

# 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

February 7, 2024

Paul R. Michaud, Esq. Michaud Law Group LLC 515 Centerpoint Drive, Suite 503 Middletown, CT 06457 pmichaud@michaud.law

RE: **PETITION NO. 1599** – TRITEC Americas, LLC notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes §16-50k(e), and petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 0.999-megawatt AC solar photovoltaic electric generating facility located at Parcel No. 30-25-59 Spencer Street, Suffield, Connecticut, and associated electrical interconnection. **Council Interrogatories to Petitioner**.

#### Dear Attorney Michaud:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than February 28, 2024. Please submit an original and 15 copies to the Council's office and an electronic copy to <a href="mailto:siting.council@ct.gov">siting.council@ct.gov</a>. 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 February 28, 2024 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/IN/RDM

c: Service List dated November 15, 2023

# Petition No. 1599 TRITEC Americas, LLC Parcel No. 30-25-59 Spencer Street, Suffield, Connecticut

# Interrogatories February 7, 2024

#### **Notice**

- 1. Has TRITEC received any comments since the Petition was submitted to the Council? If yes, summarize the comments and state how these comments were addressed.
- 2. Referencing Petition p. 3, what comments did the First Selectman have concerning the proposed project?
- 3. Referencing Petition p. 4, how would the Project benefit abutting property owners, the Town of Suffield and the state?

# **Project Development**

- 4. Referencing Petition p. 7, which entity will hold the permit(s)?
- 5. Referring to Petition p. 12, when will the Project be bid into the NRES Program? Would the total capacity of the facility be supplied to the NRES Program?
- 6. If the facility operates beyond the terms of the NRES Agreement, will TRITEC decommission the facility or seek other revenue mechanisms for the power produced by the facility?
- 7. If TRITEC transfers the facility to another entity, would TRITEC 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**

- 8. Submit a map clearly depicting the boundaries of the solar facility site and the boundaries of the host parcel(s). Under Regulations of Connecticut State Agencies (RCSA) §16-50j-2a(29), "Site" means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located.
- 9. What is the length of the lease agreement with the property owner? Describe options for a lease extension, if any.
- 10. 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? If so, please describe and/or provide any such provisions.
- 11. Does the lease agreement with the property owner contain provisions for agricultural co-uses at the site? If yes, describe the co-uses.

- 12. If agricultural co-uses are implemented at the site, who would be responsible for responding to concerns and/or complaints related to these agricultural co-uses? How would contact information be provided for complaints?
- 13. Referencing Petition p. 6, is the host parcel currently farmed by the property owner or by a third party? If by a third party, is this use subject to a lease agreement, and if so, when does the lease expire?
- 14. Referencing Petition page 6, how many acres of the host parcel are zoned residential and industrial?
- 15. Referencing Petition Site Plan 2.11, how many acres of the Project lease area are zoned residential and industrial?
- 16. Referencing Petition Exhibit D, a different site layout is shown in Figure 1. What were the reasons for the re-design of the Project to the proposed layout?

# **Energy Output**

- 17. Referencing Petition p. 9, what electrical loss assumptions have been factored into the output of the facility?
- 18. Was a shade study conducted? Would shading from adjacent forested areas interfere with energy production at the site?
- 19. 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?
- 20. Would TRITEC participate in an ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?

## **Proposed Facility and Associated Equipment**

- 21. Referencing Petition p. 8, how many tracker unit motors would be installed? What is the lifespan of the tracker motors?
- 22. Referencing Petition Exhibit G, p. 2, to what approximate depth would the tracker support posts be driven into the ground?
- 23. How are the tracker motors powered?
- 24. What are the approximate dimensions of the transformer and switchgear that would be installed on the concrete pad adjacent to the proposed access drive? What equipment and its approximate dimensions would be installed on the adjacent small concrete pad?
- 25. Referencing Petition Site Plan 2.11, are the eight inverters mounted on concrete pads or on posts?

#### **Electrical Interconnection**

- 26. Referring to Petition p. 8, what offsite upgrades are required for the electrical distribution system? Does the interconnection require a review from ISO-NE?
- 27. Will the interconnection provide energy to a substation? If yes, which one?
- 28. Referencing Petition Site Plans 2.11, four proposed utility poles are shown; however, three poles are listed in Petition Appendix G, p. 4. Clarify.
- 29. What equipment would be installed on each utility pole? Can the number of poles be reduced by consolidating equipment?
- 30. Referencing Petition Site Plan 2.11, why do the utility poles need to be within 10 feet of each other? Can some or all the utility poles be located farther to the south and west of the access road parking area?
- 31. Referencing Petition Exhibit G, p. 4, it states Eversource does not pad-mount their equipment. Explain.

## **Public Safety**

- 32. What are industry Best Management Practices for Electric and Magnetic Fields at solar facilities? Would the site design conform to these practices.
- 33. Would training be provided for local emergency responders regarding site operation and safety in the event of a fire or other emergency at the site?
- 34. Are there manual facility shut-off switches that can be operated by emergency personnel? If yes, in what location(s)?
- 35. In the event of a brush or electrical fire, how are potential electric hazards that could be encountered by emergency response personnel mitigated? What type of media and/or specialized equipment would be necessary to extinguish a solar panel/electrical component fire?
- 36. Provide an Emergency Response Plan for the proposed facility.
- 37. Referencing Petition p. 9, does the transformer have a containment system in the event of an insulating mineral oil leak? Can the SCADA system detect an insulating mineral oil leak?
- 38. Would the installation of racking posts affect well water quality from construction impacts, such as from vibrations and sedimentation?
- 39. Referencing Petition p. 12, submit the noise study that determined the noise level complies with Department of Energy and Environmental Protection (DEEP) Noise Standards at the nearest property line. Was operation of the tracker motors considered in the noise analysis?
- 40. Referencing Petition p. 12 and the November 16, 2023 comments from the Connecticut Airport Authority, would TRITEC conduct a glare analysis due to the proximity to Bradley International Airport, which is the nearest federally obligated airport?

## **Environmental Effects and Mitigation Measures**

- 41. Referencing Petition Site Plan 3.01- Fence Detail, and Petition Exhibit G, p. 8, can the bottom of the perimeter fence fabric be raised to a height of six-inches above grade to allow for small wildlife movement?
- 42. Referencing Petition Figure 8, what is the acreage of prime farmland soil within the site boundaries?
- 43. Referencing Petition p. 13, it states hay and corn production will continue through the project lifespan. Where on the host parcel and/or facility site will crop production occur? What other agricultural activities are contemplated for the site, if any.
- 44. Referencing Petition Exhibit G, pp. 5-6, provide the distance of the limit of disturbance at its closest point to the two wetlands identified on the host parcel.
- 45. Referencing Petition p. 14, has the Phase IA Cultural Resources Assessment Survey been submitted to the State Historic Preservation Office? If yes, provide a copy of their response, if available.
- 46. Has TRITEC submitted an application for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities to DEEP? If yes, what is the status of such permit?
- 47. Referencing Petition Exhibit H, identify the properties with visible structures in Photos 13 North, 16 North, 21 West, and 22 West.

# **Facility Construction**

- 48. Will blasting be required to construct the site? If not, how will bedrock be removed if encountered?
- 49. Referencing Petition Exhibit G, p. 11, where will the 750 cubic yards of material be disposed of? What would this material be composed of? What is the total estimate of cut and fill?

#### **Facility Maintenance/Decommissioning**

50. Revise the Petition Operations and Maintenance Plan (Exhibit C) to include procedures for pesticide/herbicide use, panel washing, and inspection and replacement of landscaping if die off occurs.