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May 7, 2024

DELIVERED BY E-MAIL AND HAND DELIVERY

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

Re: PETITION NO. 1609 – 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 250 Carter Street, Manchester, Connecticut, and associated electrical interconnection. **Petitioner Responses to Interrogatories from MARSD.**

Dear Attorney Bachman:

On behalf of TRITEC Americas, LLC (“Petitioner”), please accept the enclosed responses to the interrogatories provided by MARSD on April 18, 2024. The Petitioner submits fifteen hard copies of all necessary documents. Please feel free to contact me if you have any questions.

Very sincerely yours,

Paul R. Michaud

cc: Service List dated April 30, 2024
John F. Sullivan, Attorney for the Town of Manchester
Raymond Welnicki
Rachel and Dana Schnabel
Rosemary Carroll (MARSD)

**Petition No. 1609 TRITEC Americas, LLC
250 Carter Street, Manchester, Connecticut Interrogatories
Submitted by MARSD April 18, 2024**

Project Development /Construction

1. As mentioned in the petition, can you describe what residents can expect in substantial grid improvements as a result of this project?

Response:

The proposed Project improves the electrical grid by reducing stress on the distribution system. The proposed Project is a distributed generation facility that helps spread generation across the grid, thereby reducing the amount of electricity needed to move across the distribution lines. For example, the Manchester 3A substation will receive electricity from the proposed Project (5 miles away). In contrast, the next closest generation facility in the electric utility sector is the Rainbow Hydroelectric Plant (19 miles away). See U.S. Energy Information Administration, “Electricity Data Browser” (last visited April 18, 2024). This reduction in electricity movement reduces energy losses, delays infrastructure upgrades, and extends distribution lines and overall electric grid lifespans, saving money on maintenance, operating, and electricity costs.

2. Who are the contractors that will be working on this Solar Project?

Response:

Horton Electrical Services and Squirrel Enterprises, Inc.

- a. How many years of experience with this scale and type of project do they have?

Response:

HES and SEI have been engaged in building large scale ground mount solar arrays since 2015.

- b. What projects specifically have they completed?

Response:

HES and SEI have constructed projects in Beacon falls, Bethlehem, Putnam, Montville, Bristol, Southington, Waterford, North Haven, Stonington, Fairfield, and North Stonington.

- c. How many projects are currently being run by Tritec in CT?

Response:

Seven.

- d. How do they plan to mitigate community disruptions?

Response:

Disruptions will be limited to minor traffic delays during deliveries to the project.

- e. 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/local through any contract or grant?

Response:

No.

3. Is the same general contractor working on all of Tritec's projects?

Response:

Yes, Petitioner uses the same general contractor for all projects in Connecticut.

- a. What were the project challenges they encountered in similar or large-scale projects and how were they handled?

Response:

The major challenge for the industries has been the procurement of the equipment and parts to complete a project of this magnitude.

- b. How long did issue resolution take?

Response:

These issues are industry wide and have and will be an issue with all construction related projects in the United States.

- c. Is this general contractor familiar with the specific challenges of the 250 Carter St site?

Response:

Yes.

4. Identify all permits necessary for construction and operation and which entity will hold the permit(s)? Does each entity need to sign off on them?

- a. Who will hold each of the permits?

Response:

Please see Petitioner's Response to Council Interrogatories.

5. If there is a change of equipment or product selections (i.e. inverters, panels, insecticides etc.) is the town/state notified of the changes at any time?

Response:

Petitioner will notify regulatory officials if there are any modifications to the approved design drawings.

- a. Is an approval needed if the equipment is different than the existing product being proposed?

Response:

The design engineer will approve and sign off on any equipment changes from the approved design.

- b. Will new permits need to be taken out?

Response:

No.

6. Will the construction vehicles remain onsite during construction?

Response:

Only construction equipment will remain onsite during construction.

- a. Will you be submitting a construction fuel materials storage, refueling and spill response plan?

Response:

Yes, see Petitioner's Late-Filed Exhibits submitted with the Council on May 7, 2024.

7. During construction, where will you dispose of waste during construction?

Response:

Construction dumpsters.

a. Will it be trucked out each day?

Response:

No.

b. Will the tree stumps be removed?

Response:

Yes.

