



January 6, 2025

**VIA ELECTRONIC MAIL AND HAND DELIVERY**

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

**Re: Response to Council Interrogatories  
PETITION NO. 1592A - 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 3.575-megawatt AC  
solar photovoltaic electric generating facility located at the 159 South Road,  
Somers, Connecticut, and associated electrical interconnection.**

Dear Ms. Bachman:

On behalf of Santa Fuel, Inc., I am enclosing the original and fifteen copies of the Responses to the Interrogatories issued by the Council on December 17, 2024 in connection with the above-referenced petition. Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been submitted to all parties on the Petition Services List as of this date.

Sincerely,

Timothy A. Coon, P.E.  
**J.R. Russo & Associates, LLC**

**Enclosures**

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

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 3.575-megawatt AC solar photovoltaic electric generating facility located at the 159 South Road, Somers, Connecticut, and associated electrical interconnection.

Petition No. 1592A

January 3, 2025

**RESPONSES TO THE DECEMBER 17, 2024 PRE-HEARING INTERROGATORIES  
DIRECTED TO SANTA FUEL, INC. FROM THE CONNECTICUT SITING COUNCIL**

Petitioner Santa Fuel, Inc (“SFI” or “Petitioner”) hereby submits the following responses to the Interrogatories that were directed to SFI by the Connecticut Siting Council on December 17, 2024.

**Notice**

1. Did Santa Fuel, Inc. (SFI) contact the Town of Somers regarding the revised site design? If yes, describe such consultation and summarize any comments from the Town regarding the revised site design.
  - A. We have provided the updated site design to the Town and are awaiting a response to meet in person if necessary or to be prepared to formally provide answers to any questions.

**Public Benefit**

2. Was the revised project selected through an RFP process? If so, which RFP? If not, would SFI submit the revised project in future RFPs?
  - A. No. The power will be sold to a customer via a retail supplier contract, not a CT-sponsored solar program at this time.
3. 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.

- A. See above. Outreach to potential customers is underway while we await the Eversource Group Study to be completed by Q4 2025
- 4. Referencing Motion to Reopen p. 3, would the reduction in the generating capacity of the proposed facility from 3.85 MW to 3.575 MW for the revised facility impact the proposed facility's qualifications to bid into any RFP? Explain.

A. No

### **Proposed Site**

- 5. Provide the distance, direction and address of the nearest property line and nearest off-site residence from the revised solar field perimeter fence, transformer pads, and proposed access drive.
  - A. The nearest property line to the perimeter fence is 1' to the north. The abutting property is 103 South Road, which is other agricultural land of the owner of the project site.
  - B. The nearest property line to the transformer pads is approximately 125' to the east. The abutting property is 700 Main Street, which is the preserved forested land owned by the Northern Connecticut Land Trust.
  - C. The nearest property line to the access drive is 3' to the north. The abutting property is 103 South Road, which is other agricultural land of the owner of the project site.
  - D. The nearest off-site residence to the perimeter fence is approximately 200' to the south at 185 South Road.
  - E. The nearest off-site resident to the transformers is approximately 726' to the west at 160 South Road.
  - F. The nearest off-site residence to the access drive is approximately 100' to the west at 100 South Road. The access drive is an existing drive that was previously used as the main access road for the former gravel removal operation at the site and is currently used to access the agricultural field.
- 6. Referencing Motion to Reopen p. 5, by how many square feet was grading reduced?
  - A. The proposed modifications to the Site Plan will result in a reduction in site grading of approximately 62,000 square feet.
- 7. What is the length of the revised access drive?
  - A. The new access drive, from the edge of South Road to the turn-around at equipment pad #1, is approximately 2,480 feet. This includes approximately 630 feet of existing access drive that currently extends from the edge of South Road to the edge of the existing agricultural field.

### **Proposed Facility and Associated Equipment**

8. Referencing Motion to Reopen p. 4, besides the reduction in the number of panels, describe any other changes to the associated solar array equipment proposed for the site.
  - A. Other than the panel count, all other details will be the same as originally represented to the Council.

