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February 26, 2024

#### VIA ELECTRONIC MAIL AND HAND DELIVERY

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

Re: PETITION NO. 1600 – 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. 30-2-74-40 Chamberlain Highway, Berlin, Connecticut, and associated electrical interconnection. Petitioner Responses to Interrogatories from Council.

#### Dear Attorney Bachman:

On behalf of TRITEC Americas, LLC ("Petitioner"), please accept the enclosed responses to the interrogatories provided by the Connecticut Siting Council ("Council") on February 7, 2024.

Consistent with Council requirements, Petitioner submits an original and fifteen hard copies of all necessary documents.

Please feel free to contact me if you have any questions.

Very truly yours,

Paul R. Michaud

# TRITEC Americas, LLC Parcel No. 30-2-74-40 Chamberlain Highway, Berlin, 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 how they were addressed.

RESPONSE: No, TRITEC has not received any comments since submitting the Petition to the Council.

2. Referencing Petition p. 4, how would the Project benefit abutting property owners, the Town of Berlin and the state?

RESPONSE: The proposed Project would greatly benefit the abutters, the Town of Berlin, and the State. First, the Project would produce clean, carbon-free energy for the electric grid, thus reducing the Town's reliance on fossil fuels and helping to decrease greenhouse gas emissions and combat climate change, contributing to a more sustainable future. Second, it would produce long-term (at least 20 years) stable electricity for the electric grid, which can help lower electricity costs for the town and its residents over the long term. Third, the Project would generate additional revenue for the Town through property taxes and other fees - on the land and equipment. Fourth, the Project would reduce air and water pollution associated with fossil fuel power plants, improving local air quality and protecting natural resources. It would also conserve water, as solar panels do not require water for cooling like traditional power plants. Fifth, the Project could serve as an educational tool for local schools to teach the students about renewable energy, sustainability, and environmental conservation. Sixth, the Project would result in substantial grid improvements in the vicinity of the Project Site, thus resulting in electric grid resiliency for local residents. Lastly, the project would allow the Town to help meet Connecticut's law to achieve 100% carbon-free generation by 2040.

3. Referencing Petition p. 4, which abutting property owner is interested in purchasing a portion of the host parcel from TRITEC? Where is this portion of the host parcel located?

RESPONSE: The abutting property owner located at 2355 Chamberlain Highway, Berlin, CT is interested in purchasing a portion of the host parcel. The portion of the host parcel is located on the northern side of the parcel, opposite the Project Site.

#### **Project Development**

4. Referencing Petition p. 7, which entity will hold the permit(s)?

**RESPONSE:** Petitioner will hold the permits.

5. Would the total capacity of the facility be supplied to the NRES Program?

RESPONSE: Yes, the total capacity of the facility will be supplied to the NRES Program.

6. 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?

RESPONSE: Yes, TRITEC would provide the Council with a written agreement.

#### **Proposed Site**

7. 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.

RESPONSE: The Petitioner directs Council staff to the "Overall Site Layout Plan", Sheet 2.10 in Appendix B of the Petition for a clear depiction of the "Site" which includes the area within the Limits of Disturbance ("LOD") line shown. This area includes a specified boundary, access to the solar facility and electrical interconnection locations.

8. Referring to Petition p. 13, what entity harvests the hay crop?

**RESPONSE:** Stonetrough LLC harvests and bails the hay that is then sold to Matson Farms.

9. 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?

RESPONSE: All concerns and/or complaints related to these agricultural co-uses can be directed to Petitioner's legal counsel, Michaud Law Group, LLC. Petitioner intends to maintain a project website containing pertinent information regarding the Project, including contact information.

10. Referencing Petition page 5 and Site Plan 2.11, why is it necessary to install the proposed solar array perimeter fence four feet from the abutting property line to the east? Can the fence be relocated to the west?

RESPONSE: The proposed solar array fence is located four feet from the abutting property line, as shown on the Site Layout Plan 2.11, to allow for maintenance of the proposed stormwater catchment in the post-construction condition.

#### **Energy Output**

11. Referencing Petition p. 8, what electrical loss assumptions have been factored into the output of the facility?

RESPONSE: The annual losses of 0.5% per year is the median solar panel degradation rate. This degradation rate is industry-standard.

12. Was a shade study conducted? Would shading from adjacent forested areas interfere with energy production at the site?

