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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 Rachel and Dana Schnabel.**

Dear Attorney Bachman:

On behalf of TRITEC Americas, LLC (“Petitioner”), please accept the enclosed responses to the interrogatories provided by Rachel and Dana Schnabel 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 by Rachel & Dana Schnabel
April 18, 2024

Notice

1. Petition page 4 purports that "...the Project would reduce air and water pollution associated with fossil fuel power plants, improving **local** air quality..." (emphasis added).

- a. What is the distance from the Project Site to the nearest fossil fuel power plant?

Response:

Studying fossil fuel plans was not in the scope of the petition; therefore we did not examine the subject of the question.

- b. What are the effects on the local air quality from the nearest fossil fuel power plant?

Response:

Studying fossil fuel plans was not in the scope of the petition; therefore we did not examine the subject of the question.

- c. How will the proposed Project quantitatively reduce the air pollution generated by this power plant?

Response:

Studying fossil fuel plans was not in the scope of the petition; therefore we did not examine the subject of the question.

2. Petition page 4 states: "the project would allow the Town to help meet Connecticut's law to achieve 100% carbon-free generation by 2040". In what ways is the Town of Manchester obligated to assist the State in achieving the reduction of the level of emissions of greenhouse gas to a level of zero per cent from electricity supplied to electric customers in the state (Reference CGS §22a-200a(a))?

Response:

Petitioner is not representing the Town. The question would be directed to the Town.

Project Development

3. What factors lead to a reduction in project size from 2MW to 0.999MW?

Response:

We reduced the proposed Project Size based on our meeting with the Town. The Petitioner

made every effort to reduce the size of the proposed Project to limit its footprint and create as much open space on the Host Parcel as possible. Specifically, the proposed Project now only 7.8 acres of land and leaves 33.3 acres of land undisturbed.

Proposed Site

4. How many acres of Farmland of Statewide Importance are within the parcel? How many acres of Farmland of Statewide Importance are within the project Site?

Response:

There are approximately 29.87 +/- acres of Farmland of Statewide Importance within the parcel and 4.61 +/- acres of Farmland of Statewide Importance within the proposed Project Site.

5. Has a sight distance analysis been conducted for the proposed access road from Carter Street?

Response:

No.

Proposed Facility and Associated Equipment

6. Appendix E, Product Information Sheets, references the optional “Q at night” function for the proposed inverters.
- a. Will the inverters be installed with the optional “Q at night” function?
 - b. Will the “Q at night” function be added or enabled at some time after installation?
 - c. If “Q at night” is utilized, how will the increased heat load be safely dissipated?
 - d. How much noise would be generated, at a maximum, by the “Q at night” function?

Response:

Q at Night is not proposed for this Project.

7. What occurs at the end of an inverter’s “operational life”? What is the typical failure mode? What risks are presented when an inverter fails?

Response:

Invertors are checked for efficiency during the biannual inspection and will be replaced if they are found defective. DC voltage will be present if irradiance is present. The invertors’ safety settings will render the Invertor inactive.

8. What are the specifications of the transformer and switchgear selected for this Project?

Response:

The design electrical engineer specified the equipment to meet the standards of the NEC and the utility company requirements.

9. Has a ground potential rise study been performed? What would be the ground fault voltage at the portion of the perimeter fence nearest to the grounding grid?

Response:

No.

10. What methods will be used to detect electrical faults? What technology will be used to mitigate the effects of electrical faults?

Response:

The system monitored by remote access through an access portal that provides real time data.

11. What methods, systems, and sensors will be used to detect smoke and/or fire in, on, or around any of the installed equipment?

Response:

The system is not designed to detect smoke/fire.

Electrical Interconnection

12. Petition page 4 states: "...the Project would result in substantial grid improvements in the vicinity of the Project Site...". What grid improvements will result from the construction and interconnection of the proposed Facility?

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.

13. What will be the above-grade height of any new utility poles?

Response:

Eversource minimum is a 50' pole buried 9' in the ground, therefore 43'.

14. What is the recommended evacuation distance from a fire of a fully-involved photovoltaic installation of this size? How many residential homes are within that evacuation radius?

Response:

This question is for the local fire department to know and decide, not the Petitioner.

15. How many residential properties are within a ¼ mile radius of the photovoltaic panels?

Response:

Approximately 170 residential properties are located within a ¼ mile radius of the photovoltaic panels.