### **Electrical Interconnection**

9. Has Eversource reviewed and approved the revised interconnection design?
  - A. Yes, Eversource has reviewed and approved the revised interconnection design, which will utilize a point-of-interconnection (POI) on Mountain View Rd.
10. Referencing Motion to Reopen p. 5, what is the estimated cost savings associated with the elimination of the utility work necessary to extend a new circuit on the existing poles along South Road?
  - A. : The estimated cost savings are still to be determined since the final interconnection upgrade costs will be finalized upon the completion of the group study and executable interconnection service agreement, but the estimated savings should be in the range of \$80,000 to \$120,000.
11. What is the status of the interconnection review by ISO-NE?
  - A. The Group Study is awaiting its start date with an expected completion in Q4 2025.
12. Referencing Motion to Reopen Site Plan Sheet 6, was an interconnection and associated access drive route considered further east, in the area of moderate slopes? What was the reason this area is not suitable?
  - A. The point where the interconnection access drive comes out to Mountain View Road was selected to maximize the available sight distance and minimize the Sight Line Easement required across the front of the property at 23 Mountain View Road. Moving the driveway further up the hill toward 23 Mountain View Road, where the slopes are more gradual, would reduce the available sight distance around the corner to the east and require a larger encroachment across the front of the 23 Mountain View Road for the easement.
13. Referencing Motion to Reopen p. 4 and the Sight Line Demonstration Plan behind Attachment A, what is the basis for the standards that were used for the sight line criteria (ex. Connecticut Department of Transportation requirements, Eversource Energy requirements)?

- A. The required sight distance was calculated in accordance with the Connecticut Department of Transportation Highway Design Manual procedures for intersection sight distance (ISD). A revised Sight Line Demonstration Plan is provided as Attachment 1. Upon review, it was determined that the slope factor adjustment applied to the initial ISD calculation is not warranted. The plan was revised to provide the correct ISD criteria. The revised Plan indicates that the required ISD is still provided at the proposed driveway. However, the revision resulted in a reduction in the size of the Easement required across the property at 23 Mountain View Road.
14. Could relocation of the interconnection and associated access drive eliminate and/or minimize the need for a sight line easement and/or the associated tree clearing and bank cutting? Explain.
- A. As discussed above, the location of the interconnection and associated access drive were selected to maximize the available sight distance and minimize the need for sight line easement. Relocation may reduce clearing and grading requirements, but it would also increase the encroachment of the sight line easement required on the adjacent property.
15. Would SFI be willing to pad-mount its meter, recloser and switch equipment instead of using utility poles? If pad-mount equipment is possible, provide dimensions of the associated cabinet and concrete pad.
- A. Yes, but we would await Eversource feedback if they would allow this. The goal of moving the access was to allow for the equipment to stay on the poles.

### **Public Health and Safety**

16. Referencing Motion to Reopen Attachment B and Site Plan Sheet 5, what color sound curtain is proposed? What is the lifespan of the material?
- A. The color of the proposed sound barrier blankets will be gray, and based on conversations with the manufacturer, the blanket's expected lifespan will exceed the solar project's life cycle as long as they are not damaged during an extreme weather event. The blankets will be monitored during the regularly planned operations and maintenance activities for the project.
17. Site Plan Sheet 5 specifies the use of a sound curtain from Acoustical Solutions "or equivalent". What other noise mitigation practices or materials may be considered for the site?
- A. The "or equivalent" is provided to give the site contractor the ability to furnish a sound curtain from an alternative manufacturer or provider other than Acoustical Solutions, as long as it has equivalent sound-reducing properties. No other noise mitigation practices other than the sound curtain are proposed or being considered.

## **Environmental Effects and Mitigation Measures**

18. Referencing Motion to Reopen Attachment D, was an amphibian survey conducted for the two ponds? If yes, provide the survey report. If not, does the existing agricultural land east of the ponds where the site is proposed provide suitable habitat for amphibians?

- A. An amphibian survey of the two ponds was not conducted. It is understood that amphibians may be present in the ponds. However, no endangered or threatened species of amphibians were identified by a review of the CT DEEP's Natural Diversity Database nor the U.S. Fish & Wildlife Service Information for Planning and Conservation (IPaC) system. In addition, the project meets the DEEP's requirement of a 50' setback from the wetland associated with the pond to any proposed disturbance.

A letter regarding the potential impacts to amphibians in the agricultural field has been prepared by the wetland consultant, Rick Zulick. Mr. Zulick's letter concludes that no negative impacts to amphibian life or any other wildlife supported by the ponds is anticipated. This letter is provided as Attachment 2.