RESPONSE: No, a shade study was not conducted; however, the adjacent forested areas will not interfere with energy production at the site due to the Project's location and distance to major forested areas.

13. 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?

RESPONSE: The electrical system is isolated by strings of DC circuits that are wired to a Combiner; each DC circuit is protected by Fuses. These fuses will protect other strings within the system and allow the balance of the system to produce. Furthermore, the DC strings connect to separate invertors, these invertors are connected to AC breakers. If the invertor fails it will only affect the DC strings attached to that specific invertor.

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

14. Referencing Petition p. 8, how many tracker unit motors would be installed? What is the lifespan of the tracker motors?

RESPONSE: There are 44 tracker motors with an expected life span of 30 years.

15. Referencing Petition Exhibit F, p. 2, to what approximate depth would the tracker support posts be driven into the ground?

**RESPONSE:** Approximate depth will be 9' to 12' of embedment.

16. How are the tracker motors powered?

RESPONSE: Tracker motors are powered by a low voltage auxiliary panel located at the equipment pad.

17. What are the approximate dimensions of the transformer and switchgear that would be installed on the concrete pad adjacent to the proposed access drive?

RESPONSE: Transformer dimensions are approximately 6' wide by 4' deep and the electrical distribution are 10' wide by 3' deep.

18. Referencing Petition Site Plan 2.11, are the eight inverters mounted on concrete pads or on posts?

**RESPONSE:** Invertors will be mounted on posts.

19. Petition Appendix F contains specification sheets for two different solar panels. Which solar panels would be installed at the site? What solar panel output was used to calculate the generation capacity of the site?

RESPONSE: Tracking Trinasolar TSM-540-DEG19C.20 (540 W) panels will be installed at the site and were used to calculate the site's generation capacity.

#### **Electrical Interconnection**

- 20. Referencing Petition p. 7, what is the status of the interconnection review with Eversource? Does the interconnection require a review from ISO-NE?
  - RESPONSE: Eversource is conducting a distribution study, and Petitioner expects study results by the end of April 2024. It does not require review from ISO-NE.
- 21. Will the interconnection provide energy to a substation? If yes, which one? What off-site upgrades are necessary to facilitate the Project interconnection?
  - RESPONSE: The interconnection will provide energy to the Black Rock 11H substation. Offsite upgrades will be outlined in Eversource's distribution study results.
- 22. Referencing Petition Site Plan 2.11, what equipment would be installed on each utility pole? Can the number of poles be reduced by consolidating equipment?
  - RESPONSE: The equipment on the utility poles is owned and operated by the utility company, this equipment will consist of a manual disconnect switch (GOAB), a recloser and a primary meter. Based on the system design and Utility requirements this is the minimum amount.
- 23. 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 of the access road entrance?
  - RESPONSE: The Site Plan 2.11 has been modified to provide 40-foot spacing between the (3) Eversource-owned utility poles and 30-foot spacing between the (2) customer-owned poles. The poles are placed along the proposed access drive. Ultimately Eversource will dictate the exact details of the interconnection as it pertains to quantity and spacing of poles, however the proposed alignment is based on recent projects of similar size. Enclosed, please see, "Site Layout Plan 2.11."
- 24. Referencing Petition Exhibit F, p. 4, it states Eversource does not pad-mount their equipment. Explain.
  - RESPONSE: Eversource dictates the exact details of the interconnection and equipment. Typically, Eversource does not pad-mount their equipment for solar projects, therefore pole-mount equipment is shown on the Site Plans. It should be noted that underground interconnections are substantially more expensive than above ground and would put the Project's viability at risk.

#### **Public Safety**

- 25. What are industry Best Management Practices for Electric and Magnetic Fields at solar facilities? Would the site design conform to these practices.
  - RESPONSE: Petitioner is not aware of any Best Management Practices for Electric and Magnetic Fields at solar facilities like the proposed Project. The Council's "Best Management Practices for Electric and Magnetic Fields" addresses, "engineering practices for proposed electric transmission lines with a design capacity of 69kV or more" and the proposed Project will interconnect to a distribution line with a design capacity of 13.8kV.

See Connecticut Siting Council, "Best Management Practices for Electric and Magnetic Fields" (Feb. 20, 2014) 2.

26. 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?

