



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

December 4, 2023

Timothy Coon, P.E.
Principal Engineer
J.R. Russo & Associates, LLC
P.O. Box 938
East Windsor, CT 06088
tcoon@jrusso.com

RE: **PETITION NO. 1592** – Santa Fuel, Inc. petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 3.85-megawatt AC solar photovoltaic electric generating facility located at 159 South Road, Somers, Connecticut, and associated electrical interconnection. **Council Interrogatories to Petitioner.**

Dear Timothy Coon:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than December 20, 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 December 20, 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

MAB/RDM/dll

c: Service List dated September 19, 2023

Petition No. 1592
Santa Fuel, Inc.
159 South Road, Somers, Connecticut

Pre-Hearing Interrogatories
December 4, 2023

Notice

1. Has Santa Fuel, Inc. (SFI) received any comments since the petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.

Project Development

2. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
3. What is the estimated cost of the project?
4. 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?
5. Was the project selected through a RFP process? If so, which RFP? If not, would SFI submit the project in future RFPs?
6. Is the project subject to a virtual net metering agreement? Would all 3.85 megawatts AC be dedicated to virtual net metering?
7. Does SFI have a contract to sell the electricity and renewable energy certificates (RECs) it expects to generate with the proposed project? If so, to which public utility? If the electricity is to be sold to more than one public utility, provide the percentage to be sold to each public utility.
8. What authority approves the power purchase agreement (PPA) for the facility? Has a PPA with an electric distribution company been executed? If so, at what alternating current megawatt output? If not, when would the PPA be finalized?
9. What is the length of the PPA? Are there provisions for any extension of time in the PPA? Is there an option to renew?
10. Is the alternating current megawatt capacity of the facility fixed at a certain amount per the PPA and/or the RFP? Is there an option within the PPA to allow for changes in the total output of the facility based on unforeseen circumstances?
11. If the PPA expires and is not renewed and the solar facility has not reached the end of its lifespan, will SFI decommission the facility or seek other revenue mechanisms for the power produced by the facility?

12. If SFI transfers the facility to another entity, would SFI 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

13. Referencing Petition p. 3, 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 to facilitate the host property owner's future intended use of the site? If so, please describe and/or provide any such provisions.
14. Does the lease agreement with the property owner contain provisions for agricultural co-uses at the site? If yes, describe the co-uses.
15. 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 project affect the use classification?
16. Has the State of Connecticut Department of Agriculture 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?
17. Are any portions of the site under lease by any third party? If yes, when does the lease expire?
18. Provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar field perimeter fence, transformer pads, and the proposed access drive.
19. Referencing Petition Exhibit XIII Phase 1 Archeological Investigation, the Site Plan depicts a larger project footprint which was subsequently reduced. What were the reasons for the reduction in the size of the project?

Energy Output

20. 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 any contract(s).
21. 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?
22. Would SFI participate in an ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?
23. What is the projected capacity factor (expressed as a percentage) for the proposed project?
24. Have electrical loss assumptions been factored into the output of the facility?
25. Would the power output of the solar panels decline as the panels age? If so, estimate the percent per year.

26. Would SFI construct the facility if the solar array footprint was further reduced? If yes, indicate the minimum facility output (MW) required to retain the project's viability.

Proposed Facility and Associated Equipment

27. How many inverters are proposed for the two inverter racks shown on Site Plans 5 & 6?
28. Could the location of the inverters be modified to reduce operating noise at the property lines to the maximum extent possible? Explain.
29. Referring to Petition Exhibit IV, PV Module Specification Sheets, define the term Micro Gap.
30. Provide a specification sheet for the inverters. At what time interval would the inverters need to be replaced?
31. 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 animals?

Electrical Interconnection

32. Referring to Petition p. 7, has SFI submitted an interconnection request to Eversource? If yes, what is the status of the interconnection request? If not, when would it be filed?
33. Is the facility interconnection required to be reviewed by ISO-NE? Is the project listed on the most recent ISO-NE Interconnection Queue? Is an ISO-NE study or approval required?
34. Referring to Petition p. 7, what off-site upgrades are necessary to facilitate the Project interconnection?
35. Referencing Petition Exhibit XIII Phase 1 Archeological Investigation Site Plan A-101C, dated March 31, 2023, the interconnection and access drive area does not match that provided in the Petition Site Plans. Submit a revised Site Plan A-101C that shows the current proposed project design.
36. What were the reasons the project interconnection was redesigned from the configuration shown on Site Plan A-101C dated March 31, 2023?
37. Petition Site Plan 6 shows a new utility pole on the west side of Route 83 to facilitate the Project interconnection. What is the address of this residence? Was this residence and abutting residencies notified of the Project? If yes, when and by what means? If not, when will notice be made?
38. Have there been any discussions with Eversource to use pad-mounted equipment rather than pole-mounted equipment? Provide cost estimates for both an overhead and underground interconnection.

Public Safety

39. Would the project comply with the current Connecticut State Building Code, National Electrical Code and Connecticut State Fire Prevention Code?
40. What are industry Best Management Practices for Electric and Magnetic Fields at solar facilities? Would the site design conform to these practices.
41. The Petition Decommissioning Plan mentions an alarm system. Will an alarm system be installed at this site?
42. In the event of a brush or electrical fire, how are potential electric hazards that could be encountered by emergency response personnel mitigated?
43. What type of media and/or specialized equipment would be necessary to extinguish a solar panel/electrical component fire?
44. What type of oil is within the transformers? Do the transformers have a containment system in the event of a leak? How are oil leaks detected?
45. Referencing Petition p. 15, identify the distance/direction of the nearest federally-obligated airport from the proposed site. Is an aviation glare analysis required for potential glare hazards to aviation using this airport?
46. Would the installation of racking posts affect well water quality from construction impacts, such as vibrations and sedimentation?
47. What noise-generating equipment would be installed at the site? Provide noise profile information for all noise generating equipment during site operation.
48. Referencing Petition p. 14, what does the 61 dBA noise value represent, one inverter unit or a bank of inverters operating simultaneously?
49. Based on the noise profile information for the selected equipment, what is the collective operational noise level of the equipment at the nearest property boundary? Does this noise level meet applicable DEEP Noise Standards?

Environmental Effects and Mitigation Measures

50. Referencing Petition Site Plan 1, does the abutting land to the east, owned by the Northern Connecticut Land Trust, contain hiking trails? If yes, would the project be visible from the trails?
51. Referring to Petition 15, it states the Project would not require clearing in core forest. Would removal of edge forest for site construction shift the boundary of the edge forest further east, thereby causing a reduction in the amount of core forest? Provide an aerial photograph that depicts pre- and post-construction acreage of core and edge forest.

52. 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).

Facility Construction

53. Submit a construction fuel materials storage, refueling and spill response plan.
54. Petition p. 10 states slopes in the southern portion of the array will be regraded to 15%. What is the existing grade in this area?

Facility Maintenance/Decommissioning

55. Provide an Operations and Maintenance Plan to include procedures for vegetation maintenance, stormwater control inspections and repair, pesticide/herbicide use, panel washing and landscape vegetation replacement.
56. Would project decommissioning include stormwater management features? If yes, how would the stormwater management system be removed?