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July 18, 2023

Via Hand Delivery

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

Re: **East Windsor Solar Two, LLC and VCP, LLC d/b/a Verogy – 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 4.0 MWAC Ground-Mounted Solar Photovoltaic Project at 31 Thrall Road, East Windsor, Connecticut**

Pre-Hearing Interrogatory Responses

Dear Attorney Bachman:

On behalf of East Windsor Solar Two, LLC and VCP, LLC d/b/a Verogy (“Petitioner”), enclosed please find the original and fifteen (15) copies of the Petitioner’s Responses to the Council Pre-Hearing Interrogatories for Petition No. 1572. Electronic copies of these responses have also been sent to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kenneth C. Baldwin

KCB/kia
Enclosure

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
 :
 A PETITION FOR A DECLARATORY RULING : PETITION NO. 1572
 THAT A CERTIFICATE OF ENVIRONMENTAL :
 COMPATIBILITY AND PUBLIC NEED IS NOT :
 REQUIRED FOR THE CONSTRUCTION, :
 OPERATION AND MAINTENANCE OF A 4.0 :
 MW AC SOLAR PHOTOVOLTAIC PROJECT AT :
 31 THRALL ROAD, EAST WINDSOR, :
 CONNECTICUT : JULY 18, 2023

**RESPONSES OF EAST WINDSOR SOLAR TWO, LLC AND VCP, LLC
D/B/A VEROGY TO CONNECTICUT SITING COUNCIL INTERROGATORIES**

On June 27, 2023, the Connecticut Siting Council (“Council”) issued Interrogatories to East Windsor Solar Two, LLC and VCP, LLC d/b/a Verogy (“Petitioner”), relating to Petition No. 1572. Below are Petitioner’s responses.

Project Development

Question No. 1

Has East Windsor Solar Two, LLC (EWST) received any comments since the petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.

Response

The Petitioner has not received any comments directly from Town officials since the Petition was submitted on May 5, 2023. The Petitioner did receive copies of comments filed with the Council from East Windsor’s Planning and Zoning Commission and the Town of East Windsor, through its request for Party Status. The Petitioner also received copies of several emails and other correspondence received by the Council from various East Windsor residents,

none of which own land adjacent to the Project Site.

Question No. 2

Petition p. 13 states that EWST met with Town officials during the summer of 2021 with an update on April 7, 2023. Were there any subsequent meetings? If yes, when? What topics were discussed at such subsequent meeting(s)?

Response

Verogy has not had any meetings with Town officials since April 7, 2023.

Question No. 3

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

Response

The following permits will be required for construction and operation of the East Windsor Solar Two facility. The Petitioner will obtain and hold the permits in its name.

- a. Connecticut Department of Energy and Environmental Protection, General Permit for the Discharge of Stormwater and Dewatering Wastewater from Construction Activity.
- b. Town of East Windsor, Building Permit.
- c. Town of East Windsor, Electrical Permit.

Question No. 4

What is the estimated cost of the Project?

Response

The estimated cost of the Project is \$8,900,000.

Question No. 5

If the facility operates beyond the terms of the SCEF Agreement, will Petitioner decommission the facility or seek other revenue mechanisms for the power produced by the facility?

Response

The Petitioner may continue to operate the Facility beyond the term of the SCEF agreement if another revenue mechanisms for power supply is available at that time.

Question No. 6

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?

Response

No.

Question No. 7

Referencing the Council's record of Petition 1426, if a Declaratory Ruling is issued for the proposed facility, does EWST plan to construct, or partially construct, the facility and transfer it to another entity?

Response

The Petitioner has no current plans to transfer this project to any other entity.

Question No. 8

If EWST transfers the facility to another entity, would EWST provide the Council with a written agreement as to the entity responsible for any outstanding conditions of the Declaratory Ruling and quarterly assessment charges under CGS §16-50v(b)(2) that may be associated with this facility, including contact information for the individual acting on behalf of the transferee?

Response

If the Petitioner were to transfer the Project, it would do so subject to a requirement that the transferee comply with all regulatory permits and approvals.

Proposed Site

Question No. 9

Submit a map clearly depicting the boundaries of the solar facility site and the boundaries of the host parcel(s). Under Regulations of Connecticut State Agencies (RCSA) §16-50j-2a(29), “Site” means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located.

Response

The Petitioner directs Council staff to Appendix B (Project Plans) Sheet OP-1 of the Petition for a clear depiction of the “Site” which includes the area within the Limits of Disturbance (LOD) line shown. This area includes a specified boundary, access to the solar facility and electrical interconnection easement locations.

Question No. 10

Referencing p. 3 of the petition, “There are existing structures located in the southwest corner of the Site... consisting of an unoccupied house, several barns and a shed.” Are these features located on the facility site, as that term is defined under RCSA, or outside of the facility site?

Response

No, as referenced above, the existing structures in the southwest corner of the host parcel are not within the limits of the proposed “Site”. As depicted on Plan Sheet OP-1, these structures are outside the limits of disturbance associated with the project.

Question No. 11

Is the site, or any portion of the host parcel, part of the Public Act 490 Program? If so,

how does the municipal land use code classify the parcel(s)? How would the facility affect the use classification?

Response

No. According to information available from the Town Assessors, no portion of the Site or the Host Parcel is included in the State's Act 490 program.

Question No. 12

Has the State of Connecticut Department of Agriculture (DOAg) purchased any development rights for the facility site or any portion of the facility site as part of the State Program for the Preservation of Agricultural Land?

Response

No.

Question No. 13

Referencing Appendix J, under "Alternatives to Locating the Energy Project on Prime Farmland," it states the property owner will retain land development rights to develop a cemetery in the future. What site restoration measures would be required at the end of the facility's useful life to facilitate the property owner's future intended use?

Response

In accordance with the Decommissioning and Restoration Plan included in Appendix E of the Petition, the Petitioner has committed to restore the Site to its pre-development condition thereby permitting future use of the parcel by the owner.

Question No. 14

Referencing the property owner's future intended use of the site as a cemetery, if the facility is approved, how would recent legislation to furnish a decommissioning bond and engage

a qualified soil scientist to assess and assure the restoration and suitability of prime farmland apply to this site?

Response

It is the Petitioner's position that the provision of Public Act (P.A.) 23-163, relating to decommissioning bond and site restoration requirement, do not apply to the EWST project. As the Council is aware, the EWST project seeks the approval of a Petition for Declaratory Ruling, asking the Council to find that a Certificate of Environmental Compatibility and Public Need (Certificate) is not required for the installation of the EWST facility. The new legislation imposes the site decommissioning and restoration bond requirements only to those projects requiring the issuance of a "Certificate". Second, the effective date set for P.A. 23-163 is June 29, 2023. The Petition was filed with the Council on May 5, 2023. There is no language in P.A. 23-163 that suggests the decommissioning requirements are to be applied retroactively. Since the Petition predates the effective date of the legislation, the provisions of P.A. 23-163 don't apply to the EWST project. Even if it was determined that the provisions of P.A. 23-163 did apply to the EWST project, evaluation and restoration of the Site for agricultural purposes is not necessary since the owner's intended future use of the Site is for a cemetery.

Question No. 15

Provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar field perimeter fence.

Response

The nearest property line to the solar field perimeter fence is approximately 42 feet to the west of the fence corner next to the facility access gate. The nearest off-site residence to the solar facility perimeter fence is located at 44 Thrall Road, approximately 150 feet to the southeast.

Energy Output

Question No. 16

Have electrical loss assumptions been factored into the output of the facility?

Response

Yes, electrical loss assumptions have been factored into the output calculation provided in the Petition.

Question No. 17

Is the project being designed to accommodate a potential future battery storage system? If so, please indicate the anticipated size of the system, where it may be located on the site, and the impact it may have on the SCEF Agreement.

