



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

April 2, 2024

Paul R. Michaud, Esq.
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Middletown, CT 06457
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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. **Council Interrogatories to Petitioner.**

Dear Attorney Michaud:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than April 23, 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 April 23, 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,

A handwritten signature in blue ink, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

MAB/RDM

c: Service List dated January 26, 2024

Petition No. 1609
TRITEC Americas, LLC
250 Carter Street, Manchester, Connecticut

Interrogatories
April 2, 2024

Notice

1. Has TRITEC received any comments since the Petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.
2. Referencing Petition p. 3, which Town officials were present at the November 14, 2023, video conference? What specific comments did the Town have concerning the proposed project?
3. Referencing Petition p. 3, how many abutting property owners and residents attended the November 16, 2023 video conference?

Project Development

4. Referencing Petition p. 4,
 - a. by what mechanism would the energy from the proposed facility provide electricity only to the Town of Manchester?
 - b. would the proposed facility produce energy 24/7? If not, how would the proposed facility provide a stable electricity supply for the electric grid.
 - c. what substantial grid improvements would occur in the vicinity of the proposed facility?
5. Referencing Petition p. 5,
 - a. describe how the westward sloping topography benefits the site layout.
 - b. describe how the absence of biological and hydrological conflicts was determined.
 - c. describe how the site will be “preserved.”
6. What alternative site locations were examined, if any?
7. Referencing Petition p. 6, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
8. Referring to Petition p. 11, when will the project be bid into the NRES Program? Would the total capacity of the facility be supplied to the NRES Program? If the project was bid into the program and was selected, what distressed municipalities would benefit from the project?
9. If the facility is not selected in the NRES Program, would TRITEC withdraw this Petition?
10. If the facility operates beyond the terms of the NRES Agreement, will TRITEC decommission the facility or seek other revenue mechanisms for the power produced by the facility?
11. 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

12. 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.
13. What is the length of the lease agreement with the property owner? Describe options for a lease extension, if any.
14. 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.
15. Does the lease agreement with the property owner contain provisions for agricultural co-uses at the site? If yes, describe the co-uses.
16. 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?
17. Referencing Petition p. 12, how does the property owner currently access the host parcel to conduct maple sugaring activities? Is there an existing access off Carter Street and through the wetlands to the interior of the host parcel?
18. Referencing Petition Appendix D, a different site layout than the currently proposed site layout is shown in Figure 1, Sheet SP-1. What were the reasons for the re-design of the site? Did the revised layout result in a reduced capacity?

Energy Output

19. Referencing Petition p. 9, what electrical loss assumptions have been factored into the output of the facility?
20. Was a shade study conducted? Would shading from adjacent forested areas interfere with energy production at the site?

Proposed Facility and Associated Equipment

21. Referencing Petition Exhibit G, p. 2,
 - a. to what approximate depth would the tracker support posts be driven into the ground?
 - b. how many tracker unit motors would be installed?
 - c. what is the lifespan of the tracker motors?
 - d. how are the tracker motors powered?
 - e. at what height above grade are the tracker motors located?
22. What are the approximate dimensions of the transformer and switchgear that would be installed on the concrete pad adjacent to the proposed access drive? What equipment and its approximate dimensions would be installed on the adjacent small concrete pad?

23. Referencing Petition Exhibit G, p. 2, are the eight inverters mounted on concrete pads or on posts?
24. Petition Appendix E 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 proposed facility?
25. Referencing Petition p. 8, define the term “premium modules”.
26. Why are string inverters proposed rather than a single, centralized inverter?

Electrical Interconnection

27. Referencing Petition p. 7, has the Eversource System Impact Study been completed? What was the result?
28. Are any off-site upgrades required for the electrical distribution system?
29. Does the interconnection require a review from ISO-NE?
30. Will the interconnection provide energy to a substation? If yes, which one?
31. Referencing Petition Site Plan 2.11, six proposed utility poles are shown; however, five poles are described in Petition Exhibit G, p. 3. Clarify.
32. 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?
33. Referencing Petition Exhibit G, pp. 3-4, it states Eversource does not pad-mount their equipment. Explain.

