PETITION OF LSE SCUTUM LLC AND LSE BOOTES LLC ("LODESTAR ENERGY") 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

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STATE OF CONNECTICUT SITING COUNCIL

PETITION OF LSE SCUTUM LLC and LSE BOOTES LLC 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

PETITION NO. _____

February 8, 2024

I. INTRODUCTION

Pursuant to Conn. Gen. Stat.§§ 4-176 and 16-50k(a) and Conn. Agencies Regs. § 16- 50j-38 *et seq.,* LSE Scutum LLC and LSE Bootes LLC, both Connecticut limited liability companies (collectively "Lodestar" or "Petitioner") requests that the Connecticut Siting Council ("Council") approve by declaratory ruling the location, construction, operation, and maintenance of a solar photovoltaic facility capable of up to 1.93 MW AC, and associated equipment ("Project") occupying a total of approximately 10.15 acres of fenced-in solar panels. The Facility is a single-axis tracker system. There are two arrays, which have received two separate Non-Residential Renewable Energy Solutions ("NRES") tariff agreements. Because the two (2) arrays are on adjacent properties, they will be constructed together, will be in the same fenced area, and the Petitioner is filing both arrays under one petition. The southern array ("Array 1") is associated with LSE Scutum LLC and the northern array ("Array 2") is associated with LSE Bootes LLC.

The total Site spans about 12.10 acres (inclusive of solar panels, transformers, electrical switchgear, monitoring equipment, and access roadways) to be constructed on three (3) parcels on the east side of Abbe Road and north side of Town Farm Road in the Town of Enfield that total approximately 15.82 acres (the "Property"). Array 1 is located at 141 Town Farm Road (assessor ID number 86-321) is 9.04 acres and will be accessed off Town Farm Road. Array 2

consists of two parcels both located on Abbe Road (assessor IDs 86-326 and 86-164), are 3.39 acres each and will be accessed off of Abbe Road. For ease of reference, the overall Site address will be referred to as 141 Town Farm Road, Enfield, Connecticut. The Site interconnection and vehicular access to Array 1 will extend north from Town Farm Road with a secondary interconnection and vehicular access to Array 2 extending east of Abbe Road. Currently, the southern portion of the Property is an agricultural field and the northern portion of the Property is a hay field.

Conn. Gen. Stat. § 16-50k(a) provides:

> Notwithstanding the provisions of this chapter or title 16a, the council shall, in the exercise of its jurisdiction over the siting of generating facilities, approve by declaratory ruling... the construction or location of any customer-side distributed resources Project or facility or grid-side distributed resources Project or facility with a capacity of not more than sixty-five megawatts, as long as such Project meets air and water quality standards of the Department of Energy and Environmental Protection.

The energy is being sold through a net metering agreement to the City of Hartford at a discount to offset their energy costs. This is the third project with the City of Hartford and is being championed by Mayor Luke Bronin and Paul Drummey, Director of Operations, as part of the city's renewable energy initiatives.

As discussed in this petition, the Petitioner's goal is to design an environmentally compatible Project that produces the maximum amount of energy while avoiding and minimizing adverse environmental impacts. Based on the information presented herein, the Project will not have a substantial adverse environmental impact to the immediate and surrounding area. Accordingly, the construction, operation, and maintenance of the Project satisfies the criteria of Conn. Gen. Stat. § l6-50k(a).

II. PETITIONER

Lodestar is a Connecticut-based limited liability company that develops renewable energy projects in Connecticut and across New England. Lodestar's principal place of business is located in Avon, Connecticut at 40 Tower Lane, Suite 201. Lodestar will lead the Project's development, construction and financing and plans to be the long-term owner and operator of the Project. Lodestar has worked with utilities, school districts, cities, housing authorities, counties, private businesses, commercial and governmental clients to develop more than 125 MW of solar projects with a value of more than $350 million across the Northeastern United States including ten (10) projects in Connecticut including two recently approved by the Council (petition #1557 and petition #1544).