16. What steps will Petitioner take to ensure local preparedness to respond to a fire?

Response:

Petitioner will work with local fire department to train them on the location and access to the system during an event.

17. Has Petitioner had any conversations with the Manchester Fire Marshal? If not, why?

Response:

Petitioner has not had any conversations with the Manchester Fire Marshall yet as it is not part of the permitting process. If the project is to move forward, then Petitioner would meet with the Manchester Fire Marshall to train the department on the location and access to the system during an event and to obtain an electrical permit.

18. What training will be provided to the Manchester Fire Department?

Response:

Petitioner will work with local fire department to train them on the location and access to the system during an event.

19. How will firefighters and fire apparatus access the project Site during an emergency? What is the maximum gross vehicle weight rating that can be supported by the proposed gravel access road?

Response:

The access road is capable of sustaining an 80,000lb vehicle.

20. What is the industry standard for time (in seconds or minutes) from initial detection of smoke or fire in an energy generating facility to notification to emergency services?

Response:

This question is for the local fire department to know and decide, not the Petitioner.

21. What will be done to mitigate lightning strikes?

Response:

The project will meet all electric codes for electrical safety.

22. Exhibit G, page 19 states: “The collective operational noise level of the inverters at the nearest property boundaries would be 29 decibels.”
- a. How was this value determined? Please provide calculations including a list of all assumptions made.
 - b. Why was the decibel level of the transformer and other system components not considered?
 - c. What would the decibel level be at the nearest property line when accounting for all components of the photovoltaic energy generating facility?
 - d. What frequencies of sound will be emitted from each piece of equipment?

Response:

Please reference the revised noise calculations that Petitioner filed with Council on May 7, 2024. The exact equipment to be installed will be based on availability at the time of construction therefore the frequencies of sound to be emitted from each piece of equipment cannot be determined at this time.

Environmental Effects and Mitigation Measures

23. Exhibit C, page 6 states: “The information above and herein demonstrates that the Project will have no **net** increase in peak flows, erosive velocities or volumes, or adverse impacts to downstream properties.” (emphasis added). What are the peak flows of sub-drainage areas 1A and 1B for Existing Drainage Area 1 (EDA-1A and EDA-1B, respectively)?

Response:

Note that Existing Drainage Area 1 is not broken up into 1A and 1B. The proposed drainage area associated with EDA-1 was broken up into two pieces (PDA-1A and PDA-1B). PDA-1A is the area of runoff to be collected via the proposed grass-lined swales and directed to the proposed stormwater management basin whereas P

SDA-1B is the area of runoff to continue to flow overland as it does in existing conditions. PDA-1A and PDA-1B are combined in the analysis and compared to EDA-1. For clarity, the peak flow rates for the two (2) analysis points are as follows:

Storm Event	EDA-1 (cfs)	PDA-1A/1B (cfs)	EDA-2 (cfs)	PDA-2 (cfs)
2-year	12.91	4.09	12.85	12.85
10-year	28.42	12.13	26.55	26.55

25-year	38.73	15.95	35.47	35.46
50-year	46.54	18.55	42.16	42.16
100-year	55.09	27.44	49.46	49.46

24. It was observed that personnel were conducting excavation activities at 250 Carter Street after Petition No. 1609 had been filed. Did such activities include an analysis of soil and groundwater? If so, please provide all field records including any soil characterizations, redoximorphic features observed, infiltration or percolation testing, and evidence of groundwater at the time of the evaluation.

Response:

These records will be available in the Geotechnical Investigation Report that Petitioner is filing with the Council.

25. Appendix B, page 1 of the first letter states: “Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days.” Has an updated letter from the United States Department of the Interior, Fish and Wildlife Service been obtained?

Response:

Yes, an updated Species List and Northern Long-Eared Bat Rangewide Determination Key (DKey) were obtained from the USFWS and are included in the Petitioner – TRITEC Americas, LLC Exhibits Petitioner Response to Council Interrogatories, Set One, 4/23/24. The updated letters from the USFWS are dated April 9, 2024, and therefore are up to date with the Section 7 regulation that the Species List should be verified after 90 days. The results of the updated Species List included a new Proposed Endangered species, the Tricolored Bat (*Perimyotis subflavus*). “Proposed Endangered” species are defined by the ESA as “Any species the Service has determined is in danger of extinction throughout all or a significant portion of its range and the Service has proposed a draft rule to list as endangered. Proposed endangered species are not protected by the take prohibitions of Section 9 of the ESA until the rule to list is finalized.” As such, until the tricolored bat is officially listed, this species is not officially entitled to legal protection under the ESA, and they are not considered when making a determination as to “take.”