Response

The Petitioner has no current no plans to incorporate a battery energy storage system (“BESS”) system on the project Site.

Question No. 18

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

Response

No, the Petitioner will not participate in the ISO-NE Forward Capacity Auction, as Eversource owns the capacity rights of any SCEF program facility. However, at the conclusion of the SCEF tariff the Petitioner may choose to participate in the ISO-NE Forward Capacity Auction.

Question No. 19

Would the power output of the solar panels decline as the panels age? If so, estimate the

percentage per year.

Response

Yes. The output of the solar panels would decline at an estimated rate of about 0.5% per year.

Question No. 20

If one section of the solar array experiences electrical problems causing the section to shut down, could other sections of the system still operate and transmit power to the grid? By what mechanism are sections electrically isolated from each other?

Response

Yes, only the DC panels or DC to AC inverters for the affected area would shut down. The remaining portion of the system would continue to operate and generate power. Sections of the solar facility are electrically isolated by grouping of DC panels to the DC to AC inverters, and the AC inverters are electrically isolated via breakers and disconnect switches.

Site Components and Solar Equipment

Question No. 21

Referencing Partial Site Plan OP-2, list the equipment that would be installed on each electrical pad.

Response

Each equipment pad will support the solar inverters, electric transformers, and the electrical switchgear.

Question No. 22

Is the wiring from the panels to the inverters installed on the racking? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation

maintenance, or chewing animals?

Response

The majority of the wiring will be run on the racking system itself. Where wiring is not run on the racking, it would run in conduit. All Facility wires are weatherproof and rated up to 194° F.

Question No. 23

Would the single axis tracker system move along the north-south axis? Submit a specification sheet of the tracking system.

Response

Yes, the tracking system would move along the north-south axis. The tracking system specification sheet is included in Attachment 1.

Interconnection

Question No. 24

Referencing page 8 and Partial Site Plan OP-2, what is the height of the utility poles above ground level after installation?

Response

All poles installed would be 40-45 feet tall above ground level.

Question No. 25

Referencing page 8 and Partial Site Plan OP-2, the proposed poles are a single utility recloser pole; junction pole; two utility primary meter poles; two customer disconnect switch poles; and two customer recloser poles. Identify each of these poles on Partial Site Plan OP-2. What equipment is mounted on each pole? Can the number of poles be reduced by consolidating equipment?

Response

Attachment 2 includes a revised Partial Site Plan OP-2, which identifies which equipment each utility pole contains. Because the EWST Facility has two separate SCEF contracts, the Petitioner is required by the Eversource and the SCEF program rules to maintain separate meters. This in turn necessitates the installation of separate disconnect switches and customer installed reclosers. Therefore, the equipment cannot be consolidated.

Question No. 26

Is the facility interconnection required to be reviewed by ISO-NE?

Response

Yes, the Project was required to be reviewed by ISO-NE as part of the interconnection application and system impact study process with Eversource and was approved by both ISO-NE and Eversource accordingly.

Question No. 27

Petition p. 12 states "... at least 60% of the total capacity of the facility will be supplied to low-and-moderate-income customers..." Where will the remaining approximately 40% be supplied?

Response

Pursuant to the SCEF Program Manual, half of the remaining 40% (20% of the total capacity) will be supplied to Small Business Customers through an EDC-administered identification and enrollment process. The remaining 20% of the total capacity will be available for voluntary enrollment by any eligible customer.

Question No. 28

What are the industry Best Management Practices for Electric and Magnetic Fields at

solar facilities?

Response

The Petitioner is not aware of any industry Best Management Practices for Electric and Magnetic Fields at solar facilities that connect to the existing distribution grid such as the EWST project.

Public Safety

Question No. 29

Would the project comply with the current Connecticut State Building Code and National Electrical Code?

Response

Yes.

Question No. 30

Would EWST be required to file a Federal Aviation Administration (FAA) Form 7460 for temporary equipment if a small crane, excavator, or other tall equipment is used at the site during construction?

Response

No. *See* the Notice Criteria Tool for a Temporary Crane included in Attachment 3.

Question No. 31

Identify the distance/direction of the nearest federally obligated airport from the proposed site. Is a glare analysis required to comply with FAA policy? Provide a hard copy of the FAA Notice Criteria Tool printout that is included in the electronic version of Appendix M of the Petition.

Response

Bradley International Airport, the nearest federally obligated airport, is located approximately 8.25 miles west-northwest of the Site. Based on the results of the FAA Notice Criteria Tool (also included Attachment 3), a glare analysis is not required to comply with FAA policy.

Question No. 32

In the event of a fire or emergency, describe procedures that will allow emergency responders to shut down the facility.

Response

In the event of a fire or emergency, emergency responders would be able to be shut down the facility via a physical on-site disconnect switch that will be appropriately labeled pursuant to the requirements of the National Electric Code. The Petitioner is prepared to provide assistance and/or training to local emergency responders, if needed.

Question No. 33

In the event of a brush or electrical fire, how are potential electric hazards that could be encountered by emergency response personnel mitigated? What type media and/or specialized equipment would be necessary to extinguish a solar panel/electrical component fire?

Response

In the event of a fire or emergency, the Facility will be able to be shut down by emergency responders via a physical disconnect switch that will be appropriately labeled pursuant to the requirements of the National Electric Code. The Petitioner is not aware of any specific media and/or specialized equipment that is needed to extinguish a fire within the Facility.

Question No. 34

Are there any private water wells on the site or in the vicinity of the site? If so, would the installation of racking posts affect well water quality from construction impacts, such as vibrations and sedimentation?

Response

According to the Connecticut Department of Public Health Public Water Supply Map, the host parcel and existing residential structures, as well as all of the adjacent parcels, are serviced by private drinking water wells. The Petitioner does not anticipate the need for any blasting to install the solar panel racking system. Therefore, there are no anticipated ground water impacts from Facility construction. Vibrations from installation of the racking system are not expected to cause sediment releases, and no disruption to well water flow or quality is anticipated. As a result, no special precautions are necessary.

Question No. 35

Referencing Petition Appendix L, would the results of the acoustical design study be impacted by cumulative noise from the transformers and the panel tracking system? Explain.

Response

The results of the acoustical design study would not be impacted by the cumulative noise from the transformers or the panel tracking system. The (32) CPS inverters at full load combine to generate a sound pressure level of 84 dBA (at one (1) foot) and represent the dominant source of sound from the site. The sound from the inverters is shown in the study to cause a negligible (i.e., imperceptible) change in sound levels at the nearest sensitive receptor locations. The additional minor sound sources (i.e., transformers and panel tracking motors), which generate sound pressure levels in the range of 52 – 61 dBA will be far less noticeable than the inverters.

Question No. 36

What noise-generating equipment would be installed at the site? Would operation of the proposed facility meet the applicable Department of Energy and Environmental Protection (DEEP) Noise Standards at the nearest property boundary?

Response

The noise-generating equipment on site is limited to the inverters, transformers, and motors for the panel tracking system. The loudest equipment being installed on site is the inverters, as the transformers and the motors generate dBA level of 61 and 52 respectively at 3 feet. The transformers and motors are compliant with RCOSA Section 22a-69. Yes, the Project would meet the applicable standards of RCOSA Section 22a-69 at the nearest property line which is located 300 feet to the north. Utilizing a more conservative noise propagation calculation than what is presented in the sound study results in the (32) inverters only being able to produce approximately 41 dBA sound pressure level at the nearest property line (which is 300 ft. to the north). This worst-case result is well below the 61 dBA required by the RCOSA Section 22a-69.

Question No. 37

Referencing Appendix J, describe infrastructure and water source(s) that would be installed to support livestock activities.