8. Will you be closing the Shenipsit Trail during construction?

Response:

No.

9. Will there be any disruptions to the nearby neighborhoods during installation?

Response:

No.

a. What disruptions do you anticipate during installation? (traffic, additional noise, power disrupted when hooking up to the grid, etc.)

Response:

Minor traffic delays and normal construction noise.

10. If the Solar Project is approved, who will manage ongoing maintenance of equipment?

Response:

Horton Electrical Services

a. Who will manage the upkeep of the area?

Response:

Horton Electrical Services

b. How often does this system need maintenance?

Response:

Biannually

11. What entity will resolve complaints and issues regarding the Solar Project?

Response:

TRITEC Americas, LLC.

a. What are the procedures and response times to resolve the complaints (i.e. noise pollution, etc.)

Response:

TRITEC Americas, LLC will promptly return any call or email.

b. Are there fines if the responsible entity does not respond to complaints in a timely manner and resolve the issue?

Response:

Not known.

c. Is the property owner of 250 Carter St. liable for any construction damage to nearby residential neighborhoods?

Response:

Not known. This is a legal question.

d. Will Tritec or property owner pay for and help remediate damages due to flooding since the petition claims to make drainage better?

Response:

Not known. This is a legal question.

e. If there is a toxic situation or damages from the installation and/or ongoing maintenance, who should the homeowners go to for resolution?

Response:

TRITEC Americas, LLC

- f. Will Tritec or property owner be responsible for our flood insurance premiums if our area becomes a flood zone due to construction?

Response:

Not known. This is a legal question.

- g. Do residents contact Tritec in California or Switzerland if there is a problem?

Response:

TRITEC Americas, LLC located in La Jolla, California.

- h. How long does Tritec plan to manage this facility?

Response:

For the lifespan of the proposed Project.

- i. Who is the asset manager?

Response:

Danilo Nallin.

- j. What is the asset manager role?

Response:

The asset manager manages the assets.

- k. Is the asset manager the point of contact for issues?

Response:

Yes.

12. What happens if Tritec sells this facility?

Response:

TRITEC Americas, LLC intends to own the proposed facility for its entire lifespan.

- a. Are the new owners bound to the agreements of the original project?

Response:

See response to 12 above.

13. What happens if Tritec wants to expand the number of panels?

Response:

TRITEC Americas, LLC does not intend to expand the number of panels.

- a. Does Tritec have to go through the Siting Council?

Response:

If TRITEC Americas, LLC did expand the number of panels, it would need to inform the Siting Council.

- b. Does it need to go through Manchester Planning and Zoning?

Response:

No.

- c. Is it the same process and procedure as today?

Response:

No.

- d. What entity will oversee it?

Response:

Siting Council.

- e. Will residents abutting the Solar Project be notified of the expansion?

Response:

Yes.

- f. Will our local and state elected leadership be notified?

Response:

Yes.

Environmental

14. Will Tritec's installation team report to DEEP the number of dead, injured, or living eastern box turtles during construction, mowing, maintenance, and decommissioning?

Response:

As stated in Exhibit G- Environmental Assessment § 3.5.1 Natural Diversity Data Base, if listed species of turtles, [or any other state-listed species] are identified, the qualified individual will document and report these findings to the CT DEEP in the manner identified within the NDDDB determination letter. If state-listed species are identified by construction personnel other than the qualified individual, all documented sitings will be relayed to the qualified individual for reporting to the CT DEEP. The CT DEEP NDDDB recommends using their CT NDDDB Observations Survey123 portal to report these findings, referencing the NDDDB reference number stated in Appendix B – Ecological Resources.

- a. Will you be doing construction during the mating season in the spring or hibernation in the fall?

