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April 9, 2025

VIA FEDERAL EXPRESS

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

Re: Petition No. 1558 - Community Power Group LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4-megawatt AC solar photovoltaic electric generating facility located at 24 Middle Road, Ellington, Connecticut, and associated electrical interconnection

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council ("Council") are 24 Middle Solar 1 LLC's responses to the Council's development and management plan interrogatories dated April 2, 2025.

An original and fifteen (15) copies of this filing will be hand delivered to the Council.

Should you have any questions regarding this letter, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosure

cc: Petition No. 1558 Service List

Interrogatory CSC-1

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Q-CSC-1: Pursuant to Condition No. 1 of the Council's Declaratory Ruling, what is the status of the Department of Energy and Environmental Protection (DEEP) Stormwater Permit?

A-CSC-1: 24 Middle Solar 1 LLC ("24 Middle Solar") filed for DEEP Stormwater permit review on January 9, 2025. 24 Middle Solar understands from Christopher Stone in the Stormwater Section of DEEP that as of April 2, 2025 DEEP's review of the application file is complete, and pending 24 Middle Solar's posting of the required letters of credit the project will be approved. 24 Middle Solar is working to establish the required letters of credit and expects the process to be completed by April 11.

Interrogatory CSC-2

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Q-CSC-2: Referencing the D&M Plan site layout and solar array site configuration approved by the Council in the August 4, 2023 Declaratory Ruling;

- a) Why has the limit of disturbance increased from 28.4 acres to 29.1 acres?
- b) Is it necessary to revise the Stormwater Permit to account for the increase in the limit of disturbance?
- c) The fenced solar array increased in size from 20 acres to 24 acres even though the number of panels decreased by 1,643. In what areas did the increase occur and for what reasons?
- d) Why were the panel row aisles increased in width from 14 feet to 16.5 feet?
- e) Why are the Project inverters in one central location at the edge of the facility instead of dispersed throughout the site as initially proposed?
- f) Can the inverter bank be placed in central portion of the facility or in a location farther from abutting property lines?
- g) What is the distance between the inverter bank and the nearest property line?

A-CSC-2:

- a) The limit of disturbance was increased in order to include an additional site entrance off of Pinney Street, the interconnection poles off of Pinney Street, as well as additional rows of panels in the northeast corner of the site to accommodate the switch from the Jinko 600W modules to the Canadian Solar 700/705W modules.
- b) No revision of the Stormwater Permit will be necessary because CPG's Stormwater Permit filing included the increased limit of disturbance of 29.1 acres.
- c) The fenced area of the solar array was increased in order to provide additional area for sheep grazing as well as to accommodate additional panel strings to be placed in the northwest corner of the solar array, which was necessary to accommodate the updated panel selection from an electrical design perspective and appropriate panel stringing.
- d) The panel row aisles increased from 14 feet to 16.5 feet in order to provide greater sheep grazing area between the panel rows. In addition, the greater panel spacing increases the production of the

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solar facility while maintaining generally the same facility footprint with the exception of additional area added in the northwest corner.

- e) The solar inverters were moved to one central location because 24 Middle Solar has found this to be a best practice from a fire protection standpoint. Having the inverters in one location allows the Fire Department the easiest pathway of access without having to locate specific inverters out in the solar field. Moving the inverters to the periphery of the solar field also increases available area for sheep grazing, and reduces the amount of equipment and above-ground conduit that the sheep grazer has to avoid when establishing their temporary electric fences within the solar field.
- f) The inverter bank cannot be moved to a more central portion of the facility because this would move the inverter bank farther way from the site entrance and access road which is not a best practice from a fire protection standpoint. In addition, placing the inverters outside of the central portion of the facility creates more area available for sheep grazing, and reduces potential challenges for the sheep grazer in establishing their temporary electric fence to corral sheep.
- g) The inverter bank is approximately 203 feet from the nearest property line.