Response

No permanent infrastructure or permanent on-site water sources will be installed to support livestock activities. All materials required for the electric fence, that creates the individual paddocks during grazing activities, are portable. Water is supplied from the farm where the livestock are housed when they are not on site. The water is delivered to the site via cart or truck and placed in troughs that are emptied & cleaned on a regular basis troughs are

either refilled every 2-3 days or re-supplied from a temporary storage tank via a gravity fed system that utilizes a float valve.

Question No. 38

Referencing Appendix B, provide updated site plan(s) as necessary to identify any additional features that are proposed to accommodate sheep.

Response

There are no additional features proposed to accommodate sheep and therefore updated site plans have not been provided.

Question No. 39

Does EWST allow livestock grazing in areas adjacent to residences? Were the abutting property owners notified of livestock grazing at the site?

Response

EWST would permit livestock grazing in all portions of the Project Area, that portion of the Site within the security fence. None of these areas are immediately adjacent to abutting residences. The abutting property owners were, however, notified of the Petitioners plans to include sheep grazing as a part of the Project. That information was included in the abutters' introductory letter included in Appendix F of the Petition.

Question No. 40

If temporary electric fence is used at the site to create defined pasture areas within the solar field, what types of safety measures are in place to prevent electric fence shock hazards?

Response

To help prevent electric fence shock hazards, warning signs are attached to the fence with additional instructional signage placed on the exterior security gate fencing, independent of any

signage associated with operation of the solar array. The electric fence is powered by a 12-volt battery attached to a solar charger that is independent of the solar array and in no way touches nor energizes any permanent structure. According to the electric fence manufacturer: “Most modern fence energizers send very brief (less than 3/10,000 of a second in duration), high-voltage pulses (usually 2,000–6,000 volts) of electrons down the conductor every 1–2 seconds. Though powerful enough to deter animals and poultry, pulses this brief and this infrequent almost never pose a fire risk when the conductor is near combustible material. There simply isn’t enough “on” time for heat to build and allow ignition to occur.”

Question No. 41

What type of media and/or specialized equipment would be necessary to extinguish a solar panel/electrical component fire?

Response

See Petitioner’s response to interrogatory 33, indicating that no special media or equipment would be required.

Question No. 42

Would the Petitioner conduct outreach/training to local emergency responders regarding safety, fire control and other emergencies that could occur at the site?

Response

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

Environmental

Question No. 43

Referencing Appendix J, EWST intends to introduce pollinator habitat within the

“Project Area.” Where would pollinator habitat be established and what is the intended seed mix to create pollinator habitat?

Response

The Petitioner will be utilizing the Ernst Conservation Seeds Fuzz & Buzz Mix, which is a “pollinator” seed mix, throughout the entire proposed facility, thus the entire facility will be a pollinator habitat. Please refer to detail 1 on sheet DN-2 of the project plans contained in Appendix B for more information on this seed mix.

Question No. 44

Does the proposed fence design include a 4-to-6-inch gap at the bottom to allow for small animal passage. Would the fence have to be lowered in order to protect the sheep? If yes, could a farm style livestock fence (six-inch mesh) be installed instead to keep the livestock contained and to allow for small wildlife passage?

Response

The proposed chain link perimeter fence does not include a gap at the bottom, allowing for proper protection and containment of the sheep. The Petitioner would be willing to install a farm style livestock fence instead of a chain link fence, however the use of a farm style fence would not allow for the privacy mesh that is being proposed along Thrall Road.

Question No. 45

Would livestock manure affect water quality in downgradient wetlands/watercourses?
How can such effects be mitigated?

Response

According to a University of Nebraska study on water Quality and the Grazing Animals (see reference and hyperlink below) areas of farmland that are grazed with animals compared to

cropland may have better surface and groundwater quality if the fertilizer and animal waste inputs are low to moderate. Properly managed grazed land will protect the soil surface from erosion compared to cropland.

The study also states that one landscape management tool that has been found to be effective in reducing water pollution from both cropland and grazed areas in the humid eastern part of the United States is use of riparian buffer systems. Many studies at different sites in the Gulf Atlantic Coastal Plain region have shown that concentrations and loads of Nitrogen in surface runoff and subsurface flow are markedly reduced after passage through a riparian buffer.

In the case of East Windsor Solar Two, the sheep grazing program will be managed with the appropriate number of sheep per acre and rotated throughout the fenced Facility to ensure areas are not over grazed. Additionally, the fenced Facility is greater than 100' from any wetlands, leaving a significant riparian buffer to help filter stormwater runoff in addition to protecting water quality that is being managed within the stormwater basins. Based on the current design of the project and the Petitioner does not believe that the water quality will be affected by the grazing and as such no additional mitigation measures are required. Hubbard, R. K.; Newton, G. L.; and Hill, G. M., "Water Quality and the Grazing Animal" (2004). Publications from USDA-ARS/UNL Faculty. <https://digitalcommons.unl.edu/usdaarsfacpub/274/>

Question No. 46

What effect would runoff from the drip edge of each row of solar panels have on the site drainage patterns? Would channelization below the drip edge be expected? If not, why not?

Response

The solar panels drip edge will not have any effect on the site drainage patterns, as the stormwater will fall to the ground and travel as it does under the existing conditions.

Channelization is not expected below the panel's drip edge because, the rows of solar panels are not considered "closed systems," since there are gaps between each module, and because the facility is using a tracker style racking system so the edges of the panels are moving throughout the day. As such, the drip edge of each solar panel will not have an impact on the Site's drainage patterns, as stormwater will flow off the panels at multiple locations as the panels follow the contours of the existing land.

Question No. 47

Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and

representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

Response

See Attachment 4.

Facility Construction

Question No. 48

Approximately to what depth would the racking posts be installed?

Response

The racking post would be installed to a depth of approximately 10 feet below the surface, depending on location and specific geotechnical conditions.

Question No. 49

Has EWST met with the DEEP Stormwater Division? If yes, when? Please describe any recommendations, comments or concerns about the Project from the Stormwater Division.

Response

The Petitioner has not yet met with DEEP Stormwater Division due to the site having an existing on-site area already acting as a stormwater basin.

Question No. 50

Has EWST submitted an application for a stormwater permit? If yes, what is the status of such permit?

Response

An application for a stormwater general permit was submitted to DEEP on June 20, 2023 and is currently under review.

Question No. 51

How will sediment be removed and transported from stormwater features? Where would the removed sediment be disposed of?

Response

The sediment will be removed from the stormwater feature utilizing on-site equipment. The sediment would not be disposed of but rather spread over a portion of the host parcel and stabilized.

Facility Maintenance/Decommissioning

Question No. 52

Referencing Appendix E of the Petition, would project decommissioning include stormwater management features? If yes, how would the stormwater management system be removed?

Response

No, the Petitioner's decommissioning plan does not include the removal of the existing natural stormwater management feature on the Site today.

Question No. 53

Referencing Petition Sheet GN-2, Environmental Notes – Resources Protection Measures, under what circumstances would pesticides or herbicides be used at the solar facility site?

Response

The Petitioner does not intend to use of herbicides or pesticides at the Facility.

Question No. 54

Would the Petitioner store any replacement modules on-site in the event solar panels are damaged or are not functioning properly? If yes, in what location?

Response

No.

Question No. 55

Which is more cost-effective to maintain the vegetation within the array area: sheep grazing or periodic mowing? Explain.

Response

The Petitioner believes that overall, the use of sheep grazing can be more cost effective than periodic mowing and provides an acceptable form of agricultural co-use in accordance with the Connecticut Department of Agriculture March 23, 2023, comment letter.