**RESPONSE:** Training can be provided to local emergency responders of the facilities operation.

27. Are there manual facility shut-off switches that can be operated by emergency personnel? If yes, in what location(s)?

RESPONSE: Yes, there are multiple means of isolating and shutting of the power to the facility. First is the manual disconnect switch located on the Utility pole, second will be the automatic means located second utility pole and third will be the main breaker located at the equipment pad.

28. 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?

RESPONSE: In the event of a fire or emergency, the Project will be able to be shut down by emergency responders via a physical disconnect switch that will be appropriately labeled pursuant to the requirements of the National Electric Code. Petitioner is not aware of any specific media and/or specialized equipment that is needed to extinguish a fire within the Project. Generally speaking, electrical fires are allowed to burn themselves out, with water being used only on the surrounding areas to prevent the spread of any fire beyond the affected area.

29. Provide an Emergency Response Plan for the proposed facility.

RESPONSE: Petitioner respectfully requests that the Council make the submission of an Emergency Response Plan a condition in Council's Final Decision because the final design of the Project depends on several factors, including any potential changes made by the Council or DEEP through their respective permitting processes.

30. 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?

No, transformers manufactured today use mineral oil. Mineral oil presents no danger to the environment. SCADA cannot sense a leak of fluid.

31. Referencing Petition p. 12, and Appendix G, is the Meriden Markham airport a federally-obligated airport? What is the distance from the site to the airport? Is a glare analysis required for this airport?

RESPONSE: Per Order 5190.2R, dated April 30, 1990, Meriden Markham Airport is a federally-obligated airport. The distance from the site to the airport is approximately 4.7 miles. As provided in Appendix G, the FAA provided, "Determinations of no hazard to air navigation" for the proposed project. A glare analysis has not been requested at this time.

32. Would the installation of racking posts affect well water quality from construction impacts, such as from vibrations and sedimentation?

RESPONSE: It is not anticipated that vibration from any equipment installation will affect the nearby aquifers or groundwater quality. The Project has also been designed such that any overland runoff will be protected from depositing sediment off the site by incorporation of a detailed erosion control plan, included with the site plans.

33. Referencing Petition p. 8, 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?

RESPONSE: A noise study was not prepared for the Project. The noise calculations were prepared using the Inverse Square Law. The tracker motors were not considered in the noise analysis because their noise levels are minimal and would have negligible impacts on the calculations.

34. Will tree removal or grading of the side hill adjacent to the access drive entrance be required to improve traffic sight lines along Route 71?

RESPONSE: A CT DOT Encroachment Permit is required for the proposed access drive to the Facility. In the event the DOT requires tree removal and/or grading to improve sight lines it will be handled during construction.

#### **Environmental Effects and Mitigation Measures**

35. Referencing Petition Site Plan 3.01- Fence Detail, and Petition Exhibit F, p. 11, can the bottom of the perimeter fence fabric be raised to a height of six-inches above grade to allow for small wildlife movement?

RESPONSE: The 7' high chain link fence detail on Sheet 3.01 "Construction Details" has been modified to provide a 6" gap above grade. Enclosed, please see, "Construction Details 3.01."

36. Referencing Petition p. 6, provide a detail sheet that indicates the type, height, and location of proposed plantings.

RESPONSE: There are no proposed plantings on the design plans. Petitioner showed the existing tree line to be cut back as needed around the array.

37. What is the acreage of prime farmland soil within the site boundaries?

RESPONSE: The approximate acreage of prime farmland soils within the Project area (site boundaries) is 1.1 acres.

38. What is the distance of the Metacomet Trail, maintained by the Connecticut Forest and Parks Association, to the proposed site? Would the proposed facility be visible from the trail?

RESPONSE: The distance from the Metacomet Trail to the proposed Facility is approximately 1.25 miles. It is not anticipated that the proposed Facility will be visible from

the trail due to distance and the quantity of large trees, both deciduous and evergreen, between the trail and the Site.

39. Referencing Petition Exhibit F, p. 9, it states no tree clearing will occur. Petition Site Plan 2.31 shows the edge of the existing tree line as occurring along the southwestern portion of the limit of disturbance. Clarify.

RESPONSE: Limited tree clearing along the perimeter of the Project area will be necessary for the installation of the array.

40. Referencing Petition Site Plan 2.21, can the fence line and associated limit of disturbance in the northeast corner of the site be modified to remain outside of the 100-foot buffer and to remain off the steep slope to the extent practical?