19. Characterize the visibility of the acoustic sound barrier from off-site locations.

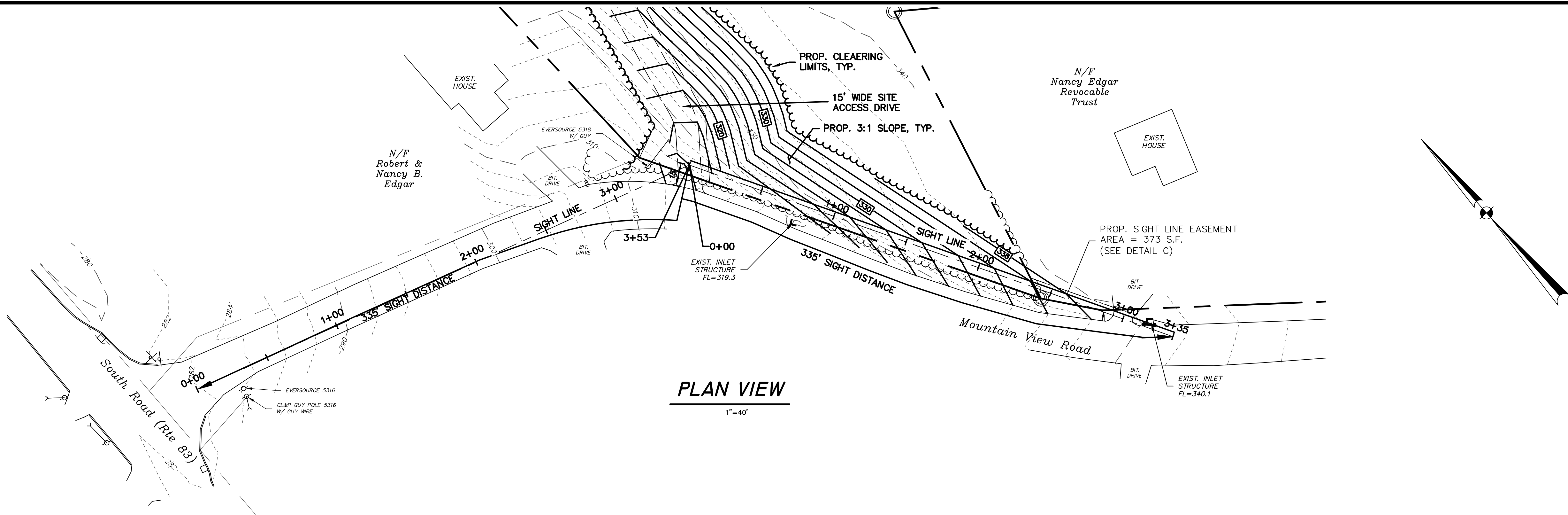
- A. The proposed sound barriers are located along the eastern edge of the array adjacent to the equipment pads. Based on the location and size of the sound barriers, they are not anticipated to be visible from the abutting streets, nor any residences.

Respectfully submitted,

William Ostrander  
Santa Fuel, Inc.