Please address all correspondence and/or communications regarding this Petition to:

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III. PROPOSED PROJECT

A. PROJECT BACKGROUND

In developing this Project, the Petitioner has taken into account the State's energy policy and goals to "develop and utilize renewable energy resources, such as solar and wind energy, to

the maximum practicable extent." Conn. Gen. Stat. § 16a-35k. As a solar development, the proposed Project is considered a Class I renewable energy source under Conn. Gen. Stat. § 16-1(a)(26).

The Project, upon approval, will participate in the statewide Non-Residential Renewable Energy Solutions ("NRES") Program. The Non-Residential Solar Renewable Energy Solutions (NRES) program is a successor program to the Low Emission Renewable Energy Credit and Zero Emission Renewable Energy Credit (LREC/ZREC) and Virtual Net Metering (VNM) programs with the objectives to foster the sustained, orderly development of the state's Class I renewable energy industry and to encourage the participation by customers in underserved and environmental justice communities, among others. Lodestar has been awarded six contracts under the NRES Program across the first two years, including the Project. NRES Plays an important role in the renewable energy goals by the State of Connecticut by providing the benefits of the clean renewable energy in the form of on bill-credits to state, agricultural, or municipal customers, generating substantial savings for such entities over a 20-year term.

B. SITE SELECTION

Lodestar and its experienced development team have designed the proposed development on the Project Site to minimize or avoid any potential environmental impacts. Those criteria included:

- Location suitability (size, topography, and apparent lack of biological and hydrological conflicts in initial fatal flaw screening);
- Proximity of existing electrical infrastructure, capacity within the distribution system and the approval to interconnect to this infrastructure from EDC;

- Maximizing the site benefits, including utilizing disturbed areas and minimizing the tree removal required.

On September 14, 2023, Petitioner attended a pre-application meeting with the Department of Energy and Environmental Protection ("DEEP"). During this meeting, DEEP staff requested that the petition register the stormwater swale with DEEP once constructed and recommended to seed the fields right away once the harvest is complete to ensure a stronger vegetation before installation of the solar panels begins. The Petitioner will comply with both requests.

As noted above, the Project will be part of the NRES program through Eversource. During the site selection and evaluation process, Lodestar has retained the following consultants to assist in the evaluation and design of the Project:

- J.R. Russo & Associates, LLC - civil engineering and stormwater design
- Vanasse Hangen Brustlin, Inc. ("VHB") – environmental assessment
- Heritage Consulting – archeological consulting
- ArcDesign – interconnection design and medium voltage analysis

C. PROPERTY DESCRIPTION

The Project will occupy ±12.10 acres. There will be two separate points of interconnection and vehicular access roads for each array. Array 1 will be interconnected and accessed north of Town Farm Road. Array 2 will be interconnected and accessed east of Abbe Road. The Property's existing topography ranges from approximately 126 feet above mean sea level ("AMSL") to 157 feet AMSL. Grades within the Site area generally slope North to South, with ground elevations ranging from approximately 126 feet AMSL to 153 feet AMSL. The surrounding area includes a mix of farming and residential development.

D. PROJECT DESCRIPTION

If this Project is approved by the Siting Council, Lodestar will proceed to construct, operate, and maintain the solar facility at the Project Site. Upon its completion, the solar electric energy generating facility (the "Facility") will consist of two (2) arrays with a total of 4,702 photovoltaic modules ("panels") and associated equipment. A single-axis tracker racking system will be used to secure the panels. The Project will also require two (2) electrical service interconnections that will extend from the existing Eversource distribution system along Town Farm Road and Abbe Road. As required by Eversource, the Facility will utilize a series of four (4) new utility poles off of Town Farm Road extending north to Array 1 and a second series of four (4) utility poles off of Abbe Road extending east to Array 2. From there, the connections will run underground to the respective central equipment pads. Construction of the Project will require 0.19 acres of tree clearing. Once complete, the Facility will occupy approximately 10.15 acres inside the fence, with an additional 1.95 acres of improvements beyond the fenced limits, for a total Project area of ±12.10 acres. The seven-foot security fence will be raised six (6) inches off the ground to allow for animal migration. Emergency access will be available via Town Farm Road and Abbe Road and will be designed in accordance with local requirements to accommodate emergency vehicles and fire trucks.