Response:

Tree clearing and all site work related with preparing the site for development (i.e. Phase 1) will need to be carried out between July 31 – November 1 to protect the state listed eastern box turtles and federally listed northern long-eared bats. The eastern box turtle’s active season is from April 1 – November 1 and the USFWS DKey states “*To minimize or avoid impacts to the northern long-eared bat, all activities affecting trees should not occur from December 15th to February 15th and April 15th to July 30th.*” This leaves an overlapping window of opportunity that eastern box turtles will be active and northern long-eared bats will not be impacted by tree clearing activity from July 31 – November 1. Tree clearing should begin during this time period. If need be, tree clearing can occur from November 1 – December 15, and from February 16 – March 31 if by November 1, the site has been sufficiently cordoned off during the active season and has been actively searched and surveyed for eastern box turtles during the active season and all individuals potentially encountered have been removed from the site before eastern box turtles enter brumation. See Environmental Notes – Resource Protection Measures on Sheet 3.03 Titled Environmental Notes & Details prepared by Solli Engineering, last revised April 19, 2024 submitted as Petitioner – TRITEC Americas, LLC Exhibits Petitioner

Response to Council Interrogatories, Set One, 4/23/24 for additional details.

- b. Will you be mowing during the nesting season?

Response:

No.

- c. How will Tritec protect the Eastern Box Turtle habitat that needs to be excavated?

Response:

Notes pertaining to the protection of the Eastern Box Turtle can be found on the Environmental Notes & Details Plan Sheet 3.03.

- d. Does the general contractor have experience in handling Endangered animals and Species of Special concerns (i.e. Eastern Box Turtle)?

Response:

Yes.

15. Will erosion at the base of the solar panels happen given the topography of the land?

Response:

The proposed project will utilize solar tracker panels which allow for the panels to rotate throughout the day to follow the path of the sun and increase efficiency. Erosion at the base of the panels is not anticipated as the tilt of the panels will change throughout the day.

- a. What is the outflow direction?

Response:

The site topography (outflow direction) is from east to west across the Project area.

- b. Is this into or towards an existing wetland?

Response:

Most of the runoff associated with the Project area is proposed to be directed into grass-lined swales which discharge into the proposed stormwater basin. The basin will ultimately discharge the runoff in a controlled manner into the wetland area to the west.

- c. How long does it take new water channels to form due to deteriorating tree roots?

Response:

It is not anticipated that new water channels will form due to deteriorating tree roots as the Project area will be seeded with a meadow-style grass cover and all runoff within the Project area will flow into the proposed grass-lined swales and the stormwater management basin.

- d. Has this been taken into account in the plans?

Response:

It is not anticipated that new water channels will form due to deteriorating tree roots as the Project area will be seeded with a meadow-style grass cover and all runoff within the Project area will flow into the proposed grass-lined swales and the stormwater management basin.

- e. Is there any settling expected due to the roots?

Response:

It is not anticipated that settling will form due to deteriorating tree roots will occur as there will be limited compaction in the soils from the construction process and the proposed Project area will be seeded with a meadow-type ground cover.

- 16. Have you seen the current drainage issues on Amanda drive?

Response:

Drainage issues on Amanda Drive have not been witnessed first-hand, however the proposed Project is anticipated to reduce peak discharge rates and runoff volume from existing conditions.

- 17. Will there be a wind study due to the change of landscape?

Response:

A wind study is not required for the proposed Project.

- a. Will it create a wind tunnel?

Response:

It is not anticipated that a wind tunnel will be created as the area surrounding the Project will continue to be wooded.

18. How exactly will this project protect the Urban Core Forest that needs to be clear-cut?

Response:

No encroachment into Core Forest outside of the proposed limit of disturbance is proposed.

19. How will the planned basin improve drainage?

Response:

The proposed stormwater management basin will improve drainage by reducing the peak-flow rates associated with the current Project area by over 50% for all major storm events analyzed. Runoff from the basin will be discharged in a controlled manner whereas in current conditions runoff freely flows from the site.

- a. Will the water basin have ongoing water quality testing to determine if there is any risk of chemical contamination?

Response:

Ongoing water quality testing is not anticipated or required for the proposed Project.

- b. What is the location of the water basin in proximity to the nearest property?

Response:

The proposed stormwater basin is approximately 570 feet from the property located at 141 Amanda Drive, approximately 390 feet from the property located at 274 Blue Ridge Drive and approximately 425 feet from Carter Street.

20. Will water runoff expose the gas pipeline?

Response:

It is not anticipated that runoff will expose the gas pipeline.

21. Will a noise study be done?

Response:

A noise study is not anticipated to be conducted for the proposed Project. Noise calculations were prepared based on the location of the proposed inverters (which

convert DC voltage to AC voltage) and transformers in relation to the nearest adjacent property line. The results of the noise calculations are in accordance with CT DEEP requirements.