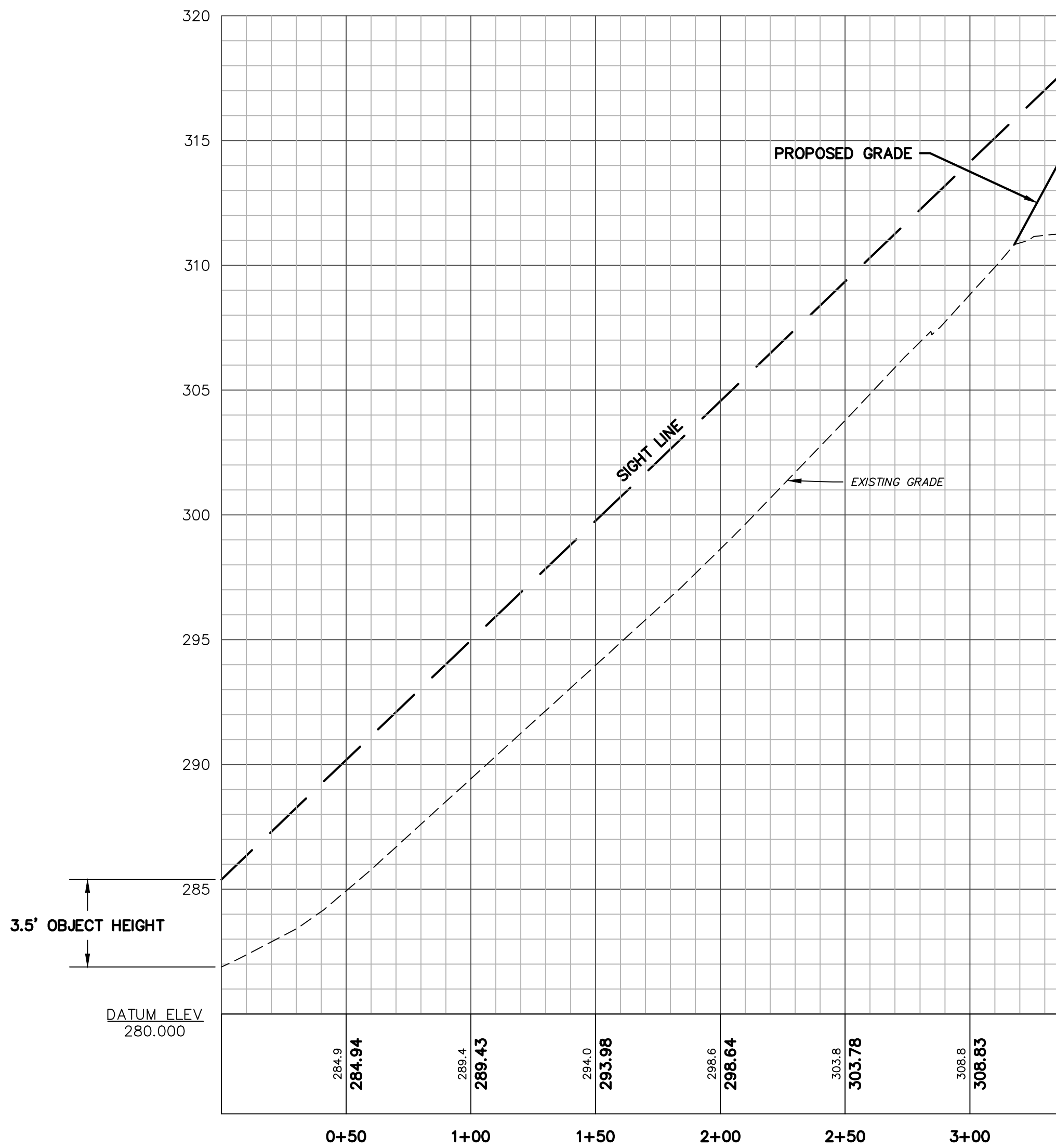
**ATTACHMENT 1**  
**Revised Sight Line Demonstration Plan**

S:\Acad\2023 Civil 3D\2023-001 Louth Callan Renewables\Russo Drawings\2023-001.dwg, 1:1



PLAN VIEW

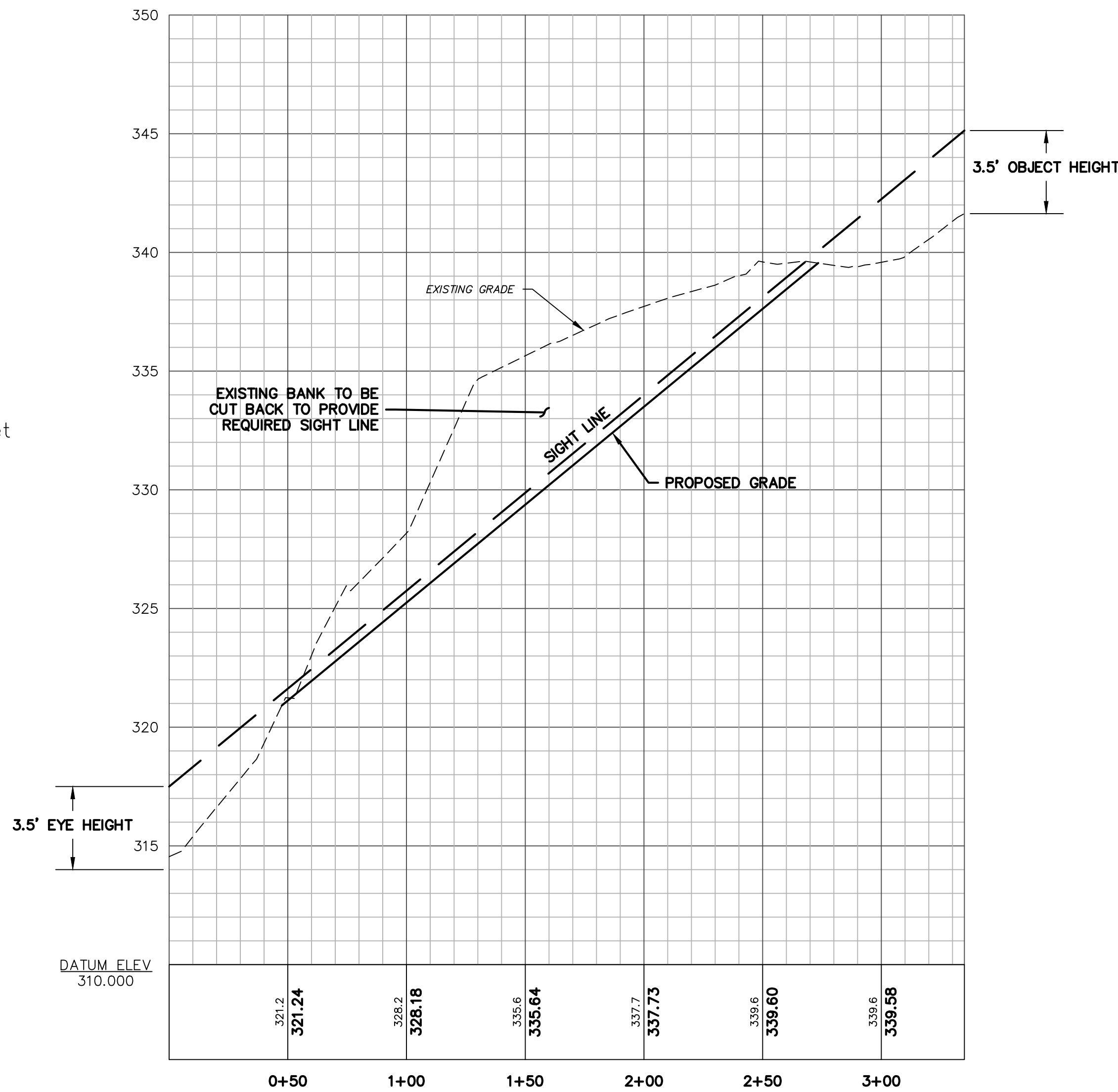
1"=40'



