

July 30, 2024

VIA ELECTRONIC DELIVERY

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

RE: Petitioner #1611 -- LSE Scutum LLC & LSE Bootes LLC ("Lodestar") for a Declaratory Ruling that No Certificate of Environmental Compatibility and Public Need is Required for the Construction, Operation and Maintenance of Solar Photovoltaic Facility in Enfield, Connecticut

Dear Attorney Bachman:

In connection with the above-captioned petition, please find the original and fifteen (15) copies of petitioner LSE Scutum LLC & LSE Bootes LLC's late file responses to the Public Hearing held by the Council on May 2, 2024. Please contact me directly if you have any questions.

Sincerely,

Carrie L. Ortolano

Carrie L. Ortolano General Counsel

Enclosures

STATE OF CONNECTICUT SITING COUNCIL

PETITION OF LSE SCUTUM LLC and LSE BOOTES LLC PETITION NO. 1611
FOR A DECLARATORY RULING
THAT NO CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED IS REQUIRED FOR THE CONSTRUCTION, OPERATION, AND MAINTENANCE OF A 1.93 MW AC SOLAR PHOTOVOLTAIC FACILITY IN ENFIELD, CONNECTICUT

July 30, 2024

INTRODUCTION

The Petitioner has carefully considered all feedback from the Public Hearing and Public Comment Session held on May 2, 2024. In response, the Site Plan and associated exhibits have been revised to address and accommodate numerous requests. The system size will remain the same, 1.93 MW AC. The limit of disturbance of the revised site plan is 11.61 acres, which decreased from the original 12.10 acres. Further detail on the specific changes is provided below.

NOISE

To mitigate noise concerns, the Petitioner has transitioned the solar design from a tracker to a fixed tilt system. Unlike trackers, which utilize drivetrain motors causing noise emissions, the fixed tilt system operates silently without such components. Furthermore, both equipment pads have been relocated away from property lines and residences along Town Farm and Abbe Road, as requested by the Council. This strategic adjustment aims to significantly diminish noise levels experienced at neighboring property lines and residences. A revised Site Plan is found in Exhibit 1 and a revised noise analysis is found in Exhibit 2.

ACCESS ROAD

Participants at the Public Hearing raised questions about eliminating the access road from Abbe Road. The Petitioner clarified that full elimination was not feasible due to Eversource's

requirement for the point of interconnection for the northern array to be located there.

Additionally, Eversource requires access to their electrical equipment at that location.

Nonetheless, the Petitioner did reduce the length of this access road in the revised Site Plan. This access road will be used exclusively by Eversource to service the interconnection equipment off of Abbe Road, and will not be used to access the site. The site and both arrays will be accessed via Town Farm Road.

VISUAL SCREENING

In response to visual concerns raised by abutters, the Petitioner revised the screening plan by introducing additional vegetation along Town Farm Road and the southern side of the access road off Abbe Road. Furthermore, the height of the trees was adjusted upward from 4-5 feet to 6-7 feet, enhancing the effectiveness of the visual screening. Exhibit 4 contains a revised screening plan.

SITE SELECTION

The Council had requested information concerning the Petitioner's site selection process. To begin, Petitioner focused its site search on parcels of land that are of sufficient size to host a facility. Second, Petitioner reviewed Eversource Energy's publicly available information to determine if a facility is feasible to interconnect to Eversource's distribution system. Third and importantly, because the DEEP has articulated a preference for solar development on Brownfields sites, Petitioner reviewed the statewide list of such sites, a copy of which is attached hereto as Exhibit 3. In addition, as part of Petitioner's consideration of alternative sites, Petitioner reached out to the Town of Enfield officials to receive feedback from the Town and review of any alternative sites suggested by the Town. For this Project, Petitioner sent no less than twenty-four (24) emails to Town officials and, additionally, presented the Project plans to

the planning and zoning commission on October 12, 2024. As of the date hereof, Petitioner has not received any alternate site suggestions from the Town.

OTHER CONSIDERATIONS

Per the Council and Town's request, the Petitioner added a spill incident report form to the operations and maintenance plan (<u>Exhibit 6</u>), and submitted final copies of the Phase 1B report to SHPO (<u>Exhibit 5</u>).

CONCLUSION

The Petitioner has diligently developed innovative solutions to address the feedback and concerns raised by the Siting Council, the Town of Enfield, and its residents. The revised site plan aims to mitigate any potential noise and visual concerns while reducing the overall limit of disturbance. The Petitioner respectfully submits this enhanced plan to showcase Lodestar's commitment to engaging with the community and finding practical solutions.