ATTACHMENT 1

FLEXRACK SERIES

FlexTrack - S Series

Tough, Reliable Tracker & Team of Experts at Your Service

- Single row, central slew drive balanced system
- Engineered for long term durability and reliability
- Low cost to maintain
- Flexible to accommodate and optimize all your project design and generation needs
- Superior land density with no gaps at the bearings
- Available in Self-Powered and Grid-Powered options
- Designed with intuitive constructability which translates to superior installation times and lower project costs



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CONTROL SYSTEM

Data Feed	Ethernet to Network Control Unit
Power Consumption	Grid-Powered: 31kWh per tracker per year
Tracker Controller	1 Controller to DC motor per tracker
Size	230 x 100 x 150 mm
Battery (self-powered)	LiFePO4 (Lithium Iron Phosphate) Rechargeable 3Ah
Battery Charging (self-powered)	Optimum charging through CC/CV algorithm for LiFePO4 Chemistries which contributes to extended battery life
SoC Monitoring (self-powered)	SoC achieved through OCV and Coulomb counting algorithms
Operating Temperatures	Self-Powered: Charging: 0°C to 60°C / Discharge: -10°C to 60°C
Interface	HMI (includes enclosure mounted keypad LED visual interface)
Communication	Zigbee Wireless
PV Module (self-powered)	Crystalline Silicon 30W

SERVICES

Geotechnical Services	Configuration of Tracker Controls
Structural Analysis	Project Management
Layout and Design Services	PE Stamp
Foundation Design Services	On-site Training
Post Driving	Commissioning of Tracker System
Pull Testing	
Tracking System Installation	

UL COMPLIANCE

All Solar FlexRack systems have gone through UL testing. Each component-connection point within the system conforms to NEC codes for electrically bonded and conductive systems. Testing is performed by Solar PTL in accordance with UL 3703.

Certification covers both United States and Canada.

TRACKING

Tracking Method	Single-axis horizontal, distributed drive
Backtracking	Smart backtracking - customized to terrain for maximum production
Tracking Range	Up to 110° (± 55°)
Ground Coverage Ratio (GCR)	Configurable
Tracking Accuracy	2°
Stow Angle	Configurable

ARRAY CONFIGURATION

Panels per Tracker	Up to 90 (72 Cell Modules)
Trackers per Controller	1
String Voltage	Up to 1,500 volts
Posts per Tracker	Approximately 15 for 90 modules
Panel Configurations*	1 in portrait (crystalline) 2 in landscape (crystalline) 4 in landscape (thin film)
Drive Type	Slew 24 Volts DC

OPERATIONS AND MAINTENANCE

Scheduled Maintenance	None
Warranty	10 Years: Structural 5 Years: Drives and Electrical
Certifications	UL 3703
Dynamic Load Management	Limited progressive dampening technology
Snow Management	Programmable snow shedding

INSTALLATION TOLERANCES

North-south Slope Tolerance	Up to 10%
North-south Post Spacing	± 1.5 inches (.038 meter)
East-west Post Alignment	+/- 0.75 inches
Post Height	± 1 inch (0.025 meter)
Post Plumb	± 1°

CONSTRUCTION

Structural Materials	Hot dip galvanized steel
Bearings	UV-rated engineering plastic, no lubrication needed
Mechanical Connections	Bolted - no welding, drilling or cutting required

ENVIRONMENTAL

Operating Temperature	-30° C to +60° C (Grid) -10° C to +60° C (Self-Powered)
Wind (IBC-2012/ASCE 7-10)	Up to 130 mph 35 mph stow position
Snow Load	10 psf (standard) / Higher snow load available upon request

TESTING

Rain, wind, sleet, snow, heat - every day and everywhere, our products are battling the elements. We perform ongoing extensive testing in these key areas: wind tunnel, structural load, electrical bonding, and life cycle. Solar FlexRack trackers also undergo wind tunnel testing performed by RWDI and CPP, per American Society of Civil Engineers Standard ASCE 7.

*Adaptable to all module sizes

**NEARLY 50 YEARS &
OVER 3 GIGAWATTS**



Solar FlexRack, a division of Northern States Metals, is an integrated solar company that offers custom-designed, fixed tilt ground mount and single-axis solar tracking systems in the commercial and utility-scale solar mounting industries. Solar FlexRack also offers full services, including engineering, geotechnical, pullout testing, field, and layout design services to address the actual site conditions of a project site. Solar FlexRack has completed over 3 GW of solar racking installations in over 40 U.S. states and across the globe.

1-888-380-8138 | SOLARFLEXRACK.COM

ATTACHMENT 2

**EAST WINDSOR
SOLAR TWO, LLC**
124 LASALLE ROAD
2ND FLOOR
WEST HARTFORD, CT, 06107



567 VAUXHAUL STREET EXTENSION - SUITE 311
WATERFORD, CT 06385 PHONE: (860)-663-1697
WWW.ALLPOINTSTECH.COM FAX: (860)-663-0935

CSC PERMIT SET		
NO	DATE	REVISION
0	04/03/23	DRAFT SET FOR REVIEW: RCB
1	04/25/23	CSC PETITION: RCB
2	05/01/23	CSC PETITION: RCB
3	06/19/23	SWPCP SUBMISSION: RCB
4	07/xx/23	CSC INTERROGATORIES: RCB
5		
6		

DESIGN PROFESSIONAL OF RECORD

PROF: ROBERT C. BURNS P.E.
COMP: ALL-POINTS TECHNOLOGY CORPORATION
ADD: 567 VAUXHAUL STREET EXTENSION - SUITE 311 WATERFORD, CT 06385

OWNER: CATHOLIC CEMETERIES ASSOCIATION OF THE ARCHDIOCESE OF HARTFORD, INC.
ADDRESS: 700 MIDDLETOWN AVE. NORTH HAVEN, CT 06473

