

**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
	February 1, 2024

Petitioner Windsor Solar One, LLC (“WSO”) hereby submits the following responses to the Interrogatories that were directed to Lee Hoffman on behalf of WSO by William A. Williams and Jennifer Perry Williams on January 25, 2024.

1. We have found the process for addressing and responding to the Petition to be overwhelming given the timeline and complexity of the matter. The administrative and legal nature of the process adds to the complexity.

WSO believes that is not an interrogatory for which a response is required. WSO will treat this statement as pre-filed testimony and not respond.

2. We are amazed that an area and neighborhood that we have chose to invest in and live based on its character and zoning can be so easily disrupted with so little control. Is this even constitutional?

WSO objects to this question in that it calls for a legal conclusion for which no response is required. To the extent that a response is required, WSO disagrees that a state proceeding in which the Town of Windsor, various residents and other state agencies take an active role in constitutes “so little control.” In addition, WSO states that the Siting Council’s processes are constitutional under both state and federal law.

3. Has the state established minimum standards for locating these types of facilities in residential and agricultural areas? For example, one mile setback for noise and view mitigation?

WSO objects to this question in that it calls for a legal conclusion for which no response is required. To the extent a response is required, WSO states that it is unaware of any standard setbacks

required by the Siting Council for solar PV projects. Formal setbacks are regulatorily required for wind projects only. For solar projects, such setbacks are usually determined on a case-by-case basis.

4. A significant concern is noise mitigation based at least in part on a similar facility installed in East Windsor by Solar One, where there have been complaints by residents and is still in an on-going dispute. Noise is expected from the Inverters and solar panel movement. Do the DEEP minimum decibel standards address the nature of this project and community? We should not be introducing a higher noise level than already exists in this neighborhood. I assume that there will be no noise coming from this facility at night. Is that correct?

As indicated in its Petition, WSO anticipates that the project as proposed will meet all DEEP regulatory requirements related to noise. In addition, noise will not be anticipated to be generated when the sun is not shining. For further information, please see pp. 16 and 17 of the Petition and the Responses to the Siting Council's Interrogatories to WSO, specifically Responses No. 1 and 39 through 41.

5. This location is right on top of a residential area that is adjacent to woodland, the Farmington River and farmland. The area is very quiet and visually stimulating due to its nature setting. It is ideal for a mature population of working families and retirees. We should not interfere with the health benefits of this.

WSO believes that is not an interrogatory for which a response is required. WSO will treat this statement as pre-filed testimony and not respond.

6. We request that a professional landscape architect be retained to professionally design and oversee the installation of boundary screening (berms, plantings, fencing) to minimize impacts to the surrounding residential community. A Management Plan should be prepared to address the minimum 20+ years of expected operation and maintenance. I suggest that the Town of Windsor approve this firm.

WSO believes that is not an interrogatory for which a response is required. WSO will treat this statement as pre-filed testimony and not respond. However, to the extent that a response is required, WSO would note that any approvals of this nature, if they are to be issued, would be issued by the Siting Council, and not the Town of Windsor. Notwithstanding the foregoing, WSO states that a landscape architect has been retained for the project.