Public Safety

34. Referencing Petition p. 11, how does the project comply with industry Best Management Practices for Electric and Magnetic Fields?
35. 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?
36. Are there manual facility shut-off switches that can be operated by emergency personnel? If yes, in what location(s)?
37. 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?
38. What is the distance of the nearest municipal fire hydrant to the proposed facility? What alternative water sources are available to the fire department? How would water be brought to the site in the event of a fire?
39. Would firewater or other runoff from a solar panel/electrical fire be considered hazardous and require cleanup by a hazardous materials response contractor?

40. If a brush or electrical fire occurred at the proposed facility, how would the fire be contained? What protections are in place to ensure a fire does not impact the natural gas pipelines within the easement on the host parcel?
41. Provide an Emergency Response Plan for the proposed facility.
42. Referencing Petition p. 9, does the transformer have a containment system and/or a low oil level alarm in the event of an insulating mineral oil leak? Can the SCADA system detect an insulating mineral oil leak? Is the mineral oil biodegradable?
43. Would the installation of racking posts affect well water quality from construction impacts, such as from vibrations and well water sedimentation?
44. What is the noise profile of the selected transformer?
45. Referencing Petition Exhibit G, p. 19, submit a detailed sound level calculation work sheet or a sound study that accounts for noise levels from the proposed eight inverters and transformer at the nearest abutting property line.

Environmental Effects and Mitigation Measures

46. Referencing Petition p. 4, what specific CT DEEP and US Army Corps of Engineers requirements will be followed?
47. Referencing Petition Site Plan 2.31, Note 1, is the preliminary design of the Project at least 50 percent complete? If not, would construction comply with the *Connecticut Soil Erosion and Sediment Control Guidelines* and *Connecticut Stormwater Quality Manual*, effective March 30, 2024?
48. Referencing Petition Exhibit G, p. 12, describe the Stream Crossing Best Management Practices to be employed at the site.
49. Referencing Petition Exhibit G, p. 12, does the proposed 42-inch diameter high-density polyethylene pipe conform to the DEEP Inland Fisheries Division Stream Crossing Guidelines? Explain.
50. Can an open bottom culvert be installed at the proposed stream crossing?
51. Referencing Petition Exhibit G, p. 12, how was it determined the main function of the stream is solely water conveyance? What other attributes were assessed?
52. Do wildlife and plant species typically use wetlands and watercourses as travel corridors? If yes, how will the proposed stream crossing affect movement?
53. Referencing Petition Site Plan 3.01- Fence Detail, can the bottom of the perimeter fence fabric be raised to a height of six-inches above grade to allow for small wildlife movement?
54. What agricultural activities are contemplated for the site, if any?

55. Referencing Petition p. 5, it states the project site does not contain prime farmland soils; however, Petition Exhibit G, p. 18, states the project site contains some prime farmland soils. Clarify.
56. Has the Phase IA Cultural Resources Assessment Survey been submitted to the State Historic Preservation Office for comment? If yes, provide a copy of their response, if available.
57. 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?
58. The U.S. Fish and Wildlife Service's Information, Planning, and Conservation System (IPaC) review documentation appears incomplete. For example, the Project Questionnaire portion of the review has no information. Explain.
59. Referencing Petition Exhibit G, p. 10, quantify the acreage of small core forest that would remain after construction.
60. Referencing Petition Exhibit H, identify the addresses of the properties with visible residences in Photos 7 East, 8 East, 9 East, 10 East, 19, and 21 East.

Facility Construction

61. Will blasting be required to construct the site? If not, how will bedrock be removed if encountered?
62. Referencing Petition Exhibit G, p. 11, where will the 3,500 cubic yards of material be disposed of? What would this material be composed of? What is the total estimate of cut and fill?

Facility Maintenance/Decommissioning

63. Under what circumstances would pesticide and/or herbicides be used at the site? What specific precautions are taken for use of these products to prevent effects on water quality and human health?
64. What cleaning agents would be used for panel washing? How often would panels be cleaned?