EAST WINDSOR SOLAR TWO

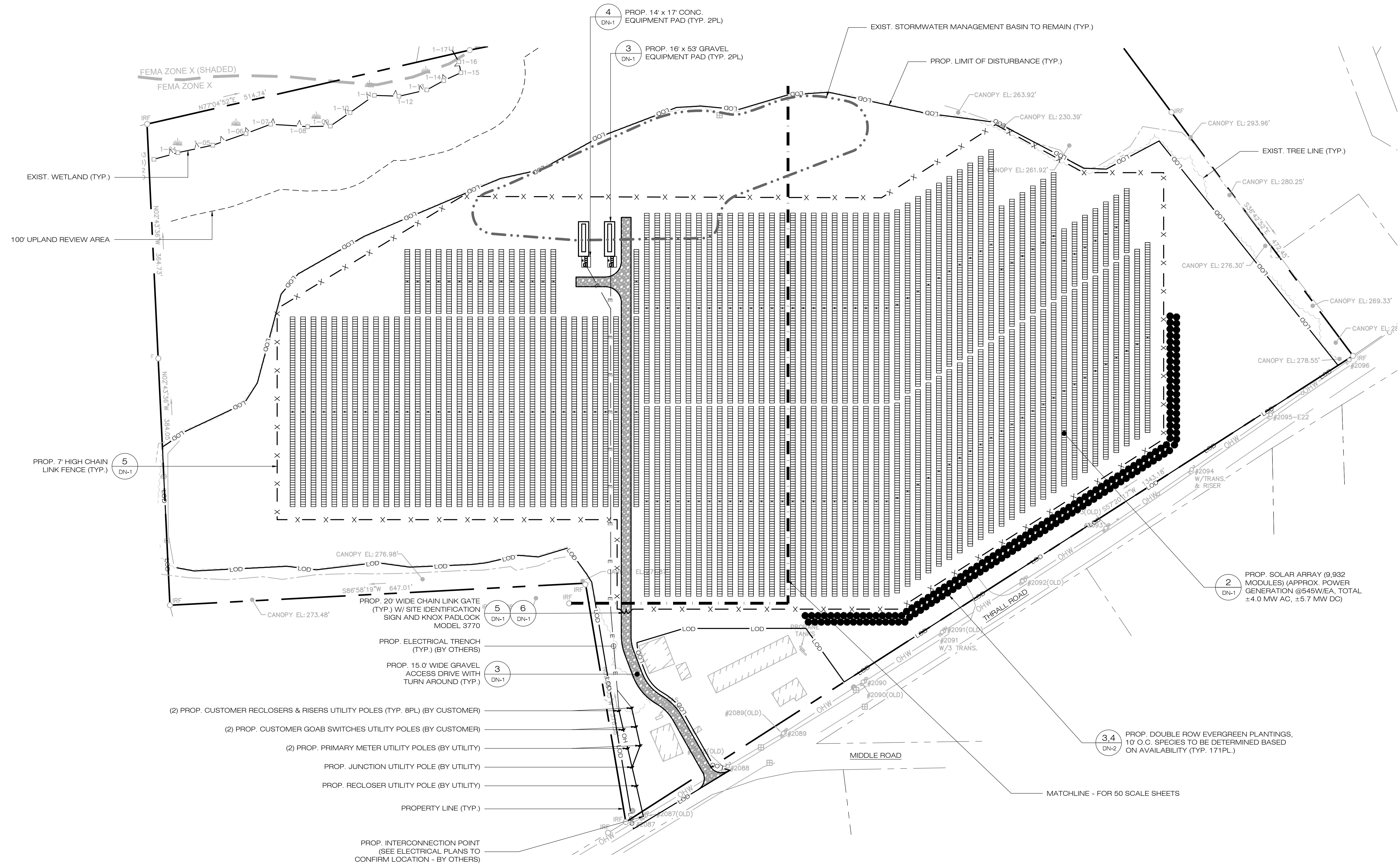
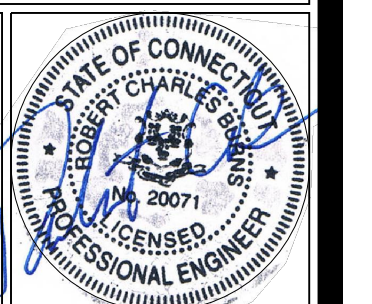
SITE ADDRESS: BROAD BROOK, CT 06016

APT FILING NUMBER: CT590340

DATE: 04/03/23 DRAWN BY: CSH CHECKED BY: RCB

SHEET TITLE:
PARTIAL SITE PLAN

SHEET NUMBER:
OP-2



4 PROP. 14' x 17' CONC. EQUIPMENT PAD (TYP. 2PL)

3 PROP. 16' x 53' GRAVEL EQUIPMENT PAD (TYP. 2PL)

2 PROP. SOLAR ARRAY (9,932 MODULES) (APPROX. POWER GENERATION @545W/EA, TOTAL ±4.0 MW AC, ±5.7 MW DC)

3.4 PROP. DOUBLE ROW EVERGREEN PLANTINGS, 10' O.C. SPECIES TO BE DETERMINED BASED ON AVAILABILITY (TYP. 171PL.)

5 PROP. 20' WIDE CHAIN LINK GATE (TYP.) W/ SITE IDENTIFICATION SIGN AND KNOX PADLOCK MODEL 3770

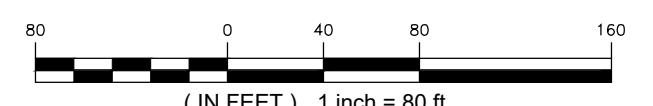
3 PROP. 15.0' WIDE GRAVEL ACCESS DRIVE WITH TURN AROUND (TYP.)

- (2) PROP. CUSTOMER RECLOSERS & RISERS UTILITY POLES (TYP. 8PL) (BY CUSTOMER)
- (2) PROP. CUSTOMER GOAB SWITCHES UTILITY POLES (BY CUSTOMER)
- (2) PROP. PRIMARY METER UTILITY POLES (BY UTILITY)
- PROP. JUNCTION UTILITY POLE (BY UTILITY)
- PROP. RECLOSER UTILITY POLE (BY UTILITY)
- PROPERTY LINE (TYP.)
- PROP. INTERCONNECTION POINT (SEE ELECTRICAL PLANS TO CONFIRM LOCATION - BY OTHERS)

1 PARTIAL SITE PLAN

OP-2

SCALE: 1" = 80'-0"



(IN FEET) 1 inch = 80 ft.

ATTACHMENT 3



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

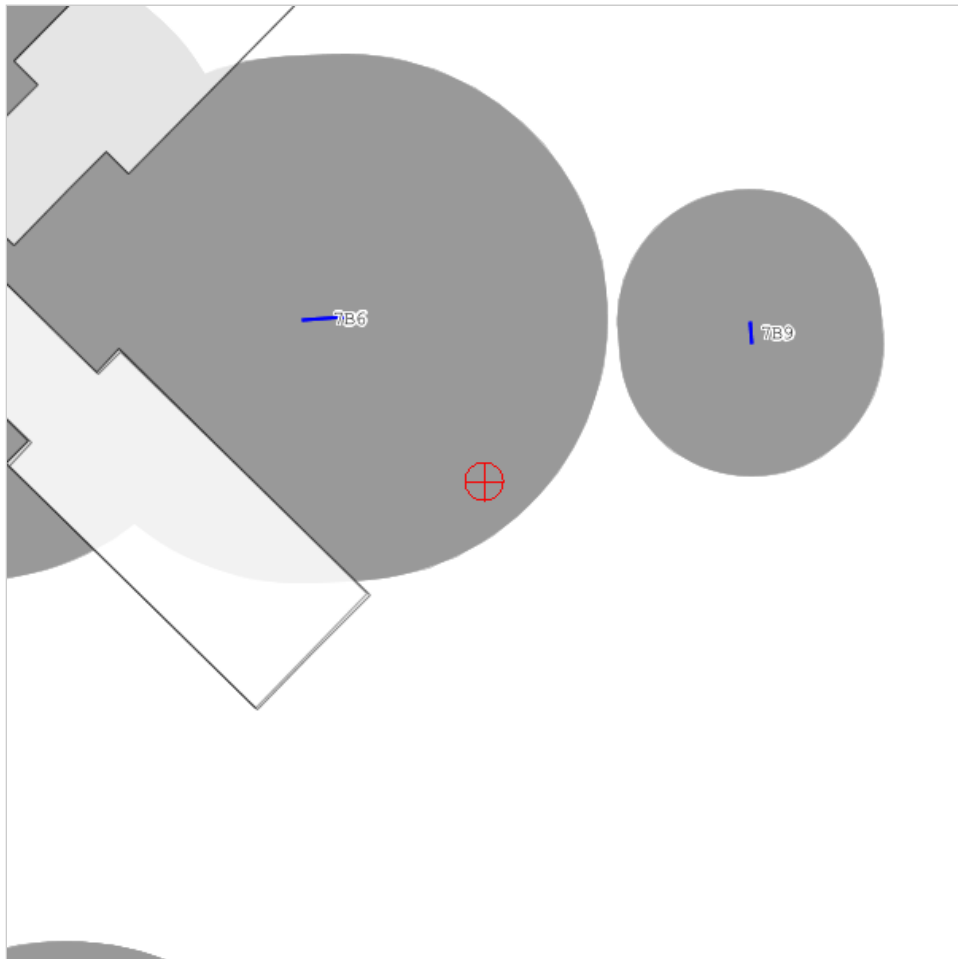
If you require additional information regarding the filing requirements for your structure, please identify and contact the appropriate FAA representative using the [Air Traffic Areas of Responsibility map](#) for Off Airport construction, or contact the [FAA Airports Region / District Office](#) for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

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

* Structure Type:	SOLAR Solar Panel ▼			
	Please select structure type and complete location point information.			
Latitude:	41 Deg	53 M	39 S	N ▼
Longitude:	72 Deg	31 M	53.3 S	W ▼
Horizontal Datum:	NAD83 ▼			
Site Elevation (SE):	222 (nearest foot)			
Structure Height :	12 (nearest foot)			
Is structure on airport:	<input checked="" type="radio"/> No <input type="radio"/> Yes			

Results

You do not exceed Notice Criteria.





