

263 Blue Ridge Drive  
Manchester, CT 06040

April 18, 2024

Paul R. Michaud, Esq.  
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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. **Intervenor Interrogatories to Petitioner**

Dear Attorney Michaud:

The undersigned requests your responses to the enclosed questions on or before the deadline specified by the Connecticut Siting Council's schedule for the above-referenced proceeding.

Sincerely,

Rachel & Dana Schnabel



Rachel Schnabel, PE  
[RMDSchnabel@gmail.com](mailto:RMDSchnabel@gmail.com)



Dana Schnabel  
[Dana.M.Schnabel@gmail.com](mailto:Dana.M.Schnabel@gmail.com)

c: Service List dated January 26, 2024

**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?
  - b. What are the effects on the local air quality from the nearest fossil fuel power plant?
  - c. How will the proposed Project quantitatively reduce the air pollution generated by this power plant?
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))?

**Project Development**

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

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

**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?

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?
8. What are the specifications of the transformer and switchgear selected for this Project?
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?
10. What methods will be used to detect electrical faults? What technology will be used to mitigate the effects of electrical faults?
11. What methods, systems, and sensors will be used to detect smoke and/or fire in, on, or around any of the installed equipment?

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

### **Public Safety**

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?
15. How many residential properties are within a ¼ mile radius of the photovoltaic panels?
16. What steps will Petitioner take to ensure local preparedness to respond to a fire?
17. Has Petitioner had any conversations with the Manchester Fire Marshal? If not, why?
18. What training will be provided to the Manchester Fire Department?
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?
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?
21. What will be done to mitigate lightning strikes?
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?

### **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)?
- 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.
- 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?
- 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?
  - b. Has an acoustic survey been completed to determine whether or not the Northern Long-eared Bat is present at the Site?
  - c. Has DEEP performed an acoustic survey in close proximity to the Site 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?
- 28. Has any consideration been made to allow the stone wall to remain intact on the Site?

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

### **Facility Maintenance/Decommissioning**

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