The photovoltaic panels will be mounted on a driven post racking system. The system will be an east-west single axis tracker, with a maximum angle of 60 degrees East-West to maximize energy production. The maximum height of the panels will be approximately (10) feet. The image below is an example of the type of panels and racking system that will be utilized.

Inverters will be mounted at the two centralized pad locations, where small concrete pads will also be installed for transformers and switchgear. At the end of the operational life of the Project, Lodestar will remove all equipment (*e.g.* racking system, panels, inverters, electrical collection system, equipment pads, etc.) from the Project Site, will recycle all recyclable materials, and will dispose of all non-recyclable materials in accordance with applicable law.

Lodestar will install the Project in the area shown on the Site Plans in **Exhibit 1**. The image below is an example of a similar solar array field installed by the Petitioner.

The Project construction period is estimated to take approximately 6-9 months from issuance of all required permits, due to the required growing season between periods of disturbance. Subject to regulatory approval, Petitioner anticipates commencing construction in Q1 2025or upon approval from the Siting Council.

Project Schedule:

Task	**Approximate Duration**
Mobilization and site preparation	2 weeks
Civil work: road construction,	4-8 weeks

tree clearing, grading and stormwater controls	
Site Stabilization	8-12 weeks
Racking, panel & electrical installation	8 weeks
Interconnection and medium voltage	3 weeks
System testing	1 week
Approvals & commissioning	2 weeks

E. UTILITIES AND INTERCONNECTION

Lodestar proposes interconnecting the Project to an existing 23 kV overhead circuit that runs along Town Farm Road on the southern edge of the Property and Abbe Road on the western edge of the Property, which is part of Eversource's distribution system. Lodestar previously completed two interconnection applications and has executed impact study agreements for a study of the local grid capacity. Completion of the interconnection impact studies has resulted in approval to move forward with an interconnection services agreement, which will allow the Project to interconnect in the manner set forth above.

Eversource's interconnection of Array 1 will require the installation of four (4) new poles extending from the existing utility pole, located in the vicinity of the southern end of the

Property on Town Farm Road as depicted in **Exhibit 1**. Eversource's interconnection of Array 2 will require the installation of four (4) new poles extending from the existing utility pole, located in the vicinity of the western end of the Property on Abbe Road as depicted in **Exhibit 1**. Eversource will own and install an angle pole for the first new pole, a pole-mounted recloser on the second new pole, and an overhead primary metering cluster on the third new pole. The point of common coupling (POCC) will be on the load side of the primary metering cluster. The extension will follow the path of the access road with poles installed adjacent to the access road on its south side. Lodestar will install a single riser pole with a load break and fuse cutouts and will direct the interconnection circuit underground. Lodestar will install an underground 3-phase 23 kV line running approximately 75 feet from the point of common coupling/riser pole to the pad mounted switchgear at the Site area. This is the same process and configuration that has been used on all of Lodestar's previous projects across Connecticut.

F. LOCAL INPUT & NOTICE

Lodestar has actively sought input from the Town of Enfield and remains committed to providing the Town with as much information regarding the Project as possible. Lodestar met with the Enfield Planning and Zoning Commission on October 12, 2023 to share the site plan. The Town had general questions regarding the layout and the process but did not have any specific requests.

Additionally, as required by the Regulations of Connecticut State Agencies § 16-50j-40(a), Lodestar provided notice of this petition to all required persons and appropriate municipal officials and governmental agencies. Attached as **Exhibits 5 and 6** are copies of the certifications of service to abutters and required officials respectively.

