

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

PETITION NO. 1598 – Windsor Solar One, 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 3.0-megawatt AC solar photovoltaic electric generating facility located at 445 River Street, Windsor, Connecticut, and associated electrical interconnection.	Petition No. 1598
	January 25, 2024

Petitioner Windsor Solar One, LLC (“WSO” or “Petitioner”) hereby submits the following Interrogatories to the Town of Windsor (“Town”). Please provide your responses to the enclosed questions no later than February 1, 2024. Please submit an original to the office of Pullman & Comley, LLC; 90 State House Square; Hartford, CT 06103 Attn: Lee D. Hoffman and an electronic copy to lhoffman@pullcom.com.

1. Please reference Interrogatory No. 56 issued by the Town to WSO. Were alternative sites within the Town explored for the Amazon site? If so, please describe all efforts the Town required for the alternative sites to be explored by Amazon.
2. Please reference Interrogatory No. 56 issued by the Town to WSO. Do any residences have year-round views of the Amazon facility? Has any landscaping been installed to mitigate views?
3. Please reference Interrogatory No. 56 issued by the Town to WSO. What lighting plan was approved by the Town for the construction of the Amazon facility? Are the lights on throughout the night, or is there a time for lighting shutdown. Approximately how far is this lighting visible?
4. Has the Town ever required the construction of a landscaped berm as a condition of zoning or siting approval for a project located in the Town of Windsor? If so, please describe such berm requirements.
5. If an undulating berm of ten to twelve feet in height were to be constructed at the WSO site, how wide would such a berm need to be in order to ensure a slope of 3:1 ratio or less?

6. Please reference Interrogatory No. 56 issued by the Town to WSO. What is the height of the Amazon facility that was approved by the Town?
7. Please reference Interrogatory No. 56 issued by the Town to WSO. What is the distance of the closest residence to the Amazon facility that was approved by the Town?
8. Please reference Interrogatory No. 56 issued by the Town to WSO. Has the Town ever received any noise complaints regarding the construction and/or the operation of the Amazon facility? If so, please describe those complaints and how those complaints were resolved.
9. Does the Town ever require entities that are seeking zoning approvals in the Town to construct a project to explain whether the entity plans on selling or transferring its project? If so, please describe that process.
10. Has the Town ever ordered an applicant to conduct any studies to determine the economic impact a proposed project may have on abutting property values in the Town of Windsor? If yes, provide describe such studies. If not, why not?
11. Please reference Interrogatory No. 56 issued by the Town to WSO. What wildlife was displaced from the Amazon project that was approved by the Town?
12. Please reference Interrogatory No. 56 issued by the Town to WSO. Were more environmentally friendly alternatives explored for the construction of the Amazon project that was approved by the Town? Please describe such alternatives.
13. Please reference Interrogatory No. 56 issued by the Town to WSO. Did the Town require that Amazon test its construction materials with the Toxicity Characteristic Leaching Procedure (TCLP) testing to determine if the materials would be characterized as hazardous waste at the time of disposal under current regulatory criteria? If so, please submit such information. If not, why not?
14. Please reference Interrogatory No. 56 issued by the Town to WSO. What health concerns were evaluated related to the dust that resulted from Amazon's construction activities and the risks such dust posed to the surrounding residents of the Amazon project?
15. Please reference Interrogatory No. 56 issued by the Town to WSO. What environmental testing did the Town require prior to its approval of the Amazon project?
16. Please reference Interrogatory No. 56 issued by the Town to WSO. How many gallons of fuel or oil in cumulative volume did the Amazon project store above ground during construction? How many gallons of fuel or oil in cumulative volume is being stored by Amazon during operation? Did the Town request such fuel or oil information from Amazon during its approval process? If not, why not?

17. Please reference Interrogatory No. 56 issued by the Town to WSO. Did the Town request information from Amazon regarding hazardous substances that were stored at the Amazon project during construction or operation? If so, please provide such information. If not, why not?

18. Please reference Interrogatory No. 56 issued by the Town to WSO. Did the Town require any decommissioning bond and/or site restoration at the end of the useful life of the Amazon project? If so, please provide information related to the Amazon decommissioning. If not, why not?