RESPONSE: The fence line and associated limit of disturbance in the northeast corner of the Project area has been modified to remain outside of the 100-foot wetland buffer and off the steep slope to the extent practical.

41. Referencing Petition Appendix A, Figure 2, the map shows a wetland within the middle of the Site. Clarify.

RESPONSE: The scaling of Figure 2 was incorrect and has been updated herein. The noted wetland area is associated with the proposed stormwater catchment area in the southeast corner of the Project area. As mentioned in the Environmental Assessment, Appendix F, this area was not determined as part of the field delineation to be wetlands.

42. 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.

RESPONSE: The SHPO response letter is included herein. They have requested the completion of a professional archaeological reconnaissance survey of archaeologically sensitive portions of the area of potential effects associated with the Project prior to construction.

43. Referencing Petition p. 13, the host parcel is an operating hay farm. If additional agricultural couses are pursued, where on the host parcel and/or facility site will agricultural co-uses occur? What agricultural co-uses are contemplated for the site, if any?

RESPONSE: Petitioner is currently analyzing the Project Site and Host Parcel for additional agricultural co-uses, including apiaries, pollinators, grazing animals, and low-lying, shade-friendly crops. The final agricultural co-uses and location of these co-uses will depend on agricultural availability and financial feasibility.

44. 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?

RESPONSE: As the CTDEEP Stormwater General Permit application is intended to include "construction ready" site plans, the Petitioner has not yet submitted this application. The Petitioner intends to apply for this permit in the near future and will submit proof of approval to the Council as a pre-condition to beginning construction of the Project.

#### **Facility Construction**

45. Will blasting be required to construct the site? If not, how will bedrock be removed if encountered?

RESPONSE: No, blasting is not required. If bedrock is encountered the racking posts will be installed with a rock drill to get to the burial depths required. No other major earth work.

46. Referring to Petition Exhibit F, p. 15, where will the 190 cubic yards of material be disposed of? What would this material be composed of? What is the total estimate of cut and fill?

RESPONSE: The estimated 190 cubic yards of cut material would be placed, as needed, around the site to facilitate positive drainage patterns. Note that 190 cubic yards could be spread evenly across the entire Project area at a depth less than 0.3-inches. The material would be composed of topsoil and the immediate 6" beneath it associated with the installation of the gravel access drive. Any excess material that cannot be spread on-site will be removed. The total estimate of cut and fill is 230 CY of cut and 40 CY of fill.

47. Referencing Petition p. 10, what is the status of the geotechnical field investigation? Submit the final report, if available.

RESPONSE: The geotechnical field investigation is being conducted in February 2024. The final report can be submitted, upon request, when it is completed.