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- Q-CSC-3: Referencing D&M Plan Attachment C, Canadian Solar TOPBiHiKu7 700/705 watt solar photovoltaic modules are specified for the facility instead of the Jinko 600 watt modules initially proposed. Submit documentation Toxicity Characteristic Leaching Procedure (TCLP) test results indicating the solar panels will not be characterized as hazardous waste.
- A-CSC-3: Please see Exhibit CSC-3-1 for the Toxicity Characteristic Leaching Procedure test results which confirm the panels will not be characterized as hazardous waste.

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Q-CSC-4: Referencing D&M Attachment D Noise Analysis,

- a) Why were nearby residential homes listed as Receptors instead of the abutting property lines, in accordance with state noise standards?
- b) What do the Receptor distances in the table on pp. 5-6 represent?
- c) Why were the tracker system motors excluded from the noise analysis?
- d) Would the tracker motors closest to the inverter bank and transformers contribute to overall noise levels?
- e) Why is the sound analysis referred to as Post Construction Noise Analysis?
- f) Would rotating the inverter bank reduce noise levels at the nearest property line?

A-CSC-4:

- a) 24 Middle Solar selected residential homes to serve as Receptors to confirm that the expected noise levels that would actually reach nearby homes would be within DEEP Noise Standard Daytime limits. The calculated sound levels shown below at each Receptor were updated to consider the respective property line as the Receptor as opposed to the residential home. All calculated sound levels at the abutting property lines are within DEEP Noise Standard Daytime limits.

Receptor	DEEP Noise Standard Daytime, dBa	DEEP Noise Standard Nighttime, dBa	Distance to Inverter Bank, feet	Calculated Sound Level at Receptor, dBa	Distance to Transformer Bank, feet	Calculated Sound Level at Receptor, dBa
R1	55	45	210	43.9	431	22.6
R2	55	45	203	44.2	375	23.8
R3	55	45	311	40.5	393	23.4
R4	55	45	442	37.4	397	23.3
R5	55	45	468	36.9	275	26.5
R6	55	45	742	32.9	421	22.8

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- b) The Receptor distances represent the distance between the nearest Receptor, which was previously set as the respective residential homes and is now set as the nearest adjacent property boundary, and the respective transformer and inverter banks. The table has been updated to the correct relevant distances between the abutting property lines of the selected homes to serve as "Receptors" and the respective transformer and inverter banks.
- c) The tracker system motors were excluded from the noise analysis because they emit noise very intermittently throughout the day. The tracker motors emit noise for approximately seven seconds while active, and the noise will be shielded from surrounding properties by the panels.
- d) The tracker motors closest to the inverter bank and transformers will not contribute to overall noise levels. These motors will operate very intermittently throughout the day, and the noise emitted from the motors will be shielded from traveling beyond the solar facility by the panels themselves.
- e) The sound analysis is referred to as a Post Construction Noise Analysis in order to be consistent with Condition 2.f. of the Decision and Order. 24 Middle Solar has modeled the anticipated noise that will be emitted post construction from the project - although that modelling should be considered a pre-construction noise analysis.
- f) 24 Middle Solar does not anticipate that rotating the inverter bank would reduce noise levels, as it will not alter the concentration of the noise in the same area. However, 24 Middle Solar has corrected the solid fencing specified in the plans so that the north, east, and south boundaries of the inverter bank are enclosed to reduce noise impact.

Interrogatory CSC-5

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Q-CSC-5: Referencing D&M Site Plan SP-2, what is the purpose of having a solid barrier on the south and west sides of the inverter bank?

A-CSC-5: The solid barrier fence has been adjusted in the updated plan set attached to this filing under Exhibit CSC-5-1. The inclusion of the fence on the west side of the inverter bank was an error. 24 Middle Solar did intend to include the solid fence on the south side of the solar facility in order to reduce noise potential for the property to the southeast of the inverter bank area, 204 Pinney Street.

