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 Community Power Group LLC's ("CPG" or the "Company") responses to the Council's second set of interrogatories dated April 6, 2023.

An original and fifteen (15) copies of this filing will be mailed via first-class mail to the Council.

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

Very truly yours,


Bruce L. McDermott

## Enclosures

Interrogatory CSC-47
Community Power Group, LLC
Witness: Michael Borkowski
Petition No. 1558
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Q-CSC-47: Provide a one-line diagram of the interconnection facilities identifying both overhead and underground equipment.

A-CSC-47: Please see Exhibit CSC-47-1.

Community Power Group, LLC
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Witness: Michael Borkowski
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Q-CSC-48: Referring to Interrogatory Response 20, have there been any discussions with Eversource to use pad-mounted equipment rather than pole-mounted equipment?

A-CSC-48: The project was studied by Eversource with its interconnection scheme that calls for pole mounted equipment. To explore a pad mounted interconnection would require Community Power Group to conduct a new system study and interconnection design. Community Power Group has not commissioned Eversource to restudy the project to use pad-mounted equipment.

Interrogatory CSC-49
Community Power Group, LLC
Witness: Michael Borkowski
Petition No. 1558

Q-CSC-49: Provide cost estimates for both an overhead and underground interconnection.

A-CSC-49: Community Power Group is not able to provide a cost estimate for an underground interconnection as Eversource conducts those studies and it chose to study it using its standard overhead interconnection. Please see Exhibit CSC-49-1 for the cost estimate provided by Eversource for the overhead connection that was approved.

Community Power Group, LLC
Witness: Michael Borkowski
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Q-CSC-50: Is it possible to relocate the overhead interconnection to the property frontage on Pinney Street?

A-CSC-50: Moving the point of interconnection to the Pinney Street frontage would limit the agricultural uses of the field on the east side of the property. Additionally, running the medium voltage line from the project area to Pinney Street would involve some tree and brush clearing of the area between the two plowed fields. Lastly, moving the point of interconnection to the Pinney Street frontage would require Community Power Group to start a new interconnection study process which is extremely costly and would take more than a year to complete.

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Q-CSC-51: Referring to Interrogatory Response 25, what would be the collective noise level from the two transformers at the nearest property line?

A-CSC-51: The nearest property line to the transformers is approximately 249.6 feet away from the solar facility fence. Two identical sounds next to each result in double the intensity of the sound, that is an additional 3 decibels to the measured noise of the transformer of 65 dBa at 1 meter away. Based on the law of sound attenuation, the resulting sound of two transformers next to each other at the nearest property line would be 30.4 decibels, which is less than the applicable maximum noise limits listed in the Regulations of Connecticut State Agencies and it is the equivalent of a quiet rural area.

Community Power Group, LLC
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Q-CSC-52: What type of media and/or specialized equipment would be necessary to extinguish a solar panel/electrical component fire?

A-CSC-52: No specialized equipment is necessary to extinguish a solar panel/electrical component fire. The disconnect switches for the facility will be clearly labeled for emergency personnel to be able to locate it quickly in the event of a fire which is the first step. Using water in a fog pattern is the most common practice to extinguish a solar facility fire.

Q-CSC-53: Would CPG be required to file a Federal Aviation Administration Form 7460 if a small crane, excavator, or other tall equipment is used at site during construction?

A-CSC-53: Construction notices are required to be provided to the FAA under the following conditions:

Any construction or alteration that exceeds an imaginary surface extending outward and upward at any of the following slopes:
(1) 100 to 1 for a horizontal distance of $20,000 \mathrm{ft}$. from the nearest point of the nearest runway of each airport with its longest runway more than $3,200 \mathrm{ft}$. in actual length, excluding heliports.
(2) 50 to 1 for a horizontal distance of $10,000 \mathrm{ft}$. from the nearest point of the nearest runway of each airport with its longest runway no more than $3,200 \mathrm{ft}$. in actual length, excluding heliports.
(3) 25 to 1 for a horizontal distance of $5,000 \mathrm{ft}$. from the nearest point of the nearest landing and takeoff area of each heliport.