- a. Is the proposed buffer sufficient?

Response:

The proposed evergreen buffer was not considered in the noise calculations. The calculations are conservative in that they assume no physical impediments from the noise sources to the surrounding properties.

- b. Has an acoustical engineer been brought in to develop or review the plan?

Response:

An acoustical engineer has not been brought in to develop or review the plan.

- c. What are the procedures and response times put in place for residents if there is noise pollution?

Response:

The questions is vague and thus we must object because do not know how to respond to it.

- d. Are there fines if Tritec does not respond to the complaints within a timely manner?

Response:

Not known.

22. What noise-generating equipment would be installed at the site? Provide noise profile information for all noise generating equipment during site operation.

Response:

Please reference the revised noise calculations included as part of Petitioner's Late-Filed Exhibits submitted to the Council.

23. How many inverters will be used? Will the noise change during different times of day?

Response:

Eight (8) inverters are proposed. It is anticipated that the noise level will be consistent

throughout the day and subside with the sunset.

24. Based on the noise profile information for the selected equipment, what is the collective operational noise level of the equipment at the nearest property boundary?

Response:

It is anticipated that the collective operational noise level of the equipment at the nearest property boundary will be 29.7 decibels.

- a. Does this noise level meet applicable DEEP Noise Standards?

Response:

Yes.

25. Although the engineering firm doing the study for Tritec states that the "dense forest" will block the view of the Project, what happens in the fall and winter when leaves are off the trees?

Response:

There will be seasonal visibility of the proposed Project when the existing deciduous trees lose their leaf cover, however there will be a 7' tall perimeter fence surrounding the Project area as well as a row of evergreen trees to be planted along the eastern edge of the site between the Project area and the abutting residences on Blue Ridge Drive.

Decommissioning

26. How will Tritec return the site to its original condition of forest?

Response:

Petitioner will follow the submitted decommissioning plan.

- a. How does decommissioning the site after 20 years help the community of Manchester in the long run?

Response:

Petitioner removes all equipment two feet deep, but will keep the water retention basins to continue improving stormwater runoff concerns pre-existing on the property.

- b. How will Tritec financially plan for the decommissioning?

Response:

Decommissioning is included in Petitioner's project budgeting process.

- c. Will an escrow account or bond be set up at the time of construction to ensure decommissioning funding will be available in case of bankruptcy?

Response:

Not determined yet.

27. Who will oversee the decommissioning and decide if the plan is sufficient?

Response:

Siting Council.

28. Has Tritec owned more than one of these Projects in CT for over 20 years?

Response:

No.

- a. How long does Tritec own a solar project?

Response:

Through the lifespan of the project.

29. Would project decommissioning include stormwater management features?

Response:

No. See answer to interrogatory 26.a. above.

- a. If yes, how would the stormwater basin be removed?

Response:

See answer to interrogatory 26.a. above.

Electrical

30. What off-site upgrades are necessary to facilitate the Project electrical interconnection?

Response:

Not finalized yet. Eversource determines off-site upgrades.

31. Will lights be added to the gravel path?

Response:

No.

32. Does Eversource or the utility provider need to add new powerlines?

Response:

Yes.

a. Will Eversource or the utility provider be adding a transformer?

Response:

No.

33. Is the electricity being sold only to Eversource?

Response:

Yes.

a. What authority approves the power purchase agreement (PPA) for the facility?

Response:

There is no PPA. It is subject to an Eversource NRES Tariff.

b. Has a PPA with an electric distribution company been executed?

Response:

Response is not applicable.

i. If so, at what alternating current megawatt output?

Response:

There is no PPA.

ii. If not, when would the PPA be finalized?

Response:

See response to interrogatory 33.a. above.

c. What is the length of the PPA? Are there provisions for any extension of time in the PPA? Is there an option to renew?

Response:

See response to interrogatory 33.a. above.

d. If the PPA expires and is not renewed and the solar facility has not reached the end of its lifespan, will Tritec decommission the facility or seek other revenue mechanisms for the power produced by the facility?

Response:

See response to interrogatory 33.a. above.

e. 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 including contact information for the individual acting on behalf of the transferee?