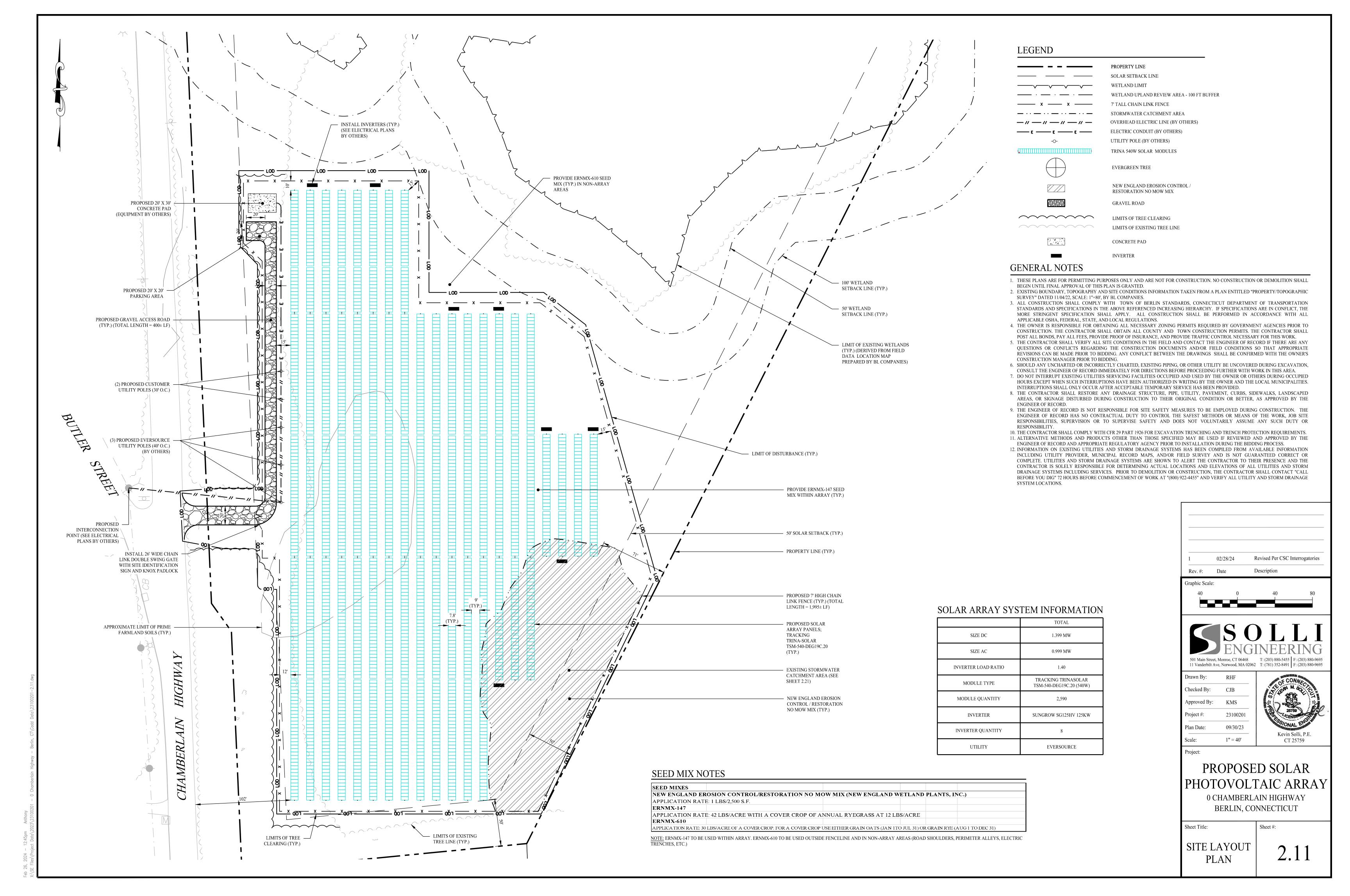
- 48. Referencing Petition p. 9, rock crushing and topsoil screening is mentioned.
  - a) In what areas will bedrock be excavated?
  - b) Where will rock crushing activities occur?
  - c) What is the purpose of topsoil screening?
  - d) Will topsoil be removed from the site?