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](#).

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- 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

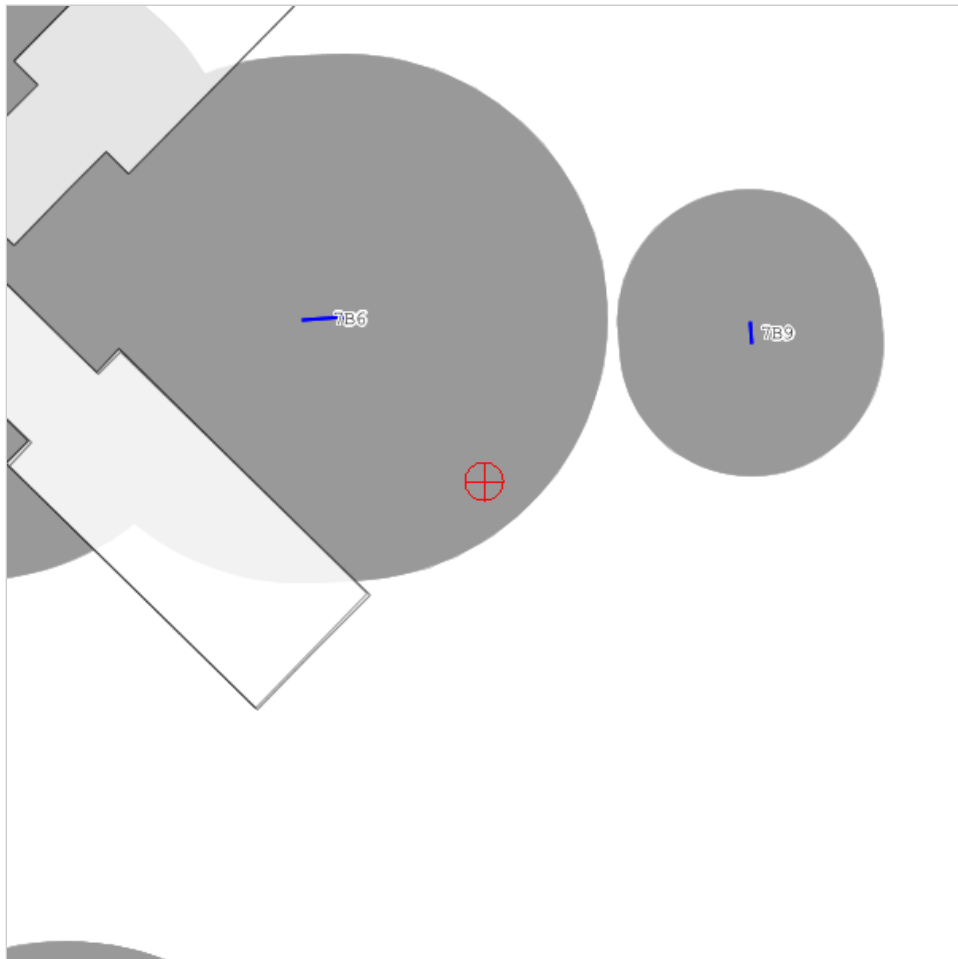
If you require additional information regarding the filing requirements for your structure, please identify and contact the appropriate FAA representative using the [Air Traffic Areas of Responsibility map](#) for Off Airport construction, or contact the [FAA Airports Region / District Office](#) for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

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

* Structure Type:	CRANE Mobile Crane <input type="button" value="v"/>			
	Please select structure type and complete location point information.			
Latitude:	41 <input type="text"/>	Deg	53 <input type="text"/>	M 39 <input type="text"/>
			S	N <input type="button" value="v"/>
Longitude:	72 <input type="text"/>	Deg	31 <input type="text"/>	M 53.3 <input type="text"/>
			S	W <input type="button" value="v"/>
Horizontal Datum:	NAD83 <input type="button" value="v"/>			
Site Elevation (SE):	222 <input type="text"/> (nearest foot)			
Structure Height :	40 <input type="text"/> (nearest foot)			
Is structure on airport:	<input checked="" type="radio"/> No <input type="radio"/> Yes			

Results

You do not exceed Notice Criteria.



ATTACHMENT 4

REMOTE FIELD REVIEW



CT SITING COUNCIL PETITION NO. 1572
RESPONSE TO INTERROGATORY #47
PROPOSED SOLAR ENERGY FACILITY
EAST WINDSOR SOLAR TWO
31 THRALL ROAD
EAST WINDSOR, CONNECTICUT

PREPARED FOR:

VEROGY

PREPARED BY:

ALL-POINTS TECHNOLOGY CORPORATION, P.C.
567 Vauxhall Street Extension – Suite 311
Waterford, CT 06385

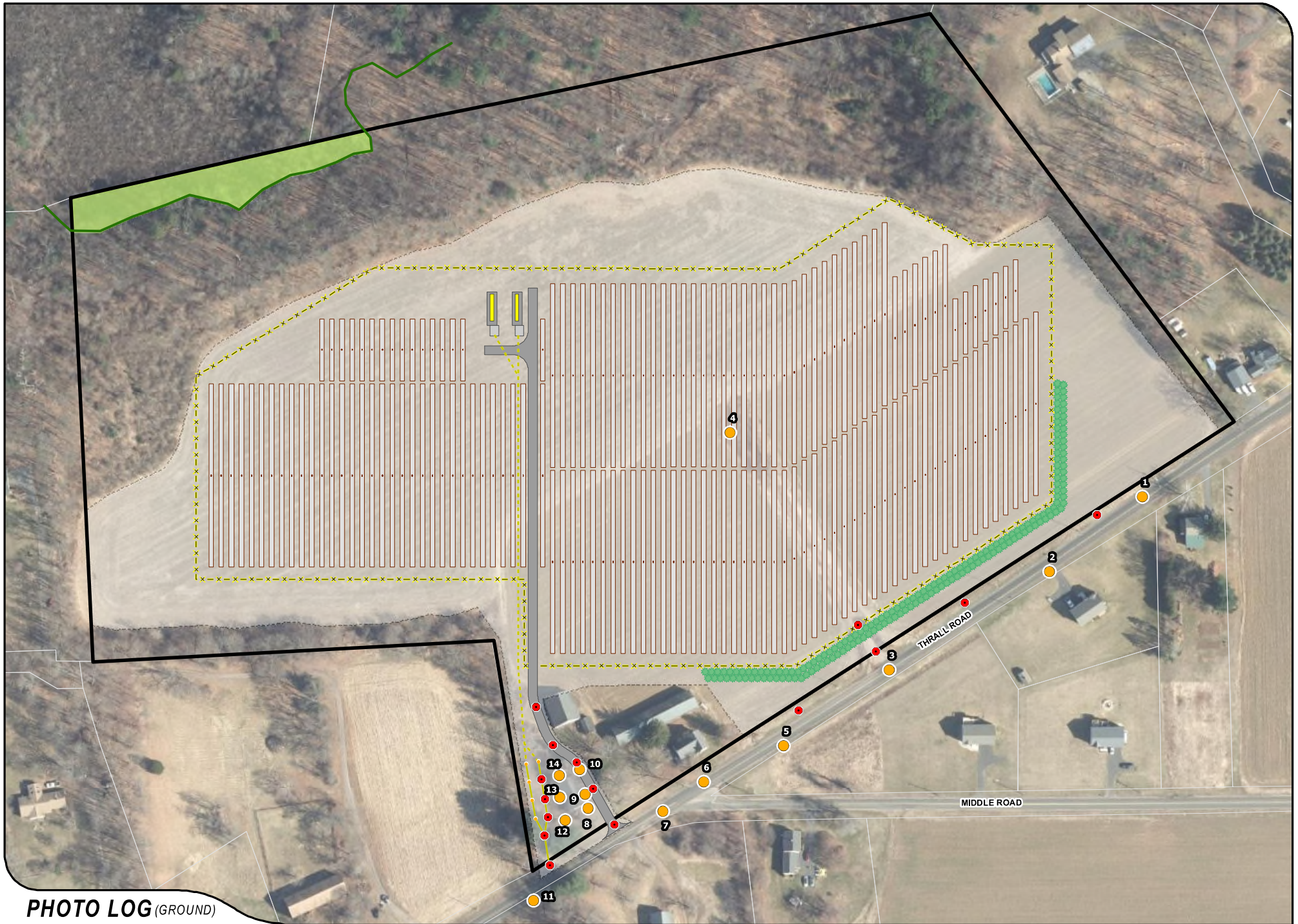
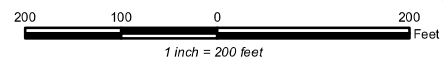