Though these conditions do not apply to this project, Community Power Group agrees with the Connecticut Aviation Administration that it is best practice to do so, and has completed a filing for a small crane and excavator. Community Power Group is currently waiting on results of the Form 7460 review by the Federal Aviation Administration.

Community Power Group, LLC
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Q-CSC-54: Identify the distance/direction of the nearest federally-obligated airport from the proposed site.

A-CSC-54: The closest federally-obligated airport is Bradley International Airport which is located approximately 10.17 miles west/northwest of the facility.

Q-CSC-55: Identify the distance/direction of the Ellington Airport and Skylark Airport from the proposed site.

A-CSC-55: Ellington Airport is 2.43 miles northeast directly from the proposed project site and Skylark Airport is approximately 5.05 miles northwest directly from the proposed facility.

Q-CSC-56: Provide an aviation glare analysis.

A-CSC-56: Please see Exhibit CSC-56-1 which consists of flight path glare simulations for Skylark Airport and Ellington Airport that was run after a consultation with the Connecticut Airport Authority, Skylark Airport, and Ellington Airport. No glare was predicted.


## LaBella

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Rochester. NY 14614

| Rochester, NY |
| :--- |
| $585-454-6110$ |

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## 

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WASHINGTON DC 20015

LINETYPE LEGEND:
GENERAL NOTES:
Min Min

ELECTRIC KEY NOTES:













(13)


## Appendix G

Attachment 1

## EDC's Description of its Upgrades and Best Estimate of Upgrade Costs

| Item | Description | Cost | Notes No. |
| :--- | :--- | :--- | :--- |
| 1. | New Service and recloser | $\$ 199,041$ |  |
| 2. | Subtotal | $\$ 199,041$ |  |
| 3. | CIAC - 11\%, (Contribution in Aid of Construction) | $\$ 21,895$ |  |
| 4. | Subtotal with CIAC | $\$ 220,936$ |  |
| 5. | Witness Test | $\$ 2,000$ |  |
| 6. | Total Construction cost <br> Note: Additional escalation cost of $4 \%$ will apply per year for payment after <br> 2022 | $\$ 222,936$ |  |

## TABLE 1

## General comments:

1. Line work may require consent from property owners in compliance with CT Statute. The proposed schedule of milestones as outlined in appendix F of the IA assumes that such approval will be secured with no opposition and does not include any delays or legal fees associated with securing such approval.
2. In the event that you are unable to meet the schedule of milestones in appendix F of the IA a revised schedule of milestones will be re-submitted to you. It is important to note that a slip in schedule may not result in an equal delay (one to one delay). Schedules are based on availability of man power, resources and the ability to schedule outages which can be curtailed during the summer season.
3. Price is based on Impact study with an accuracy of $+/-25 \%$ (If a Facility Study was performed delete this note)
4. Escalation cost of $4 \%$ will apply per year for payment after 2022.

## Agreed to by:



Eversource Energy $\qquad$ Date: $\qquad$

## FORGESOLAR GLARE ANALYSIS

## Project: Ellington Solar Farm

Site configuration: $\mathbf{2 4}$ Middle - 4MW SAT-temp-0

Created 04 Nov, 2022
Updated 10 Apr, 2023
Time-step 1 minute
Timezone offset UTC-5
Site ID 78755.13960
Category 1 MW to 5 MW
DNI peaks at $1,000.0 \mathrm{~W} / \mathrm{m}^{\wedge} 2$
Ocular transmission coefficient 0.5
Pupil diameter 0.002 m
Eye focal length 0.017 m
Sun subtended angle 9.3 mrad
PV analysis methodology V2


Summary of Results No glare predicted

| PV Array | Tilt | Orient | Annual Green Glare |  | Annual Yellow Glare |  | Energy <br> kWh |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | min | hr | min | hr |  |
| PV array 1 | SA tracking | SA tracking | 0 | 0.0 | 0 | 0.0 | 12,210,000.0 |

Total annual glare received by each receptor; may include duplicate times of glare from multiple reflective surfaces.