Response:

Yes.

34. If this is a lease agreement with the property owner, are there any provisions related to future intended use of the site?

Response:

No.

a. Does the lease agreement with the property owner contain provisions for agricultural co-uses at the site? If yes, describe the co-uses.

Response:

Yes, but co-uses to be determined later. See Petitioner's response to interrogatories from the Council.

Public Safety

35. In the event of a brush or electrical fire, how are potential electric hazards that could be encountered by emergency response personnel mitigated?

Response:

See Petitioner's response to interrogatories from the Council.

36. What type of media and/or specialized equipment would be necessary to extinguish a solar panel/electrical component fire?

Response:

See Petitioner's response to interrogatories from the Council.

37. Are there procedures in place with state and local emergency response teams to handle fires or damages to the Project?

Response:

See Petitioner's response to interrogatories from the Council.

- a. Will Manchester now be required to fund the fire department to handle these types of fires? Do they need additional special equipment and training?

Response:

Petitioner is unable to respond to this question as it is neither the town nor the fire department, whom make these types of decisions.

- b. In the event of fire, is the Amanda Drive fire hydrant close enough for firefighters to hook up for water? Will there be enough water pressure to pump the water uphill (100 plus feet in elevation)?

Response:

See Petitioner's response to interrogatories from the Council.

38. Is there an alert system if the solar panels or other equipment are damaged by vandalism?

Response:

Petitioner cannot detect vandalism, but they can detect faults that would likely occur during an event.

- a. Who will be alerted?

Response:

Petitioner and Horton Electrical Services.

39. How many hours of sunlight is this location expected to receive?

Response:

Petitioner directs you to the PVWatts Calculator available on the National Renewable Energy Laboratory website (<https://pywatts.nrel.gov/index.php>). It provides the estimated sunlight of any location in the US, including the proposed Project Site.

- a. Will you be testing for hot spots? If so, when?

Response:

We perform testing every 6 months of the entire system.

40. What type of oil is within the transformers and other components?

Response:

Mineral oil.

- a. Do the transformers or other components have a containment system in the event of a leak?

Response:

The system transformer will trip off if the oil leaks. This will generate an alarm in the remote access system.

- b. How are oil leaks detected?

Response:

Petitioner currently does not detect oil leaks as the oil contained is biodegradable.

41. Can you explain why a glare study is not needed?

Response:

Solli Engineering submitted the required information to the Federal Aviation

Administration (FAA) for review. The FAA reviewed multiple sample points to determine whether a potential hazard exists for air navigation. Upon review, the FAA issued a Determination of No Hazard to Air Navigation for all points analyzed and a glare analysis was not required. For more information see Petition Appendix F, FAA Determination.

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

Response:

Based on the CT Department of Health Public Water Supply Map, there do not appear to be any wells downstream of the proposed solar facility. Vibrations from the installation of racking posts are not anticipated to cause any sedimentation release and should result in no disruption to well water flow and water quality. The contractor shall follow the guidelines of the Soil Erosion and Sediment Control Plan for this project, which will minimize the potential impacts on the groundwater and surface water quality for the proposed Site and its surrounding areas.

43. Can you provide an Operations and Maintenance Plan to include procedures for vegetation maintenance, stormwater control inspections and repair, pesticide/herbicide use, panel washing and landscape vegetation replacement?

Response:

This cannot be provided until the project is approved by the Siting Council and final development is completed.

44. How much help with this site will this Solar Project contribute to Manchester's contribution to the CT 100% renewable energy law?

Response:

The proposed Project will produce 2,150,000 kWh in it's first year and 40,997 MWh over 20 years.

45. Page 4 of the petition states: "The Project could serve as an educational tool for local schools to teach the students about renewable energy, sustainability, and environmental conservation.

- a. Can you elaborate? Is Tritec funding educational tools for Manchester?

Response:

We are not intending to fund tools for Manchester, we will make ourselves available

to train and educate members of the community on the system installed.

- b. Why is this a better educational tool than the solar panel installations already present on numerous schools in Manchester?

Response:

It's an additional educational tool that is different and on-site.

- c. Will decommissioning and the limited lifespan of the project be included in the curriculum?

Response:

No.