PHOTO LOG (GROUND)

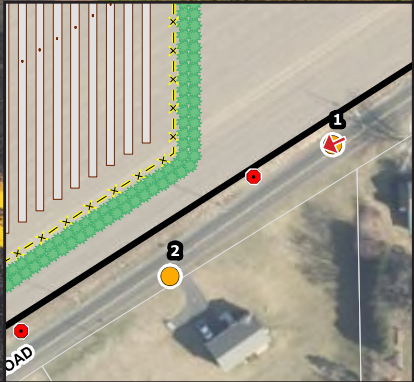
- | | | | |
|-----------------------------|------------------------|--------------------------------|-----------------------------|
| Photo Location | Solar Modules | Fence | Limit of Disturbance |
| Photo Marker | Gravel Access Drive | Interconnection Path | Landscape Plantings |
| Site | Equipment | Underground Electrical Utility | Delineated Wetland Boundary |
| Approximate Parcel Boundary | Concrete Equipment Pad | Utility Pole | Wetland Area |



Proposed Solar Energy Facility
 East Windsor Solar Two
 31 Thrall Road
 East Windsor, Connecticut



APPROXIMATE PARCEL BOUNDARY



PHOTO

DESCRIPTION

G-1

THRALL ROAD LOOKING SOUTHWEST



APPROXIMATE PARCEL BOUNDARY

PHOTO

2

DESCRIPTION

THRALL ROAD LOOKING SOUTHWEST



PHOTO

DESCRIPTION

3

THRALL ROAD LOOKING NORTHWEST



NORTH



EAST

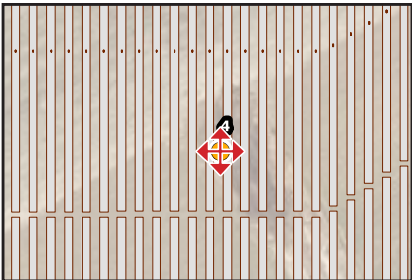


SOUTH



WEST

PHOTOGRAPHED ON 6/19/2023



PHOTO

4

DESCRIPTION

FOUR CARDINAL POINTS - TAKEN FROM ELEVATED HEIGHT +/-8'