| Receptor | Annual Green Glare |  | Annual Yellow Glare |  |
| :--- | :---: | :---: | :---: | :---: |
|  | min | $\mathbf{h r}$ | min | hr |
| Abbott Road | 0 | 0.0 | 0 | 0.0 |
| Middle Road | 0 | 0.0 | 0 | 0.0 |
| Pinney Street | 0 | 0.0 | 0 | 0.0 |
| FP 1- Skylark | 0 | 0.0 | 0 | 0.0 |
| FP 2-Skylark 2 | 0 | 0.0 | 0 | 0.0 |
| FP 3-Ellington | 0 | 0.0 | 0 | 0.0 |
| FP 4-Ellington 2 | 0 | 0.0 | 0 | 0.0 |

## Component Data

## PV Arrays

Name: PV array 1
Axis tracking: Single-axis rotation
Backtracking: None
Tracking axis orientation: $180.0^{\circ}$
Tracking axis tilt: $0.0^{\circ}$
Tracking axis panel offset: $0.0^{\circ}$
Max tracking angle: $60.0^{\circ}$
Rated power: 4000.0 kW
Panel material: Smooth glass with AR coating
Reflectivity: Vary with sun
Slope error: correlate with material


| Vertex | Latitude ( ${ }^{\circ}$ ) | Longitude ( ${ }^{\circ}$ ) | Ground elevation (ft) | Height above ground (ft) | Total elevation (ft) |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 41.890839 | -72.488840 | 273.63 | 12.00 | 285.63 |
| 2 | 41.891949 | -72.489044 | 258.53 | 12.00 | 270.53 |
| 3 | 41.892141 | -72.487456 | 266.85 | 12.00 | 278.85 |
| 4 | 41.893155 | -72.487627 | 279.20 | 12.00 | 291.20 |
| 5 | 41.893699 | -72.484098 | 254.73 | 12.00 | 266.73 |
| 6 | 41.893387 | -72.484044 | 252.30 | 12.00 | 264.30 |
| 7 | 41.893443 | -72.483776 | 250.60 | 12.00 | 262.60 |
| 8 | 41.891542 | -72.483314 | 250.19 | 12.00 | 262.19 |

## Route Receptors

| Name: Abbott Road <br> Path type: Two-way <br> Observer view angle: $50.0^{\circ}$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Vertex | Latitude ( ${ }^{\circ}$ ) | Longitude ( ${ }^{\circ}$ ) | Ground elevation (ft) | Height above ground (ft) | Total elevation (ft) |
| 1 | 41.888523 | -72.499219 | 272.64 | 4.00 | 276.64 |
| 2 | 41.892460 | -72.499252 | 253.03 | 4.00 | 257.03 |
| 3 | 41.895535 | -72.499327 | 255.23 | 4.00 | 259.23 |


| Name: Middle Road <br> Path type: Two-way <br> Observer view angle: $50.0^{\circ}$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Vertex | Latitude ( ${ }^{\circ}$ ) | Longitude ( ${ }^{\circ}$ ) | Ground elevation (ft) | Height above ground (ft) | Total elevation (ft) |
| 1 | 41.892485 | -72.499118 | 253.53 | 4.00 | 257.53 |
| 2 | 41.895368 | -72.481539 | 282.72 | 4.00 | 286.72 |
| 3 | 41.895587 | -72.480981 | 280.15 | 4.00 | 284.15 |
| 4 | 41.896306 | -72.479827 | 257.50 | 4.00 | 261.50 |
| 5 | 41.896554 | -72.479511 | 253.20 | 4.00 | 257.20 |

Name: Pinney Street
Path type: Two-way
Observer view angle: $50.0^{\circ}$


| Vertex | Latitude $\left({ }^{\circ}\right)$ | Longitude $\left({ }^{\circ}\right)$ | Ground elevation (ft) | Height above ground (ft) | Total elevation (ft) |
| :--- | :---: | :---: | :---: | :---: | :---: |
| 1 | 41.897887 | -72.479152 | 250.14 | 4.00 | 254.14 |
| 2 | 41.887345 | -72.481834 | 234.65 | 4.00 | 238.65 |

