



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

July 19, 2023

Matthew Melewski, Esq.
CT Solar PDF, LLC
c/o Nokomis Energy
2836 Lyndale Avenue South
Suite 132
Minneapolis, MN 55408
matthew@nokomisenergy.com

RE: **PETITION NO. 1580** – CT Solar PDF, 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 1.45-megawatt AC solar photovoltaic electric generating facility located at two parcels on the Medtronic campus at 86 Quinnipiac Avenue and 195 McDermott Road, North Haven, Connecticut, and associated electrical interconnection.

Dear Attorney Melewski:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than August 9, 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 August 9, 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

c: Service List dated June 20, 2023
mb/rm

Petition No. 1580
CT Solar PDF, LLC
86 Quinnipiac Avenue and 195 McDermott Road, North Haven

Interrogatories
July 19, 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. Would the project participate, or was the project selected, in a state or public utility-sponsored program?
4. Referencing Petition page 5, has CT Solar PDF, LLC (CTSP) received any comments since the petition was submitted to the Council? If yes, summarize the comments and state how these comments were addressed.
5. Referencing Petition Appendix G – Public Outreach, the March 13, 2023 letter references “... a 1.7 MW AC solar photovoltaic electric generating facility...” Explain.
6. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
7. If CTSP transfers the facility to another entity, would CTSP 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?

Proposed Site

8. 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.
9. In the lease agreement with the property owner, are there any provisions related to decommissioning or site restoration at the end of the project’s useful life? If so, describe and/or provide any such provisions.
10. Provide the distance, direction and address of the nearest property line and nearest residence from the proposed facility.

Energy Output

11. What is the anticipated capacity factor of the facility? Would the capacity of the system decline over time? If so, estimate annual losses.
12. Would the proposed facility provide baseload power, backup power or both for Medtronic? Referencing Petition p. 2, approximately what percentage of the Medtronic campus annual electric load would be served by the facility?
13. Would any surplus power be sold to the grid? Does CTSP have a contract to sell the electricity and/or renewable energy certificates (RECs) it expects to generate from the proposed facility?
14. Would the facility operate as an emergency generating device or under a demand response program?
15. If one section of the solar array experiences electrical problems causing the section to shut down, could other sections of the system still operate? By what mechanism are sections electrically isolated from each other?
16. If electrical service from United Illuminating experiences an outage, will the solar arrays be able to provide power to the Medtronic campus? If yes, in what areas of the campus will the power be utilized?

Proposed Facility and Associated Equipment

17. How many acres comprise each of the three array areas? How many acres comprise the interconnection corridor?
18. For the ground-mounted solar array, is the wiring from the panels to the inverters installed on the racking system? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation maintenance, or animals?
19. For the parking canopy array;
 - a. provide a drawing that provides detail of the proposed canopy design.
 - b. submit a photograph of the similar canopy design.
 - c. are the solar panels attached to a steel canopy roof? If so, is the steel roof pitched for sheet drainage or is runoff collected and directed to drainpipes?
 - d. To what depth would the canopy support columns be installed?
20. For the rooftop solar array;
 - a. will the panels be installed on an angle? If yes, what are the maximum and minimum heights of the panels above the roofline?
 - b. what is the height of the building roof above grade?
 - c. where is the interconnection point?
 - d. would the proposed installation affect existing rooftop stormwater drainage? If yes, would upgrades to the roof's drainage system be necessary?
 - e. how is rooftop stormwater captured and where is it discharged?

Interconnection

21. Referring to Petition p. 3, what is the status of the interconnection agreement with United Illuminating? Is the project interconnection required to be reviewed by ISO-NE?
22. Are any utility poles proposed for the interconnection? If yes, provide detail.

Public Safety

23. Would the Project comply with the current Connecticut State Building Code and National Electrical Code?
24. Was a building structural engineering analysis conducted for the rooftop solar array? Are roof/building modifications necessary to install the array?
25. Would training be provided for local emergency responders regarding site operation and safety for all three array types in the event of a fire or other emergency at the site?
26. In the event of a brush or electrical fire, how are potential electric hazards that could be encountered by emergency response personnel mitigated?
27. What type media and/or specialized equipment would be necessary to extinguish a solar panel/electrical component fire? 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?
28. How would emergency personnel access the top of the solar canopies and the rooftop array?
29. Describe procedures for manual shutdown of all three types of arrays if required by emergency responders.
30. For the parking canopy array;
 - a. what construction codes/standards are applicable to reduce or prevent damage to the structure/solar modules in the event of a vehicle fire under the canopy?
 - b. describe how the project design allows for unencumbered access to emergency vehicles such as a fire truck or ambulance?
 - c. is lighting proposed under the canopy array? If yes, provide detail and the governing lighting code.
31. Does the transformer have a containment system in the event of a leak? Can the remote-monitoring system detect an insulating oil leak?
32. Where is the nearest federally-obligated airport? Is an aviation glare analysis required for this facility to comply with FAA policy?

Environmental Effects and Mitigation Measures

33. Were subsurface soils evaluated for hazardous contaminants? Would excavated soils require disposal at a hazardous materials facility?
34. Referring to Site Plan C6.03, can additional pollinator-friendly species be incorporated into the seed mix?
35. Petition p. 8 states no tree clearing is necessary for the project; however, Site Plan C1.02 shows tree clearing. Clarify. How many acres of trees will be removed to develop the site?

Facility Construction

36. Referring to the Stormwater Report;
 - a. p. 5 states the total area of the project is approximately 3.88 acres, and the total area of disturbance is 1.4 acres. What specific areas are included in the 1.4-acre area?
 - b. p. 6 includes pre- and post-development condition tables that total 1.1 acres instead of 1.4 acres. Clarify.
37. Has CTSP submitted an application for a stormwater permit? If yes, what is the status of such permit?
38. Referring to Site Plan C1.02;
 - a. will clearing for the utility trench occur up to the edge of the Little River?
 - b. what type of erosion and sedimentation controls will be installed on the steep bank of the Little River?
39. Referring to Site Plan C6.02;
 - a. will the fence along the southside of the utility trench limit of disturbance be removed? If yes, will it be replaced?
 - b. will installation of the utility trench require cut and/or fill along the bank of the Little River to create a level surface for installation of the underground conduit? If not, to what depth will the conduit be installed along the steep bank?
 - c. after installation of the underground conduit, can native shrubs be planted within the disturbed areas along the Little River?
40. 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.

Facility Maintenance/Decommissioning

41. Referring to p. 4 of the Decommissioning Plan, what is the approximate maximum lifespan of each array area?
42. Would replacement modules be stored on-site in the event solar panels are damaged or are not functioning properly? If yes, in what location?
43. Would the design of the parking canopy array cause snow/and or ice to accumulate and stay in place during prolonged incidents of cold weather? Is there a plan to remove snow/ice to prevent an ice fall hazard? If yes, describe snow/ice removal methods and site access.
44. Would the underside of the parking canopy array have the potential to act as shelters or nesting areas for wildlife? Would nests/droppings be periodically removed from the parking areas/columns?
45. Has the manufacturer of the proposed solar panels conducted Toxicity Characteristic Leaching Procedure (TCLP) testing to determine if the panels would be characterized as hazardous waste at the time of disposal under current regulatory criteria? If so, submit information that indicates the proposed solar modules would not be characterized as hazardous waste. If not, would CTSP agree to install solar panels that are not classified as hazardous waste through TCLP testing?