IV. EQUIPMENT AND ENERGY PRODUCTION

The design of the Project focuses on maximizing the efficiency of the system based on existing conditions of the Site and local weather patterns while, at the same time, minimizing environmental impacts. The array layout was chosen to maximize the use of the open field portions of the Site. Within this layout, approximately 4,702 photovoltaic modules will be installed flat on Single Axis Trackers with an axis azimuth of 180 degrees south. The tracker configuration will involve a single module in portrait orientation and have a tracking angle up to 60 degrees in the East-West direction achieving a maximum height of approximately ten (10) feet at full tilt. Array 1 will feed twelve (8) Solectria XGI 1500-166/166 inverters and Array 2 will feed four (4) Solectria XGI 1500-150/166 inverters for a total output of approximately 1.93 MW AC.

Eversource reviewed the Project's designed output during their system impact study process. Eversource determined that the distribution circuit located along Town Farm Road and Abbe Road is suitable for the additional output from the Project. This incremental clean energy generation will improve grid resiliency in Connecticut by providing distributed energy where it is needed.

The operational life of the Project is based on the designed life expectancy of the equipment. The equipment for the Project consists of modules, racking and inverters. Photovoltaic modules and racking equipment have a designed life and warranty extending for twenty (20) years or greater. The inverters have a designed life and warranty of approximately ten (10) years or greater. Therefore, the anticipated operational life of the Project is twenty (20) plus years. At the end of the operational life of the Project, Lodestar will remove all equipment (*e.g.* racking system, panels, inverters, electrical collection system, etc.) from the Project Site,

recycle all recyclable materials and dispose of all non-recyclable materials in accordance with applicable law. See **Exhibit 4.**

In the event of a fault or power outage within the solar facility and/or the Eversource distribution circuit, the Project is required to be isolated from the distribution circuit within two (2) seconds of fault detection. The Project performs this isolation via a SEL 651R Pad Mounted Recloser which continually monitors for deviations in frequency, current and voltage outside of Eversource parameters. If a fault is detected, the recloser automatically opens the circuit and restricts the Project from production. The equipment specifications for the proposed equipment are attached hereto as **Exhibit 2**.

V. NO SUBSTANTIAL ENVIRONMENTAL IMPACTS

Conn. Gen. Stat. § 16-50k (a) provides that a Certificate is not required if an electric generating facility meets the air and water quality standards of the Department of Energy and Environmental Protection ("DEEP") and does not have a substantial adverse environmental effect. Lodestar engaged various environmental professionals to conduct a comprehensive environmental analysis. See **Exhibit 7** (Environmental Assessment), which includes information regarding the location of the Site, wetlands and vernal pools along with associated impacts, State Historic Preservation Office ("SHPO"), Natural Diversity Database (NDDB"), Federal Aviation Administration ("FAA") determinations, and noise analysis. Lodestar consulted with CT DEEP and other relevant agencies to evaluate potential environmental impacts. For these reasons and those addressed further below, this Project avoids, reduces, and mitigates potential environmental impacts.

A. AIR QUALITY

The Project will not generate any emissions but rather, as demonstrated in **Exhibit 9**, the Project will contribute to carbon reduction. The Project will have no air emissions during operation and only very minor air emissions of regulated air pollutants and greenhouse gasses during construction from the conventional construction equipment used to install the Project. Lodestar will control any temporary emissions at the Project Site by enacting appropriate mitigation measures *(e.g.*, water for dust control; avoid mass early morning vehicle startups, etc.).

Accordingly, any potential air effects produced by the Project's temporary construction activities will be *de minimis*. During operation, the Project will produce no regulated air pollutants or greenhouse gases (*e.g.*, PM, VOCs, GHG or Ozone). No air permit will be required for either construction or operation of the Project.

B. WILDLIFE RESOURCES

As detailed in the Environmental Assessment in **Exhibit 7**, the Project is not expected to have any negative impact on wildlife resources in the vicinity. The Petitioner's review of the most recent CT DEEP Natural Diversity Database mapping resulted in no threatened, endangered or species of special concern habitat identified within the Property.