## Flight Path Receptors



Name: FP 2-Skylark 2
Description:
Threshold height: 50 ft
Direction: $267.8^{\circ}$
Glide slope: $3.0^{\circ}$
Pilot view restricted? Yes
Vertical view: $30.0^{\circ}$
Azimuthal view: $50.0^{\circ}$


| Point | Latitude $\left({ }^{\circ}\right)$ | Longitude $\left({ }^{\circ}\right)$ | Ground elevation (ft) | Height above ground (ft) | Total elevation (ft) |
| :--- | :---: | :---: | :---: | :---: | :---: |
| Threshold | 41.928659 | -72.570464 | 120.28 | 50.00 | 170.28 |
| Two-mile | 41.929789 | -72.531586 | 156.50 | 567.22 | 723.71 |

Name: FP 3-Ellington
Description:
Threshold height: 50 ft
Direction: $176.8^{\circ}$
Glide slope: $3.0^{\circ}$
Pilot view restricted? Yes
Vertical view: $30.0^{\circ}$
Azimuthal view: $50.0^{\circ}$


| Point | Latitude $\left({ }^{\circ}\right)$ | Longitude $\left({ }^{\circ}\right)$ | Ground elevation (ft) | Height above ground (ft) | Total elevation (ft) |
| :--- | :--- | :--- | :---: | :---: | :---: |
| Threshold | 41.927743 | -72.457353 | 250.53 | 50.00 | 300.53 |
| Two-mile | 41.956610 | -72.459545 | 302.64 | 551.32 | 853.96 |

Name: FP 4-Ellington 2
Description:
Threshold height: 50 ft
Direction: $353.6^{\circ}$
Glide slope: $3.0^{\circ}$
Pilot view restricted? Yes
Vertical view: $30.0^{\circ}$
Azimuthal view: $50.0^{\circ}$


| Point | Latitude $\left({ }^{\circ}\right)$ | Longitude $\left({ }^{\circ}\right)$ | Ground elevation (ft) | Height above ground (ft) | Total elevation (ft) |
| :--- | :---: | :---: | :---: | :---: | :---: |
| Threshold | 41.922906 | -72.456838 | 252.06 | 50.00 | 302.06 |
| Two-mile | 41.894170 | -72.452535 | 457.02 | 398.47 | 855.49 |

## Glare Analysis Results

Summary of Results No glare predicted

| PV Array | Tilt | Orient | Annual Green Glare |  | Annual Yellow Glare |  | Energy |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $\circ$ | $\circ$ | $\boldsymbol{m i n}$ | $\mathbf{h r}$ | $\boldsymbol{m i n}$ | $\mathbf{h r}$ | $\mathbf{k W h}$ |
| PV array 1 | SA | SA | 0 | 0.0 | 0 | 0.0 | $12,210,000.0$ |
|  | tracking | tracking |  |  |  |  |  |

Total annual glare received by each receptor; may include duplicate times of glare from multiple reflective surfaces.

| Receptor | Annual Green Glare |  | Annual Yellow Glare |  |
| :--- | :---: | :---: | :---: | :---: |
|  | min | $\mathbf{h r}$ | $\min$ | $\mathbf{h r}$ |
| Abbott Road | 0 | 0.0 | 0 | 0.0 |
| Middle Road | 0 | 0.0 | 0 | 0.0 |
| Pinney Street | 0 | 0.0 | 0 | 0.0 |
| FP 1-Skylark | 0 | 0.0 | 0 | 0.0 |
| FP 2-Skylark 2 | 0 | 0.0 | 0 | 0.0 |
| FP 3-Ellington | 0 | 0.0 | 0 | 0.0 |
| FP 4-Ellington 2 | 0 | 0.0 | 0 | 0.0 |

## PV: PV array 1 no olare found

Receptor results ordered by category of glare

| Receptor | Annual Green Glare |  | Annual Yellow Glare |  |
| :--- | :---: | :---: | :---: | :---: |
|  | min | $\mathbf{h r}$ | min | hr |
| Abbott Road | 0 | 0.0 | 0 | 0.0 |
| Middle Road | 0 | 0.0 | 0 | 0.0 |
| Pinney Street | 0 | 0.0 | 0 | 0.0 |
| FP 1-Skylark | 0 | 0.0 | 0 | 0.0 |
| FP 2-Skylark 2 | 0 | 0.0 | 0 | 0.0 |
| FP 3-Ellington | 0 | 0.0 | 0 | 0.0 |
| FP 4-Ellington 2 | 0 | 0.0 | 0 | 0.0 |