PHOTOGRAPHED ON 6/19/2023

PHOTO

5

DESCRIPTION

THRALL ROAD LOOKING NORTHEAST



PHOTO

6

DESCRIPTION

THRALL ROAD LOOKING NORTHEAST



PHOTO

7

DESCRIPTION

THRALL ROAD LOOKING WEST



NORTH



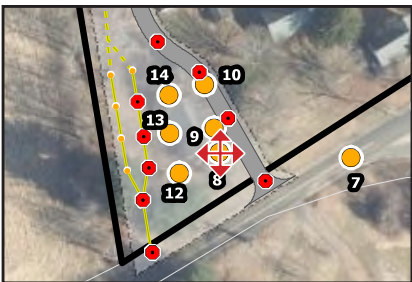
EAST



SOUTH



WEST



PHOTO

8

DESCRIPTION

FOUR CARDINAL POINTS



GRAVEL ACCESS DRIVE

PHOTO

9

DESCRIPTION

ACCESS DRIVE LOOKING NORTH



GRAVEL ACCESS DRIVE

PHOTO

10

DESCRIPTION

ACCESS DRIVE LOOKING NORTHWEST



PHOTOGRAPHED ON 6/19/2023

PHOTO

11

DESCRIPTION

THRALL ROAD LOOKING NORTH



PROPOSED INTERCONNECTION

PROPOSED INTERCONNECTION PATH

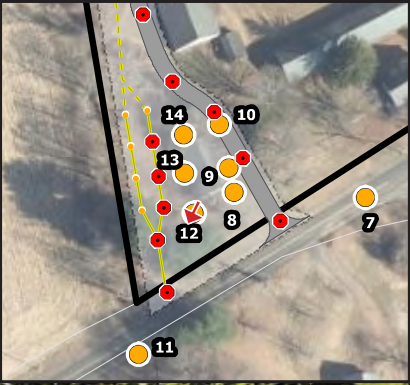


PHOTO
12A

DESCRIPTION
LOOKING SOUTHWEST

PHOTOGRAPHED ON 6/19/2023



PROPOSED INTERCONNECTION PATH

PHOTO
12B

DESCRIPTION
LOOKING NORTHWEST



PROPOSED INTERCONNECTION PATH

PHOTO

13

DESCRIPTION

LOOKING WEST



GRAVEL ACCESS DRIVE

PHOTO

14

DESCRIPTION

LOOKING NORTHWEST

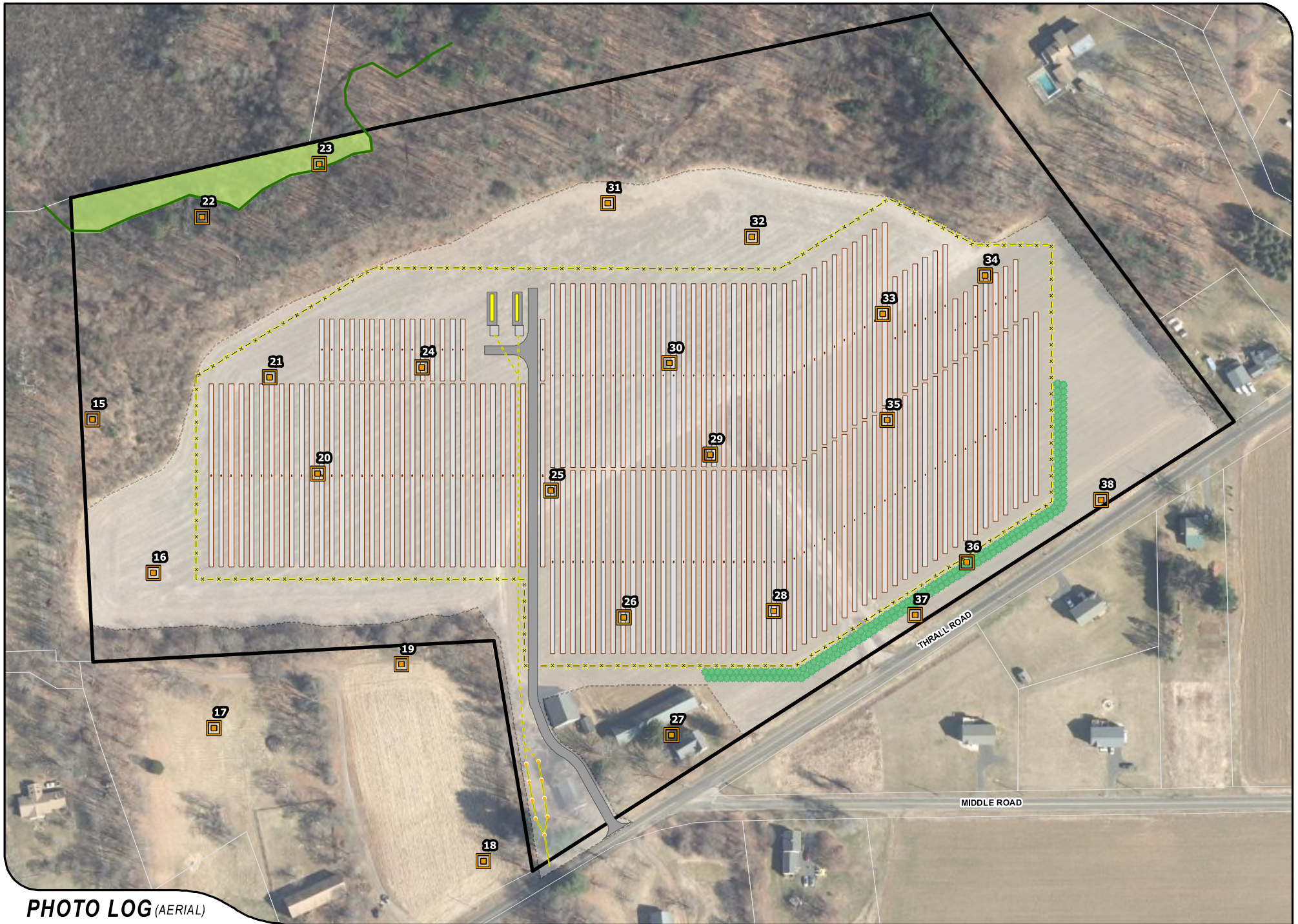
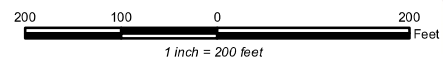


PHOTO LOG (AERIAL)

- | | | | |
|-----------------------------|------------------------|--------------------------------|-----------------------------|
| Drone Photo Location | Solar Modules | Fence | Limit of Disturbance |
| Site | Gravel Access Drive | Interconnection Path | Landscape Plantings |
| Approximate Parcel Boundary | Equipment | Underground Electrical Utility | Delineated Wetland Boundary |
| | Concrete Equipment Pad | Utility Pole | Wetland Area |



Proposed Solar Energy Facility
 East Windsor Solar Two
 31 Thrall Road
 East Windsor, Connecticut

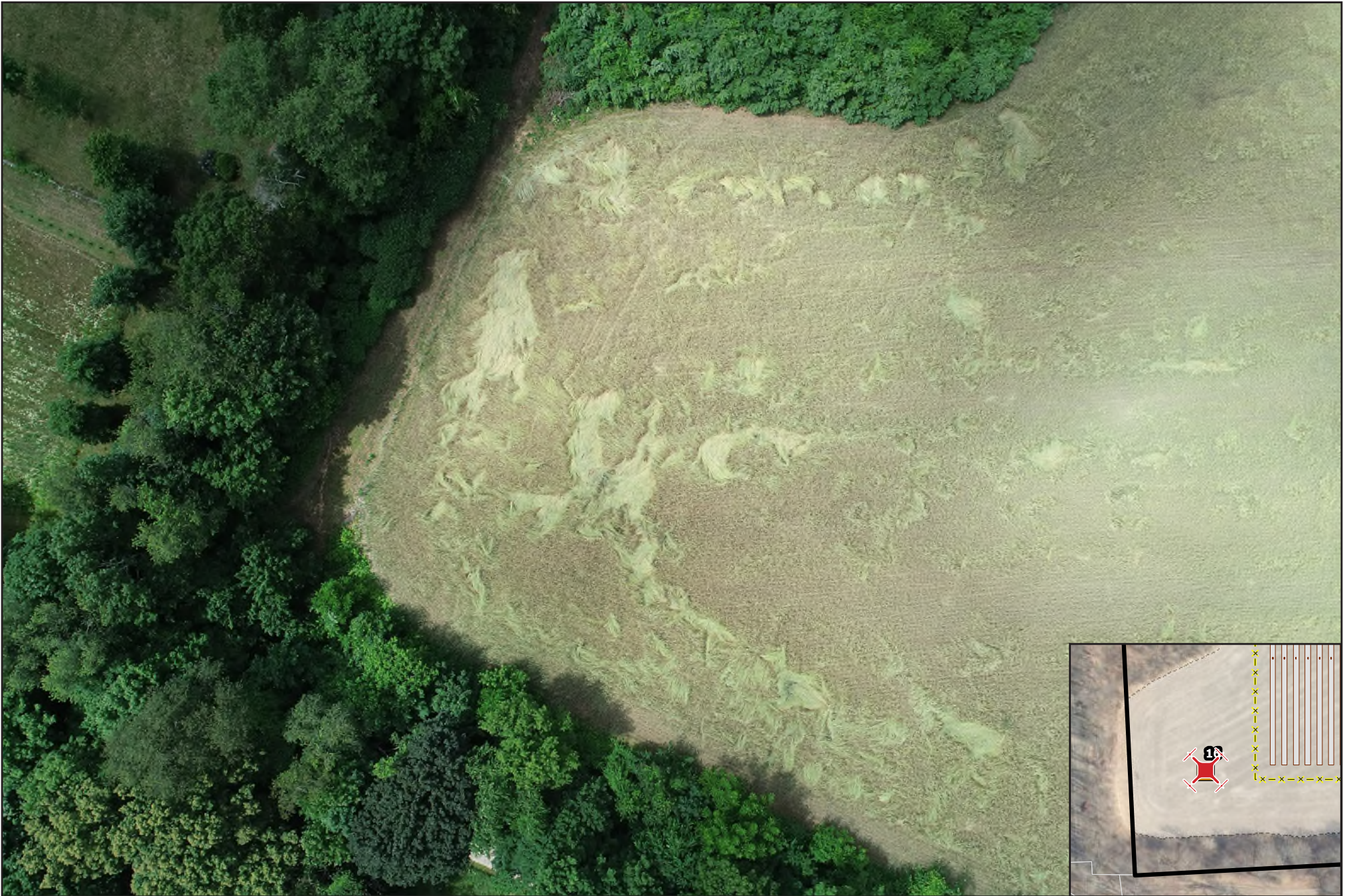


PHOTO

15

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

PHOTO

16

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

PHOTO

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DESCRIPTION

AERIAL PHOTOGRAPH



PHOTOGRAPH ON 6/19/2023

PHOTO

18

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

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AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

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PHOTO

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PHOTOGRAPHED ON 6/19/2023

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PHOTOGRAPHED ON 6/19/2023

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PHOTOGRAPHED ON 6/19/2023

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PHOTOGRAPHED ON 6/19/2023

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AERIAL PHOTOGRAPH



PHOTO
29

DESCRIPTION
AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

PHOTO

30

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTO

31

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTO

32

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTO
33

DESCRIPTION
AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

PHOTO

34

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

PHOTO

35

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

PHOTO

36

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

PHOTO

37

DESCRIPTION

AERIAL PHOTOGRAPH



PHOTOGRAPHED ON 6/19/2023

PHOTO

38

DESCRIPTION

AERIAL PHOTOGRAPH