C. WETLANDS AND WATERCOURSES

The Site will occupy the majority of the Property and will minimize impacts to the delineated wetland located on the Property.

One isolated wetland was delineated in the northwest corner of the Property (**Exhibit 7, Appendix B**). It is an ephemeral wetland that is seasonally flooded and has been confirmed as not being classified as a vernal pool, based on our Vernal Pool Report (**Exhibit 7, Appendix C**). The basin is largely absent of vegetation; wetland vegetation is limited to wetland shrubs around the

perimeter of the wetland boundary. The basin has a thick layer of topsoil that has migrated downslope from the farm fields above.

All work is proposed to occur outside of a 50-foot buffer of the wetland with very minor work occurring inside of the 100-foot upland review area, which is restricted to placement of a few fence posts no more than 15 feet inside of the upland review area. Due to the proximity of work activities to wetland resources, the Petitioner will implement a Resource Protection Program, which prescribes routine monitoring of sensitive areas, contractor awareness training, and environmental sensitivity awareness signage, which is included in **Exhibit 1**.

In addition, as further discussed in **Exhibit 7,** the vernal pool survey was conducted on April 25 and May 5, 2023. During the survey, no audial observations of vernal pool species were noted, and no visual observations of adults, larvae, or egg masses were seen. The wetland is ephemeral and shallow and the location is far removed from other vernal pool complexes. The entire Facility would be located in upland habitat consisting of existing maintained open fields. Developed and open field terrestrial habitats are considered suboptimal for vernal pool indicator species. Construction activities would not be expected to result in an adverse impact to the Property's wetland resources based on the proposed protection measures outlined herein and as shown on **Exhibit 1**.

D. STORMWATER MANAGEMENT

Petitioner completed a drainage analysis to review pre-and post-development runoff at the Site. As can be seen from the site plans and environmental assessment, construction and operation of the Project at the Site will fully comply with requirements of the Department and Energy and Environmental Protection ("DEEP") stormwater requirements, including Appendix I. The Project will have no adverse environmental effect on surface water quality.

On September 14, 2023, Petitioner participated in a pre-application meeting with the Department of Energy and Environmental Protection ("DEEP"). During this meeting, DEEP staff requested that the petition register the stormwater swale with DEEP once constructed and recommended to seed the fields right away once the harvest is complete to ensure a stronger vegetation before installation of the solar panels begins. The Petitioner will comply with both requests. DEEP confirmed that the Project was designed in accordance with the Appendix I requirements. Petitioner has not received any further comments from DEEP staff since September, 2023. Simultaneous with the filing of this Petition, Lodestar is filing its general permit application with DEEP's stormwater division.

E. FLOODPLAINS

The Project avoids impacts to the 100- or 500-year flood zone. Based upon the United States Federal Emergency Management Agency ("FEMA") Flood Insurance Rate Maps ("FIRMs") covering the Property, the Site is located in an area designated as Zone X, which is defined as an area of minimal flooding, typically above the 500-year flood level. Therefore, no special design considerations or precautions relative to flooding are required for the Project, and no impacts are anticipated to floodplain or downstream areas.

F. DRINKING WATER RESOURCES

The Project is not anticipated to result in any adverse impact to either ground or surface water resources. The Site is not located in an Aquifer Protection Area. There is a public water system serving the area surrounding the Site. Typical construction techniques for installation of the Facility do not require blasting or other similar measures. Construction and operation of the Facility should have no impact on groundwater resources.

Provided that erosion and sediment ("E&S") controls are installed and maintained in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control and stormwater is managed in accordance with the 2004 Connecticut Stormwater Quality Manual, no adverse effect on surface water quality is anticipated from development and operation of the Project.

