

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL Ten Franklin Square, New Britain, CT 06051

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VIA ELECTRONIC MAIL

January 9, 2023

Brian Smith VCP FX CT, LLC 150 Trumbull Street, 4th Floor Hartford, CT 06103 bsmith@verogy.com

RE:

PETITION NO. 1550 – VCP FX CT, LLC d/b/a Verogy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.5-megawatt AC roof-mounted solar photovoltaic electric generating facility located at the Fed Ex Distribution Center, 49 FedEx Drive, Middletown, Connecticut, and associated electrical interconnection.

Dear Brian Smith:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than January 31, 2023. Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the January 31, 2023 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman Executive Director

MB/IN

c: Service List dated November 21, 2022

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

Project Development

- 1. What is the estimated cost of the project?
- 2. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?
- 3. Referencing page 11 and Appendix D of the Petition, has the City of Middletown, the Town of Berlin, the Town of Cromwell, and/or any abutters provided comments to Verogy since the Petition filing? If so, please summarize the comments and how these comments were addressed.
- 4. Referencing page 4 of the Petition, the LREC contract is for a period of 15 years.
 - a. Can this contract be extended/renewed?
 - b. If there is no provision for extension or renewal, would the Petitioner decommission the facility at that time or seek other revenue mechanisms for the power produced by the facility?
- 5. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?

Proposed Site

- 6. In the lease agreement with the property owner are there any provisions within the lease related to decommissioning and/or site restoration at the end of the project's useful life? If so, please describe and/or provide any such provisions.
- 7. What is the height of the building roof above grade?
- 8. Provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar facility.

Energy Output

- 9. Would the power output of the solar panels decline as the panels age? If so, estimate the percent per year.
- 10. Would the Petitioner participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?

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

Site Components and Solar Equipment

- 12. Provide a side profile drawing to depict the solar panel angle with the horizontal, and the maximum and minimum heights of the arrays above the roofline.
- 13. What is the proposed equipment shown in yellow on Figure 3 of the Petition? Is it located on the ground? What are the dimensions?
- 14. To what depth would the proposed electrical conduit shown on Figure 3 of the Petition be buried?
- 15. Provide the dimensions of the transformer and inverter pads.

Interconnection

- 16. Is the project interconnection required to be reviewed by ISO-NE?
- 17. Referencing page 7 of the Petition, what is the status of the interconnection application with Eversource?

Public Safety

- 18. With regard to emergency response:
 - a. Would training be provided to local emergency responders in the event of a fire or other emergency occurs at the site?
 - b. How would site access be ensured for emergency responders? Would a shut-off switch be located a ground level?
- 19. If there is a structure fire or rooftop fire, what substances (water, foam, etc.) can be used on the solar array to extinguish the fire?
- 20. What structural standards and codes were applied to the design of the roof-mount solar panel racking system? What wind speed was used in the design calculations?

Environmental

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

- 22. Petition p. 3 lists residential use to the west of the site. Would the project be visible from these residential areas? Characterize any expected visibility.
- 23. Are there any national, state and/or locally-designated scenic roads near the proposed site? If yes, describe the visibility of the proposed project from these road(s).
- 24. Where is the nearest national, state and/or locally-designated historic area from the proposed site? Describe the visibility of the proposed project from the nearby historic area(s).
- 25. Provide a photo simulation of the proposed facility.

Facility Construction

- 26. Which code(s) govern stormwater drainage on roofs, e.g. Connecticut State Building Code, International Building Code, etc.? Would the rooftop drainage system remain in compliance with such code(s) post-construction, or would any upgrades to the roof's drainage system be necessary for compliance?
- 27. Would the proposed installation affect existing rooftop stormwater drainage? How is rooftop stormwater captured and where is it discharged?
- 28. Where would the construction staging area be located?
- 29. Although the ground equipment identified in Figure 3 is located outside of the designated flood zone, what is the cost to elevate the ground equipment an additional foot above mean sea level?

Maintenance/Decommissioning

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