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- Q-CSC-6: Revise D&M Site Plan EC-series to include the installation of straw bales or other generally accepted similar control measures to reinforce silt fencing adjacent to wetland areas, in accordance with Council Declaratory Ruling Condition 2b.
- A-CSC-6: Please see updated plan set attached to this filing as Exhibit CSC-5-1 with the request note update regarding

Interrogatory CSC-7

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Q-CSC-7: Referencing D&M Site Plan DN-1, what is the height of landscaping at the time of planting?

A-CSC-7: The white spruce trees at the time of planting will be between six and eight feet.

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Q-CSC-8: Where will the facility contact signs and sheep grazer contact signs be placed?

A-CSC-8: Facility Contact and Sheep Grazer Contact signs will be placed next to the site entrance gate off of Middle Road.

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Q-CSC-9: Referencing Council Declaratory Ruling Condition 2i, submit a fully-executed and signed Hold Harmless Agreement.

A-CSC-9: Please see the executed Hold Harmless Agreement. Exhibit CSC-9-1.

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Q-CSC-10: Referencing D&M Plan p. 1, when will CPG notify the Council of the transfer of Project ownership to 24 Middle Solar 1 LLC?

A-CSC-10: CPG is submitting a letter with this response as Exhibit CSC-10-1 notifying the Council of the transfer of the project to a special project entity 24 Middle Solar 1 LLC wholly owned by CPG.

Interrogatory CSC-11

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Q-CSC-11: Referencing D&M Plan p. 2 and Site Plan SP-series, interconnection route;

- a) What is the reason the interconnection line from the transformers extends overhead instead of underground to the 5-pole interconnection area off Pinney Street?
- b) What equipment will be on each of the 5 interconnection poles off Pinney Street?
- c) Why is an additional pole required on the east side of Pinney Street if there are two existing poles in close proximity?
- d) Estimate the amount of tree clearing and grubbing necessary to construct the entire overhead interconnection and interconnection access drive. Submit a drawing that depicts clearing limits.
- e) Describe the visibility of the interconnection area from Pinney Street and the residence/farm east of the interconnection access drive.
- f) Has CPG consulted with Eversource regarding the possible installation of underground lines and pad-mounted equipment on the customer side of the electric distribution interconnection, or other interconnection design(s), to further reduce visibility to the extent feasible?
- g) Is 195 Pinney Street a separate parcel or just an Eversource location reference on the 24 Middle Road parcel?
- h) Does the owner of the host parcel (24 Middle Road) currently own the parcel at 200 Pinney Street?

A-CSC-11:

- a) The interconnection line is planned to be overhead from the transformers to the interconnection area off Pinney Street in order to have the least amount of environmental impact to the site. The interconnection cable needs to cross near a stream buffer and within an existing wooded area, as well as cross the proposed stormwater features, and having an overhead line greatly reduces the disturbance of these areas during construction and future operation.
- b) The five poles that are part of the Eversource interconnection include, starting from the circuit, 1) the Existing Pole #1209 which will serve as the Point of Interconnection, 2) an empty pole reserved for