G. HISTORIC RESOURCES

Heritage Consultants performed a Phase 1A investigation and recommended a Phase 1B be completed prior to construction in those portions of the Site identified as possessing moderate to high potential to contain intact archaeological deposits. The Phase 1B investigation has been completed and concluded that no significant archaeological deposits will be adversely impacted by project development. The Phase 1B has been submitted to the Connecticut State Historic Preservation Office ("SHPO").

H. SCENIC VALUES

The Project is not expected to have any effect on scenic or recreational resources in the area of the Site.

I. PUBLIC HEALTH AND SAFETY

Lodestar is immensely concerned with safety. Overall, the Project will meet or exceed all health and safety requirements applicable for electric power generation. The Project would be designed to applicable industry, state and local codes and standards and will not pose a safety concern or create undue hazard to the public. The Project includes a proposed seven (7) foot high safety fence and locked gate (which is mandated by National Electric Code), which will limit access to authorized or emergency personnel only. Each employee working on the Project Site will:

- Receive required general and Site-specific health and safety training;
- Comply with all health and safety controls as directed by local, state, and federal requirements;
- Understand and employ the Site health and safety plan;
- Know the location of local emergency care facilities, travel times, ingress and egress routes; and
- Immediately report all unsafe conditions to the construction manager.

During construction, heavy equipment will be required to access the Project Site and higher levels of noise are anticipated; however, Lodestar will conduct all activities during normal working hours.

J. NOISE

Noise generated by this Project will derive from the operation of (8) Solectria XGI 1500-166/166kW inverters and (1) Maddox 1500kVA transformer on the southern equipment pad and (4) Solectria XGI 1500-150/166kW inverters and (1) Maddox 750kVA on the northern equipment pad. Noise will also be emitted from the tracker panels' drivetrain motor (the motor that allows the panels to track the sun). A single Solectria inverter has an acoustic noise output of 73dBA at 1 meter (3.28 ft) from the unit, a single 1500kVA Maddox transformer has an output of 60 dBA at 1 meter (3.28ft), a single 750kVA Maddox transformer has an output of 58 dBA at 1 meter (3.28ft), and a single ATI tracker drivetrain motor has an output of 66 dBA at 1 meter (3.28ft). As stated in Regulations of Connecticut State Agencies Sec. 22a-69-3.5, noise received within residential zones shall not exceed 51dBA at night and 61dBA during the daytime in order to minimize disturbance to abutting and adjacent property owners.

As calculated in **Exhibit 8**, the noise levels emitted from the inverters and transformers on the northern equipment pad will be 45.2 dBA at the closest abutting property line, which is 160 ft away from the origin of noise emanation. The noise levels emitted from the inverters and transformers on the southern equipment pad will be 61 dBA at the closest abutting property line, which is 35 ft away from the origin of noise emanation. It is also worth noting the closest abutting property line is an open farm field. The closest residence is 315 ft away from the southern equipment pad. The noise emitted from the tracker drivetrain motors will be 30 dBA at the closest abutting property line, which is 55 ft away from the origin of noise emanation. At night time, the equipment will not be in use and will make no noise, or 0 dBA. Noise will be further reduced at farther property lines and buildings. Therefore, the proposed Project and its components comply with the applicable regulations.

K. FAA

Pursuant to 14 CFR § 77.9 regarding the FAA Notice of Proposed Construction or Alteration, the FAA must be notified of "any construction or alteration that exceeds an imaginary surface extending outward and upward at a slope of 100 to 1 for a horizontal distance of 20,000 feet from the nearest point of the nearest runway of the airport." 14 CFR § 77.9(b)(l) The Project Site information has been submitted to the FAA for review and approval and a copy of the FAA determination of no hazard is attached hereto as **Exhibit 7, Appendix F.**