## PV array 1 and Abbott Road

Receptor type: Route
No glare found

## PV array 1 and Middle Road

Receptor type: Route
No glare found

# PV array 1 and Pinney Street 

Receptor type: Route
No glare found

## PV array 1 and FP 1- Skylark

Receptor type: 2-mile Flight Path
No glare found

## PV array 1 and FP 3-Ellington

Receptor type: 2-mile Flight Path
No glare found

PV array 1 and FP 2-Skylark 2
Receptor type: 2-mile Flight Path
No glare found

PV array 1 and FP 4-Ellington

## 2

Receptor type: 2-mile Flight Path
No glare found

## Assumptions

"Green" glare is glare with low potential to cause an after-image (flash blindness) when observed prior to a typical blink response time. "Yellow" glare is glare with potential to cause an after-image (flash blindness) when observed prior to a typical blink response time. Times associated with glare are denoted in Standard time. For Daylight Savings, add one hour.
The algorithm does not rigorously represent the detailed geometry of a system; detailed features such as gaps between modules, variable height of the PV array, and support structures may impact actual glare results. However, we have validated our models against several systems, including a PV array causing glare to the air-traffic control tower at Manchester-Boston Regional Airport and several sites in Albuquerque, and the tool accurately predicted the occurrence and intensity of glare at different times and days of the year.
Several V1 calculations utilize the PV array centroid, rather than the actual glare spot location, due to algorithm limitations. This may affect results for large PV footprints. Additional analyses of array sub-sections can provide additional information on expected glare. This primarily affects V1 analyses of path receptors.
Random number computations are utilized by various steps of the annual hazard analysis algorithm. Predicted minutes of glare can vary between runs as a result. This limitation primarily affects analyses of Observation Point receptors, including ATCTs. Note that the SGHAT/ ForgeSolar methodology has always relied on an analytical, qualitative approach to accurately determine the overall hazard (i.e. green vs. yellow) of expected glare on an annual basis.
The analysis does not automatically consider obstacles (either man-made or natural) between the observation points and the prescribed solar installation that may obstruct observed glare, such as trees, hills, buildings, etc.
The subtended source angle (glare spot size) is constrained by the PV array footprint size. Partitioning large arrays into smaller sections will reduce the maximum potential subtended angle, potentially impacting results if actual glare spots are larger than the sub-array size. Additional analyses of the combined area of adjacent sub-arrays can provide more information on potential glare hazards. (See previous point on related limitations.)
The variable direct normal irradiance (DNI) feature (if selected) scales the user-prescribed peak DNI using a typical clear-day irradiance profile. This profile has a lower DNI in the mornings and evenings and a maximum at solar noon. The scaling uses a clear-day irradiance profile based on a normalized time relative to sunrise, solar noon, and sunset, which are prescribed by a sun-position algorithm and the latitude and longitude obtained from Google maps. The actual DNI on any given day can be affected by cloud cover, atmospheric attenuation, and other environmental factors.
The ocular hazard predicted by the tool depends on a number of environmental, optical, and human factors, which can be uncertain. We provide input fields and typical ranges of values for these factors so that the user can vary these parameters to see if they have an impact on the results. The speed of SGHAT allows expedited sensitivity and parametric analyses.
The system output calculation is a DNI-based approximation that assumes clear, sunny skies year-round. It should not be used in place of more rigorous modeling methods.
Hazard zone boundaries shown in the Glare Hazard plot are an approximation and visual aid based on aggregated research data. Actual ocular impact outcomes encompass a continuous, not discrete, spectrum.
Glare locations displayed on receptor plots are approximate. Actual glare-spot locations may differ.
Refer to the Help page at www.forgesolar.com/help/ for assumptions and limitations not listed here.

Default glare analysis parameters and observer eye characteristics (for reference only):

- Analysis time interval: 1 minute
- Ocular transmission coefficient: 0.5
- Pupil diameter: 0.002 meters
- Eye focal length: 0.017 meters
- Sun subtended angle: 9.3 milliradians