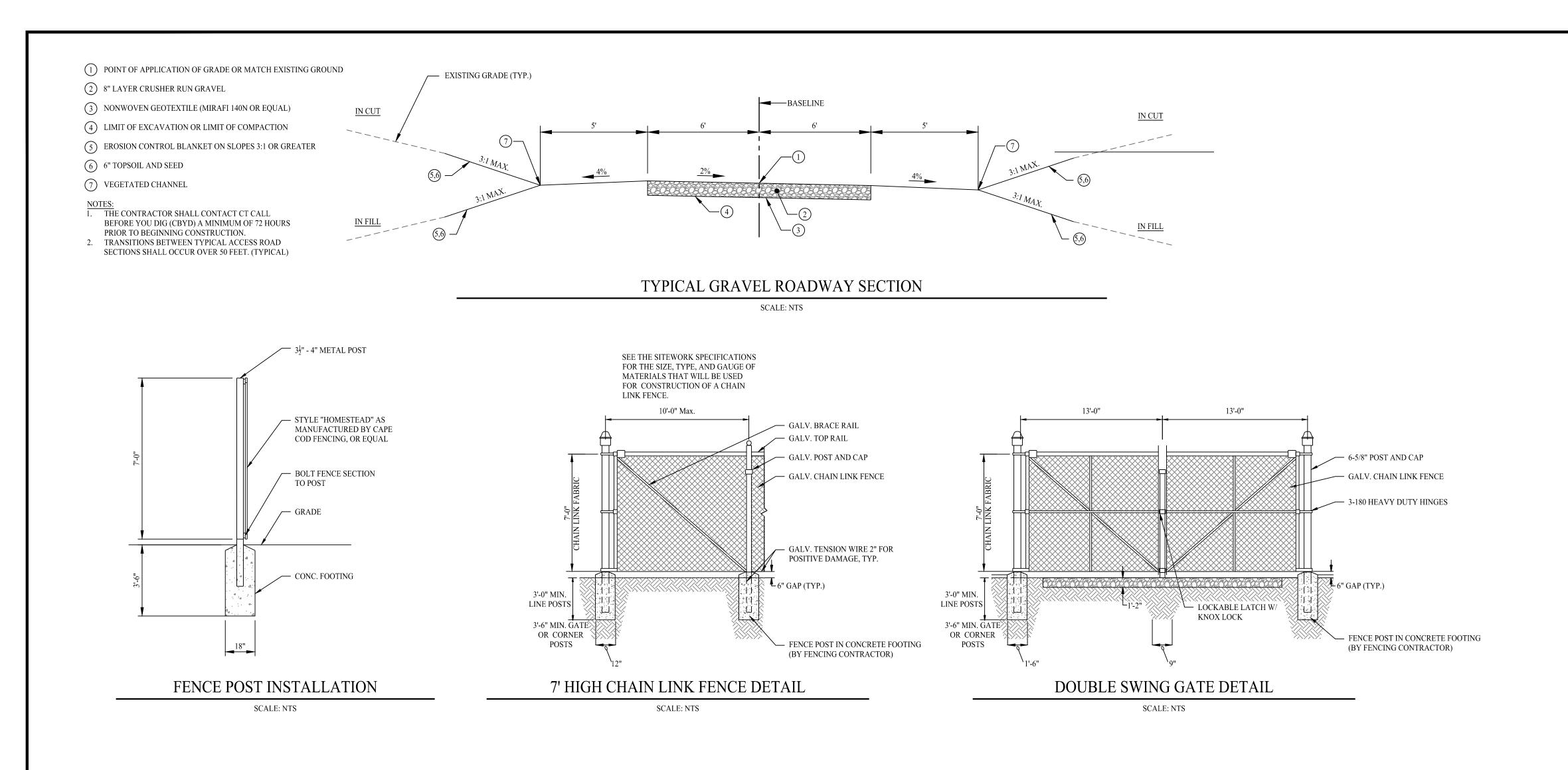
RESPONSE: Bedrock is not anticipated to be encountered on this project, Stripping and cutting of the access road may generate overburden rock that can be crushed in site to facilitate the topping of the new access road. The topsoil from this work will be screened and used to top dress any areas on the site that have been disturbed. No topsoil will be removed from the site.

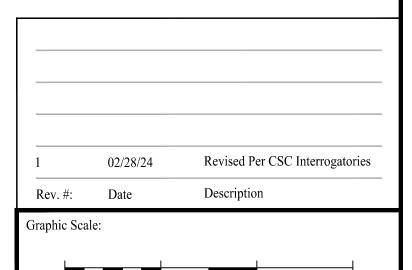
#### **Facility Maintenance/Decommissioning**

49. Revise the Petition Operations and Maintenance Plan (Exhibit C) to include procedures for vegetation maintenance that conform to the DEEP Natural Diversity Data Base letter dated August 31, 2023, pesticide/herbicide use, panel washing, and inspection and replacement of landscaping if die off occurs.

RESPONSE: The Operations and Maintenance Plan has been updated accordingly. Please see enclosed, "Exhibit C: Revised Operations and Maintenance Plan."









Drawn By:	RHF	
Checked By:	СЈВ	
Approved By:	KMS	
Project #:	23100201	
Plan Date:	09/30/23	
Scale:	NTS	

25759

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Kevin Solli, P.E.