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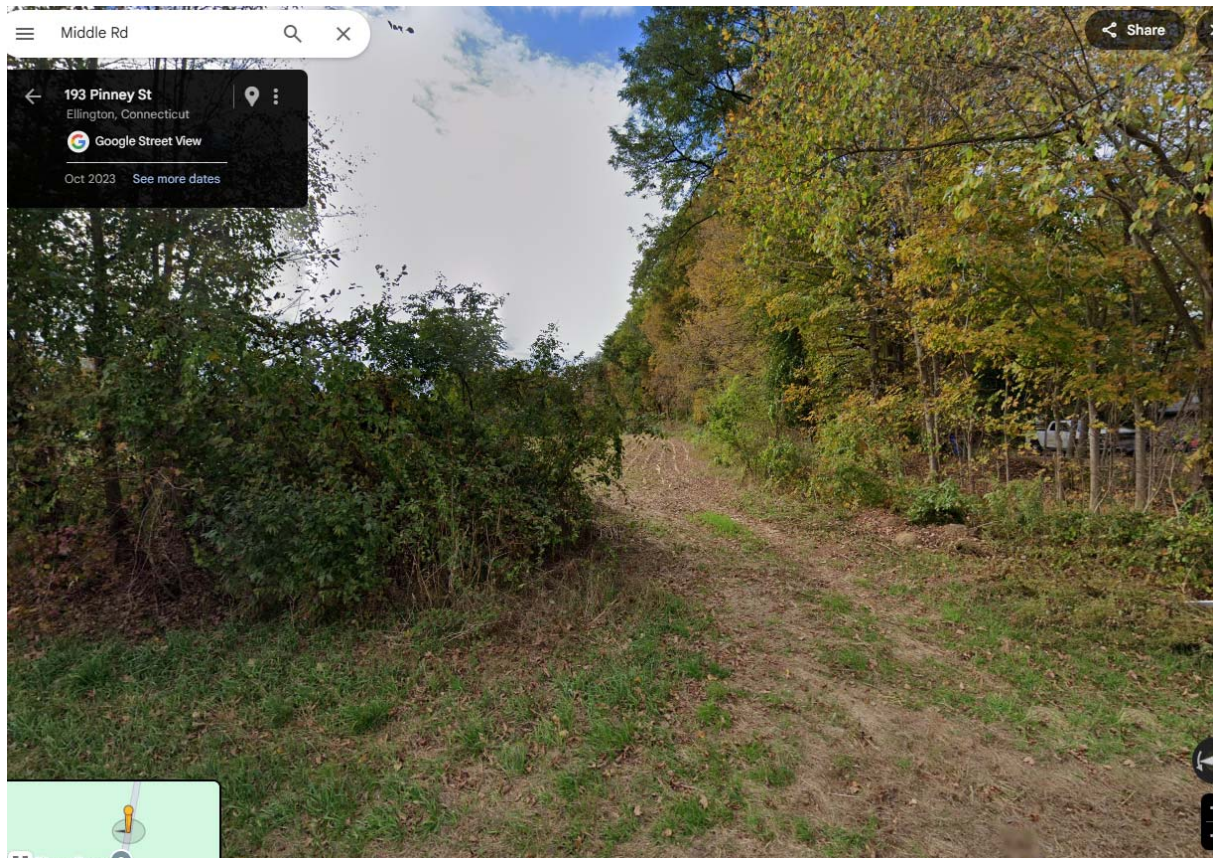
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- future transfer trip design, 3) a 600A utility disconnect switch, 4) a 15V pole-mounted recloser, and 5) a utility meter.
- c) The point of interconnection for the 24 Middle Solar Facility will be existing Eversource Pole #1209 which will be replaced as part of project construction by Eversource.
 - d) Please see the attached tree clearing and landscape plan as Exhibit CSC-11-1 showing the proposed 0.12 acres of tree clearing. An additional 0.06 acres of trimming only may take place as necessary for the interconnection poles near the road entrance off of Pinney Street.
 - e) There is existing vegetation along Pinney Street as shown in the screenshot below which will be maintained as much as possible to limit visibility of the interconnection area by surrounding homes, including the residence and farm east of the property. In addition, two evergreen trees will be added on either side of the site entrance to further limit visibility. Only when standing directly in front of the site entrance will the interconnection poles will be visible.

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- f) 24 Middle Solar has discussed the possibility of underground lines on the customer-side of the electric distribution interconnection and determined it is not feasible due to the reasons previously discussed regarding reducing environmental impact on site.
- g) 195 Pinney Street is a part of same subject parcel as 24 Middle Road, as shown on the A2 Survey conducted by Northeast Survey Consultants and included in the plan set in Exhibit CSC-5-1. 195 Pinney Street is an Eversource location reference to the point of interconnection for the 24 Middle Road parcel.
- h) Yes, PHRUMB Properties, LLC who owns the project host parcel also owns the parcel at 200 Pinney Street.