.					

Appendix F – FAA Determination

Federal Aviation Administration

« OE/AAA

Notice Criteria Tool

Notice Criteria Tool - Desk Reference Guide V_2018.2.0

The requirements for filing with the Federal Aviation Administration for proposed structures vary based on a number of factors: height, proximity to an airport, location, and frequencies emitted from the structure, etc. For more details, please reference CFR Title 14 Part 77.9.

You must file with the FAA at least 45 days prior to construction if:

- your structure will exceed 200ft above ground level
- your structure will be in proximity to an airport and will exceed the slope ratio
- your structure involves construction of a traverseway (i.e. highway, railroad, waterway etc...) and once adjusted upward with the appropriate vertical distance would exceed a standard of 77.9(a) or (b)
- your structure will emit frequencies, and does not meet the conditions of the FAA Co-location Policy
- your structure will be in an instrument approach area and might exceed part 77 Subpart C
- your proposed structure will be in proximity to a navigation facility and may impact the assurance of navigation signal reception
- your structure will be on an airport or heliport
- filing has been requested by the FAA

If you require additional information regarding the filing requirements for your structure, please identify and contact the appropriate FAA representative using the Air Traffic Areas of Responsibility map for Off Airport construction, or contact the FAA Airports Region / District Office for On Airport construction.

The tool below will assist in applying Part 77 Notice Criteria.

Latitude:	41 Deg 35 M 56.5 S N
Longitude:	72 Deg 43 M 05.4 S W
Horizontal Datum:	NAD83
Site Elevation (SE):	300 (nearest foot)
Structure Height :	50 (nearest foot)
Traverseway:	No Traverseway (Additional height is added to certain structures under 77.9(c)) User can increase the default height adjustment for Traverseway, Private Roadway and Waterway
Is structure on airport:	(•) No ( ) Yes

Results

You do not exceed Notice Criteria.