CT 25759

Project:

# PROPOSED SOLAR PHOTOVOLTAIC ARRAY O CHAMBERLAIN HIGHWAY

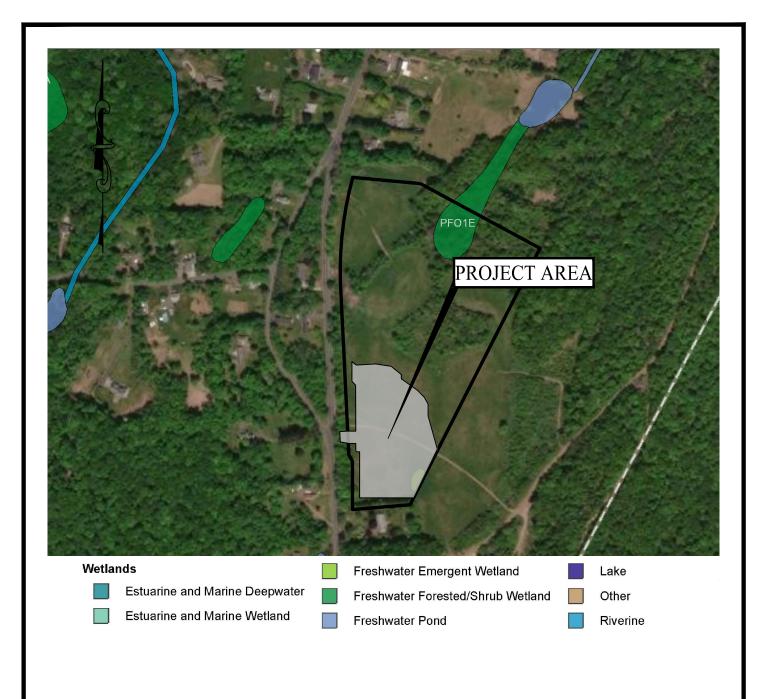
Sheet #:

0 CHAMBERLAIN HIGHWAY BERLIN, CONNECTICUT

CONSTRUCTION

**DETAILS** 

3.01



NOTE: BASE MAP INFORMATION TAKEN FROM U.S. FISH AND WILDLIFE SERVICE NATIONAL WETLANDS INVENTORY





WETLANDS &
WATERCOURSES MAP

0 CHAMBERLAIN HIGHWAY
BERLIN, CONNECTICUT

Project #:	23100201
Plan Date:	09/30/23
Scale:	1" = 500'
Figure:	2

## **State Historic Preservation Office**Department of Economic and Community Development



February 23, 2024

Dr. Gregory F. Walwer
Archaeological Consulting Services
118 Whitfield Street
Guilford, CT 06437
(sent only via email to acsinfo@yahoo.com)

Subject: Cultural Resources Assessment Survey of a Proposed Solar Development

O Chamberlain Highway Berlin, Connecticut

Dear Dr. Walwer:

The State Historic Preservation Office (SHPO) received the technical report prepared by Archaeological Consulting Services (ACS) titled *Phase Ia Archaeological Assessment Survey: Proposed Solar Photovoltaic Array, Chamberlain Highway, Town of Berlin, Connecticut* dated June 2023. Based on the information submitted to our office, the completed investigation meets the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*. SHPO understands that the proposed project will consist of the construction of a new solar facility including an access road and associated infrastructure at the referenced address. Because the project will require approval from the Connecticut Siting Council, it is subject to review by this office pursuant to the Connecticut Environmental Policy Act.

The archaeological assessment survey consisted of comprehensive background research that examined historic maps and aerial imagery as well as previously identified cultural resources in proximity to the Area of Potential Effect (APE) for the project. The survey failed to identify any previously recorded archaeological sites or properties listed on the National Register of Historic Places (NRHP) in the APE. The report concluded that portions of the APE situated within 300 feet of the extant roadway retain the potential to contain intact historic archaeological deposits. As a result, ACS recommended subsurface testing of archaeologically sensitive portions of the APE prior to the initiation of ground disturbing activities. Based on the information provided to our office, SHPO requests the completion of a professional archaeological reconnaissance survey of archaeologically sensitive portions of the prior to construction. All work should be in compliance with our *Environmental Review Primer for Connecticut's Archaeological Resources* and no construction or other project-related ground disturbance should be initiated until SHPO has had an opportunity to review and comment upon the requested survey.

This office appreciates the opportunity to review and comment upon this project. For additional information, please contact Cory Atkinson, Staff Archaeologist and Environmental Reviewer, at (860) 500-2458 or cory.atkinson@ct.gov.