L. CARBON DEBT ANALYSIS

Lodestar has conducted an independent analysis of the Carbon Debt and Carbon Offsets of this Project. The proposed solar array Project area of disturbance, also referred to as "the Site," (including panels, electrical equipment, access roads, and related ground clearing) is designed to cover approximately 12.10 acres of the 15.82-acre Property. All recyclable materials

will be recycled and all non-recyclable materials will be disposed of in accordance with applicable law. Approximately a 11.91-acre footprint of the proposed solar Project consists of unforested terrain. In total, the project calls for 0.19 acres of tree clearing for placement of the access road and shade mitigation in select areas within the vicinity of the arrays. There are demonstrable net benefits to the construction and operation of the solar Project which significantly offset the proposed 0.19 acres of clearing. The removed 0.19 forested acres results in a carbon debt of 0.2 MT CO2 in the first year. The net result of the project is a carbon offset of 2,883.8 MT CO2 in the first year. It will take less than two days to recover the loss of carbon sequestration by the 0.19 acres of cleared trees with benefits accruing over 20 years.

The proposed solar Project is calculated to produce 4,070 MWh of energy during the first operational year. As shown in **Exhibit 9**, the energy generation of the proposed Project results in an annual carbon offset of 2,884 MT CO2. Greenhouse gas equivalencies for this estimated offset include:

- 642 gasoline-powered passenger vehicles driven for one year;
- 3,230,901 pounds of coal burned; and
- 364 homes' energy use for one year.

VI. PROJECT CONSTRUCTION AND MAINTENANCE

The construction of the Project will have an anticipated duration of approximately six to nine months, depending on the timing of applicable approvals, requiring the services of local electrical, civil and structural contractors. The initial phase of construction will include the creation of the two access roads, clearing and grubbing of the stormwater controls and, as required by DEEP, construction activities will not commence until full site stabilization has occurred. Based on the existing schedule, construction activities would then commence in the

Q3 2024 or upon approval. Next, steel foundations will be driven into the ground for the arrays. Steel racking components and drive motors will be mounted on these foundations followed by the installation of photovoltaic modules. The electrical contractor will then install conductors from the photovoltaic modules to the inverters and then to the transformers on the two equipment pads. A single SEL 651R Pad Mounted Recloser will be installed on each equipment pad. A pole mounted GOAB will be mounted along the access road on the customer-owned side of the Point of Common Coupling. In parallel, Eversource will install three (3) utility poles at both site accesses and provide utility interconnection to the site. The electrical contractor will then install a medium voltage circuit from the transformers to the SEL 651R Recloser to the GOAB to the Eversource point of common coupling. Construction schedule will be based on a six (6) day work week Monday through Saturday between the hours of 7:00 AM and 5:00 PM but will be modified if required to comply with Town of Enfield requirements. As noted above, the Petitioner will utilize erosion and sedimentation control consistent with the 2002 Connecticut Guidelines for Erosion and Sedimentation Control throughout construction of the Project.

Once construction is complete and the Project is operational, the Project Site will be monitored remotely twenty-four (24) hours a day, seven (7) days a week through a data acquisition system (DAS). The DAS is capable of detecting weather, production from all equipment at the Project Site, and safety concerns related to possible issues on site, grid outages, or faults. See **Exhibit 3.** An operations and maintenance team will perform detailed scheduled annual inspections of all equipment at the Project Site to make sure equipment is operating safely and reliably. In addition, the Petitioner's operations and maintenance team is on-call at all times in the event of unscheduled equipment maintenance or safety related concerns. Site vegetation is typically mowed three (3) times annually or as needed.

VII. CONCLUSION

This Project is precisely the type of project that Connecticut legislature, regulatory agencies, environmental groups, utilities, and ratepayers have been promoting to support our State's renewable energy goals and provide benefits to municipal customers like the City of Hartford. The Project, a grid-side distributed resources Project with a capacity of less than 65 MW, is among the types of Projects that the Council can approve by declaratory ruling. Accordingly, and for the reasons stated herein, because the proposed Project will meet state air and water quality standards and will not have a substantial adverse effect on the environment, Petitioner respectfully requests that the Council approve the location and construction of the proposed Project by declaratory ruling.

Respectfully submitted,

Petitioner
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