

STATE OF CONNECTICUT *CONNECTICUT SITING COUNCIL* Ten Franklin Square, New Britain, CT 06051 Phone: (860) 827-2935 Fax: (860) 827-2950 E-Mail: <u>siting.council@ct.gov</u> 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. 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. **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 <u>siting.council@ct.gov</u>. 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/RDM

c: Service List dated November 15, 2023

## Petition No. 1600 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.
- 2. Referencing Petition p. 4, how would the Project benefit abutting property owners, the Town of Berlin and the state?
- 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?

### **Project Development**

- 4. Referencing Petition p. 7, which entity will hold the permit(s)?
- 5. Would the total capacity of the facility 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?

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

## **Energy Output**

- 11. Referencing Petition p. 8, what electrical loss assumptions have been factored into the output of the facility?
- 12. Was a shade study conducted? Would shading from adjacent forested areas interfere with energy production at the site?
- 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?

### **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?
- 15. Referencing Petition Exhibit F, p. 2, to what approximate depth would the tracker support posts be driven into the ground?
- 16. How are the tracker motors powered?
- 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?
- 18. Referencing Petition Site Plan 2.11, are the eight inverters mounted on concrete pads or 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?

### **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?
- 21. Will the interconnection provide energy to a substation? If yes, which one? What off-site upgrades are necessary to facilitate the Project interconnection?
- 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?
- 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?
- 24. Referencing Petition Exhibit F, p. 4, it states Eversource does not pad-mount their equipment. Explain.

### **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.
- 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?
- 27. Are there manual facility shut-off switches that can be operated by emergency personnel? If yes, in what location(s)?
- 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?
- 29. Provide an Emergency Response Plan for the proposed facility.
- 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?
- 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?
- 32. Would the installation of racking posts affect well water quality from construction impacts, such as from vibrations and sedimentation?
- 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?
- 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?

#### **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?
- 36. Referencing Petition p. 6, provide a detail sheet that indicates the type, height, and location of proposed plantings.
- 37. What is the acreage of prime farmland soil within the site boundaries?
- 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?

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

#### **Facility Construction**

- 45. Will blasting be required to construct the site? If not, how will bedrock be removed if encountered?
- 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?
- 47. Referencing Petition p. 10, what is the status of the geotechnical field investigation? Submit the final report, if available.
- 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?

#### **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.