EASTBOUND APPROACH PROFILE

HOR: 1"=40', VERT: 1"=4'

Sight Line Criteria  
Posted/Design Speed: 30mph  
Required Sight Distance: 335 feet



WESTBOUND APPROACH PROFILE

HOR: 1"=40', VERT: 1"=4'



J.R. Russo & Associates, LLC  
SERVING CT & MA  
PO Box 088, 150 Shann Rd East Windsor, CT 06088  
www.jrusso.com • CT 860.623.0569 • MA 403.785.1159

Applicant  
**Santa Fuel, Inc.**  
154 Admiral Street  
Bridgeport, CT 06605

12-27-24 REQUIRED SIGHT DISTANCE

REVISIONS

BY: LF/TAC CHK: JEU

**Somers Solar**  
159 South Road  
Somers, Connecticut  
Map 05 Lot 73 Zone: A-1

**Mountain View Rd  
Access Drive  
Sight Line  
Demonstration Plan**

DATE  
9-12-24

SCALE  
HOR: 1"=40'; VERT: 1"=4'

JOB NUMBER  
2023-001

SHEET  
1 of 1



**ATTACHMENT 2**  
**Letter Regarding Amphibians**

**Richard Zulick R.S, S.S**  
**Certified Forester / Soil Scientist**  
400 Nott Highway  
Ashford, CT. 06278

January 3, 2025

Re: Response Report: Somers Solar Project - South Road ,Rte 83 Somers , CT

To Whom it may concern:

This report summarizes recent concerns related to the development of existing hay fields with a solar array on approximately 17 acres. The report only addresses the post-development condition, assuming that erosion controls will be sufficient during the construction phase of the project. More specifically, it addresses amphibian habitat within the proposed development area.

No specific amphibian study was conducted as part of my wetland delineation and assessment.

The wetlands identified on this property may provide habitat for amphibians, however, no amphibians were observed by me during my time spent on the property.

It is my opinion that adequate separation distance has been met to the proposed development to protect amphibians within and between the wetland proper area(s).

The bulk of the proposed development has been proposed in agricultural fields which are certainly not the most desirable habitat for amphibians, however, if during extremely wet periods amphibians choose to travel through the developed area, this solar development will provide as much, or more safe passage and food to amphibians as it has in the past.

Based on the discussion above, no negative impacts to amphibian life or any other wildlife supported by the ponds is anticipated.

If you have any questions concerning the wetland function assessment or this report, please feel free to contact me.

Sincerely,



Richard Zulick  
Certified Forester and Soil Scientist  
Member SSSSNE