



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

December 17, 2024

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. 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 3.85-megawatt AC solar photovoltaic electric generating facility located at 159 South Road, Somers, Connecticut, and associated electrical interconnection. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b). **Council Interrogatories to Petitioner.**

Dear Timothy Coon:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than January 7, 2025. 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 January 7, 2025 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

Enclosure: Revised Schedule dated December 17, 2024

c: Service List dated October 17, 2024



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REVISED SCHEDULE

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 3.85-megawatt AC solar photovoltaic electric generating facility located at 159 South Road, Somers, Connecticut, and associated electrical interconnection. **Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b).**

Motion to Reopen filed with the Council	09/18/2024
Motion to Reopen granted by the Council	10/10/2024
Council 60-day Action – Hold Public Hearing	10/10/2024
Council notification of non-payment of invoices per Regulations of Connecticut State Agencies (RCSA) §16-50v-3	10/18/2024
Date Petitioner submitted payment per Regulations of Connecticut State Agencies (RCSA) §16-50v-3	11/12/2024
Council Interrogatories <ul style="list-style-type: none">• Set One Issued• Set One Responses due	12/17/2024 01/07/2025
Pre-hearing conference via Zoom remote conferencing – 11:00 a.m.	01/08/2025
Deadline for Exchange of Interrogatories between Parties and Intervenor	01/16/2025
Deadline for Pre-filed testimony and responses to interrogatories	01/23/2025
Deadline for State Agency Comments	01/23/2025
Deadline for Municipal Comments	01/23/2025
Deadline to request Party/Intervenor status	01/23/2025
Public Hearing 2:00 p.m. evidentiary session and 6:30 p.m. public comment session via Zoom remote conferencing (refer to Hearing Information section on Petition No. 1592A webpage for Zoom remote conferencing log in/call in)	01/30/2025
Continued Evidentiary Session(s) (if necessary)	TBD
Close of Evidentiary Record	TBD
Deadline for Party and Intervenor Post Hearing Briefs and Proposed Findings of Fact	TBD
Close of Public Comment Period	TBD
Draft Findings of Fact	TBD
Draft Findings of Fact, Opinion & Decision & Order	TBD
Deadline for Final Decision	05/11/2025

Siting Analyst: Robert Mercier

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

Pre-Hearing Interrogatories
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.

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?
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.
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.

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.
6. Referencing Motion to Reopen p. 5, by how many square feet was grading reduced?
7. What is the length of the revised access drive?

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.

Electrical Interconnection

9. Has Eversource reviewed and approved the revised interconnection design?
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?
11. What is the status of the interconnection review by ISO-NE?

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?
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)?
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.
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.

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?
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?

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