



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

February 23, 2024

Kenneth C. Baldwin, Esq.
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RE: **PETITION NO. 1602** – Glastonbury Solar One, LLC and VCP, LLC d/b/a Verogy, 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 17 Wickham Road, Glastonbury, Connecticut, and associated electrical interconnection. **Council Interrogatories to Petitioner.**

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than March 15, 2024. Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. 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 March 15, 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/MP

c: Service List dated December 15, 2023

Petition No. 1602
Glastonbury Solar One, LLC and VCP, LLC d/b/a Verogy, LLC
17 Wickham Road, Glastonbury, Connecticut

Interrogatories
February 23, 2024

Notice

1. Referencing Petition p. 14, has Glastonbury Solar One, LLC and VCP, LLC d/b/a Verogy, LLC (GSO) received any comments since the petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.
2. Referencing page 14 of the Petition, GSO notes that the “Windsor Solar One Project team” met with DEEP Stormwater Division. Was Glastonbury Solar One intended? Please clarify.

Project Development

3. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
4. What is the estimated cost of the project?
5. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?
6. If the facility operates beyond the terms of the Shared Clean Energy Facilities (SCEF) Agreement, will GSO decommission the facility or seek other revenue mechanisms for the power produced by the facility?
7. If GSO transfers the facility to another entity, would GSO 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. 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. 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.
10. What is the length of the lease agreement with the property owner? Describe options for lease extension(s), if any.

11. Does the lease agreement(s) with the property owner contain provisions for agricultural co-uses at the site? If yes, describe these 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 the December 7, 2023 letter from the Department of Agriculture (DOAg), approximately 23.1 acres of the host parcel are currently in fruit production. Is this use subject to a lease agreement, and if so, when does the lease expire? Would the remaining approximately 9.3 acres that are not part of the proposed facility site continue to be used to grow crops post-construction?
14. Is the site parcel, or any portion thereof, part of the Public Act 490 Program? If so, how does the municipal land use code classify the parcel(s)? How would the project affect the use classification?
15. Has the DOAg purchased any development rights for the facility site or any portion of the facility site as part of the State Program for the Preservation of Agricultural Land?

Energy Output

16. Referencing page 4 of the Petition, GSO notes that energy produced by the facility would be sold to Eversource. Has GSO executed a Tariff Terms Agreement (TTA) with Eversource? Would GSO also sell the renewable energy certificates (RECs) to Eversource? Would the TTA include the transfer of capacity to Eversource?
17. Is the project being designed to accommodate a potential future battery storage system? If so, please indicate the anticipated size of the system, where it may be located on the site, and the impact it may have on the SCEF Agreement.
18. 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?
19. Would GSO participate in an ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?
20. Referencing Petition p. 8, have electrical loss assumptions been factored into the output of the facility? What is the output (MW AC) at the point of interconnection?
21. Would GSO construct the facility if the solar array footprint was reduced and/or if the facility design features (ex. row spacing, panel height, etc.) were modified? Explain.

Proposed Facility and Associated Equipment

22. Provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar field perimeter fence, transformer pads, and the proposed access drive.
23. Provide the approximate dimensions of the proposed equipment pads.
24. List the equipment that would be installed on the proposed equipment pads.

25. What is the height and width of the panels from top edge to bottom edge, assuming maximum tilt?
26. Is the wiring from panels to the inverters installed on the racking system? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation maintenance, farming activities or animals?
27. Referencing Petition p. 7, how many tracker unit motors would be installed? What is the lifespan of the tracker motors?

Electrical Interconnection

28. Provide the line voltage of the proposed electrical interconnection.
29. Referencing Petition p. 8, does the Project interconnection require a review from ISO-NE?
30. Would any off-site upgrades to the existing electric distribution system be required (e.g. distribution line upgrades and/or upgrades from single to three phase)? If yes, describe.
31. Petition p. 4 states "... at least 60% of the total capacity of the facility will be supplied to low-and moderate-income customers..." Where will the remaining approximately 40% be supplied?
32. Referencing Petition Drawing C-3.0, four new utility poles are proposed. Approximately how tall would these poles be above grade? Identify the equipment that would be installed on the proposed utility poles.
33. Have there been any discussions with Eversource about using pad-mounted equipment rather than pole-mounted equipment? Provide cost estimates for both an overhead and underground interconnection.

Public Safety

34. Will the project comply with the current Connecticut State Building Code, National Electrical Code and Connecticut State Fire Prevention Code?
35. What are industry Best Management Practices for Electric and Magnetic Fields at solar facilities? Will the site design conform to these practices.
36. Will training be provided for local emergency responders regarding site operation and safety in the event of a fire or other emergency at the site?
37. How would site access be ensured for emergency responders?
38. 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?
39. Could the entire facility be shut down and de-energized in the event of a fire? If so, how?
40. Referencing Petition pp. 16-17, would the results of the acoustical design study be impacted by cumulative noise from the transformers and the panel tracking system? Explain.