26. Appendix B, page 5 of the first letter states: “YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.”

- a. What has been done to determine that the proposed photovoltaic electric generating facility will not have effects on the Northern Long-eared Bat and the Monarch Butterfly?

Response:

The monarch butterfly is a candidate species for protection under the ESA. “Candidate” species as defined by the ESA are “species which the USFWS has sufficient information to propose as endangered or threatened under the ESA, but for which their development of a proposed listing regulation is precluded by other higher priority listing activities.” As such, until the monarch butterfly is proposed for listing, these species are not officially entitled to legal protection under the ESA, and they are not considered when making a determination as to “take”. The tricolored bat is a species proposed under draft ruling by the USFWS to be endangered. “Proposed Endangered” species are defined by the ESA as “Any species the Service has determined is in danger of extinction throughout all or a significant portion of its range and the Service has proposed a draft rule to list as endangered. Proposed endangered species are not protected by the take prohibitions of Section 9 of the ESA until the rule to list is finalized.” As such, until the tricolored bat is officially listed, this species is not officially entitled to legal protection under the ESA, and they are not considered when making a determination as to “take.” The northern long-eared bat is listed as endangered under the ESA. “Endangered” species as defined by the ESA are species “in danger of extinction throughout all or a significant portion of its range.” While the CT DEEP has no record of northern long-eared bat hibernacula within the town of Manchester, to comply with the ESA, the IPaC Northern Long-Eared Bat Range Wide Determination Key (DKey) was utilized to assess whether the project would result in the “take” of northern long-eared bats. The results of the DKey were included as Appendix B of the projects original submission, resubmitted April 9, 2024, and included in the Petitioner – TRITEC Americas, LLC Exhibits Petitioner Response to Council Interrogatories, Set One, 4/23/24. The results of the updated DKey noted that the proposed project is not reasonably certain to cause incidental take of northern long-eared bats. Additionally, no correspondence by the USFWS was received within 15 days of the resubmittal of the IPaC that would indicate if the USFWS’ determination was incorrect.

- b. Has an acoustic survey been completed to determine whether or not the Northern Long-eared Bat is present at the Site?

Response:

Acoustic detection surveys for bat species have not been undertaken. No state-listed bat species were identified by the CT DEEP as having the potential to be present on the subject parcel (as per the NDDB Assessment Letter). Additionally, according to the CT DEEP, no known hibernacula of federally listed bat species (specifically northern long-eared bat), are present within the Town of Manchester. The nearest known hibernacula of northern long-eared bats is located in East Granby, approximately 16 miles northwest of the site. The nearest known summer roost site is located in Salem, approximately 17.5 miles to the southeast of the site. As such, acoustic detection surveys for bat species were not carried out.

- c. Has DEEP performed an acoustic survey in close proximity to the Site within the past 12 months?

Response:

It is unknown if DEEP has performed an acoustic survey in close proximity to the proposed Project within the past 12 months.

27. Exhibit G, page 16, references the role that a “qualified individual” will play in the identification and protection of box turtles at the Site.
- a. Has one or more qualified individuals been designated for this role? If so, what are their qualifications? If not, what are the criteria for selecting qualified individual(s)?
 - b. How often will the qualified individual(s) be present on site?

Response:

A qualified individual has not been retained at this time, prior to the proposed Project’s commencement, we will coordinate with the CT DEEP to select a qualified professional for this role.

28. Has any consideration been made to allow the stone wall to remain intact on the Site?

Response:

The stone wall material will be relocated onsite.

Facility Construction

29. Have current project plans been reviewed for constructability by a construction inspection officer or other individual(s) with similar knowledge of construction of photovoltaic electric generating facilities?

Response:

Yes, we have engaged professional engineers whom specialize in solar development.

30. Is there a chance that more trees would need to be cleared to allow for construction activities?

Response:

No, Petitioner does not anticipate the need to clear additional trees at this time.

Facility Maintenance/Decommissioning

31. Is the cost of recycling the solar panels as part of the decommissioning plan included in the lifecycle cost analysis?

Response:

Yes.