Sincerely,

Jonathan Kinney

State Historic Preservation Officer

### EXHIBIT C

Revised Operations and Maintenance Plan

	O&M Scope	Frequency per Year	Description
1.	General Site Inspection	Varies	<ul> <li>Verify safety and Identification labeling is present and legible. (1x per year)</li> <li>Inspect site access/egress locations are free of obstructions and hazards. (1x per year)</li> <li>Equipment access lanes are free of obstructions and hazards. (1x per year)</li> <li>Inspect site for changes of environmental conditions such as nearby construction activity, agricultural activities, bird migrations, water table changes, acts of vandalism, and shading. (1x per year)</li> <li>Wash panels using non-toxic substances. (As needed)</li> </ul>
2.	Mechanical System Inspection	1x per year	<ul> <li>Racking structures visual and mechanical inspection.</li> <li>Mechanical inspection 2% of Module-to-racking attachments for torque specification.</li> <li>Module visual inspection.</li> <li>DC Optimizer operation verification via monitoring equipment (when applicable).</li> <li>Ballast block, foundations, driven piers, mechanical attachments, and earth screw visual inspection.</li> <li>Roof protection installation methods and materials.</li> <li>Equipment Grounding Conductor electrical continuity inspection.</li> <li>Equipment bonding to ground electrical continuity inspection.</li> </ul>

3.	DC & AC Electrical System Inspection	1x per year	<ul> <li>Verify safety and Identification labeling is present and legible.</li> <li>Enclosure mounting, gaskets, interior, and exterior visual inspection.</li> <li>Grounding and bonding inspection.</li> <li>Terminations (conductors) thermography scanning.</li> <li>Visual inspection of conductor termination torque markings.</li> <li>Fuse and breaker thermography scanning.</li> <li>Vacuum clean interiors.</li> <li>Visual inspection of conduits, fittings, junctions/splice boxes, and enclosures.</li> <li>Exercise operation of all protective devices.</li> <li>Switchgear inspection.</li> <li>Use infrared camera to inspect for hot spots, bypass.</li> </ul>
4.	Inverter Inspection	1x per year	<ul> <li>Verify safety and Identification labeling is present and legible.</li> <li>Enclosure mounting, gaskets, Interior, and exterior visual inspection.</li> <li>Grounding and bonding inspection.</li> <li>Inverter operation verification.</li> <li>Use an infrared camera to check connections.</li> <li>Vacuum clean interior.</li> <li>Clean air intake/exhaust screens, fans, and filters.</li> <li>Complete all other manufacturer specific maintenance procedures not listed above.</li> </ul>
5.	Data Acquisition System Inspection	1x per year	<ul> <li>Verify safety and Identification labeling is present and legible.</li> <li>Meteorological data sensor cleaning, positioning, and operation.</li> <li>Inverter communication (when applicable).</li> </ul>
6.	Reporting	1x per year	<ul> <li>Provide digital commissioning report including results from all steps with responses noting Pass, Values, or Failure with explanation.</li> <li>Photo report of deficiencies.</li> </ul>
7.	Inverter Replacement	As Needed	<ul> <li>Additional site visits related to inverter failure will be billed to Asset Manager on a time and materials basis.</li> <li>Site visits will be followed with a report on site conditions and findings within three (3) business days.</li> </ul>

8.	Testing	1x per year	-	Perform performance test: measure incident sunlight and simultaneously observe temperature and calculate the balance of system efficiency. Compare readings with diagnostic benchmark (original efficiency of system).
9.	Vegetation Maintenance	Varies		Inspect site for vegetation growth or accumulation which could shade arrays and impact PV production (4x per year) Mow, clear, and/or apply herbicides or preemergent (where allowed by applicable laws and regulations) to manage site vegetation. Mowing will be completed at a slow speed, the mower height will be 7-12," and performed in a pattern that allows wildlife to escape the tractor and mower, and equipment will be washed before and after use at the site to prevent the spread of invasive plants. (4x per year during the first 5 years and establishing of the vegetation, but then decrease to 1x per year) Inspect arrays for soiling, evidence of pest infestation, water pooling, vegetation growth, shading or damage (2x per year). Photo-document general condition of each array, noting any corrective actions and location of any issues requiring remediation beyond project manager visit time allocation (2x per year). Inspect site for landscaping die off (4x per year) and replace dead landscaping (As needed).
10.	Stormwater Control Management	As Needed	-	Perform the steps to be outlined in the Stormwater Pollution Control Plan, approved by the Connecticut Department of Energy and Environmental Protection, and in compliance with the 2004 Connecticut Stormwater Quality Manual and 2002 Connecticut Guidelines for Soil Erosion and Sediment Control.