41. What noise-generating equipment would be installed at the site? Would such equipment operate at night? Would operation of the proposed facility meet the applicable Department of Energy and Environmental Protection (DEEP) Noise Standards at the nearest property boundary?
42. Referencing Petition p. 17, it states noise sound levels were based on a previously completed sound analysis that determined a combined inverter bank has a calculated sound power level of under 85 dBA. What inverter manufacture/model, and quantity of, were used in the previously completed combined inverter bank analysis?
43. Could the equipment pads (with inverters) be relocated farther to the south to reduce noise impacts near 1238 Hebron Avenue? If yes, indicated where the equipment pads could be located, and provide a noise calculation similar to page 17 of the Petition based on that location.
44. Referencing Petition p. 16, do the transformers have an insulating oil containment system in the event of a leak? Can the remote-monitoring system detect an insulating oil leak?
45. Referencing Petition p. 18, identify the distance/direction of the nearest federally-obligated airport from the proposed site.
46. Are there any water supply wells in the vicinity of the site? If yes, would the installation of racking posts affect well water quality from construction impacts, such as vibrations and sedimentation?
47. Referencing the Sheep Grazing Plan Attached to the December 7, 2023 DOAg correspondence, if temporary electric fence is used at the site to create defined pasture areas within the solar field, what types of safety measures are in place to prevent electric fence shock hazards?

Environmental Effects and Mitigation Measures

48. Referencing Appendix J of the Petition, Visual Impact Study, the view from 85 Glen Place was provided. Provide similar views from 86 and 89 Glen Place.
49. Referencing the December 7, 2023 DOAg correspondence, DOAg recommended an 8-foot tall chain link fence for grazing sheep. Explain why a 7-foot agricultural fence is proposed. Could GSO include an 8-foot tall chain link fence? If so, provide the incremental cost versus the proposed fence configuration.
50. Referencing Drawing C-5.0 of the Petition, an approximately 4 to 6 inch wildlife gap is proposed under the fence, and per the DEEP NDDDB Determination dated October 6, 2023, the eastern box turtle may occur at the proposed site. However, page 2 of the Sheep Grazing Plan dated August 2023 recommends a maximum gap of 1 to 2 inches. Would the proposed 4 to 6 inch gap be compatible with wildlife (e.g. turtle) use and hosting sheep on site? Explain.
51. Referencing page 21 and Appendix H of the Petition, provide an Eastern Box Turtle Protection Plan (EBTPP). Would the EBTPP include the use of erosion and sediment controls that would avoid entangling wildlife? Explain.
52. Will livestock manure affect water quality in the downgradient wetland/watercourse? How can such effects be mitigated?
53. Referencing Petition Appendix F, Phase 1A Survey, page 24, would the James Wright House be impacted by the proposed facility construction? Explain.

54. Referencing Petition p. 19, what is the status of the Phase 1B Cultural Resources survey?
55. Referencing page 18 of the Petition, is Tryon Street (Route 160) a state-designated scenic road? If so, identify the nearest locally-designated scenic road, distance and visibility. Would the proposed facility be visible from Route 160?
56. Provide the distance and direction from the proposed facility to the Meshomasic State Forest (MSF). Describe any visibility of the proposed facility from the MSF.
57. Submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

Facility Construction

58. With regard to earthwork required to develop the site, provide the following:
 - a) Will the site be graded? If so, in what areas?
 - b) What is the desired slope within the solar array areas?
 - c) Could the solar field areas be installed with minimal alteration to existing slopes?
 - d) If minimal alteration of slopes are proposed, can existing vegetation be maintained to provide ground cover during construction?
 - e) Estimate the amounts of cut and fill in cubic yards for the access road(s)
 - f) Estimate the amounts of cut and fill in cubic yards for solar field grading.
 - g) If there is excess cut, will this material be removed from the site property or deposited on the site property?

59. Referencing Petition p. 11, GSO notes that it will apply for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities to DEEP. What is the status of such permit?
60. What is the acreage of the construction limit of disturbance?
61. Has a comprehensive geotechnical study been completed for the site to determine if site conditions support the overall Project design? If so, summarize the results. If not, has the Petitioner anticipated and designed the Project with assumed subsurface conditions? What are these assumed conditions?
62. Would any blasting be required to develop the site or stormwater features?
63. How would the posts (that support the racking system) be driven into the ground? In the event that ledge is encountered, what methods would be utilized for installation?

Facility Maintenance/Decommissioning

64. Referencing Petition p. 11, GSO notes that, "...[T]he daily rotation of the facility's panels allow for any accumulating snow to sheet off." Notwithstanding, if snow were to build up on the panels, could the tracking system detect the snow buildup and move the panels to a near vertical position (or maximum tilt) to allow excess snow buildup to slide off?
65. Would the inverters last the life of the project? If not, at what time interval would the inverters need to be replaced?
66. Would replacement modules be stored on-site in the event solar panels are damaged or are not functioning properly? If yes, in what location?
67. What is the anticipated sequence of construction? During what time of year would each sequence ideally occur? Does this account for possible seasonal construction restrictions due to the presence of protected species?