



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 24, 2024

Lee D. Hoffman, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702
lhoffman@pullcom.com

RE: **PETITION NO. 1615** - C-Tec Solar, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 3.98-megawatt AC solar photovoltaic electric generating facility located at the former Hartford Landfill at 180 Leibert Road, Hartford, Connecticut, and associated electrical interconnection.
Council Interrogatories to Petitioner.

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than June 14, 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 June 14, 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,

Melanie Bachman
Executive Director

MAB/in/dll

c: Service List dated February 21, 2024

**Petition No. 1615
C-Tec Solar, LLC
180 Leibert Road, Hartford, Connecticut**

**Draft Interrogatories
May 24, 2024**

Notice

1. Referencing Petition p. 9 and Exhibit B, has C-Tec Solar, LLC (C-Tec) received any comments since the petition was submitted to the Council? If yes, summarize the comments and state how these comments were addressed.
2. Would notice to the Federal Aviation Administration (FAA) be necessary for the temporary use of a crane during construction?

Project Development

3. Has C-Tec applied to the Department of Energy and Environmental Protection (DEEP) for a Stormwater Permit? If so, what is the status of such permit?
4. Referencing Petition pp. 6, and 7, if the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
5. What is the estimated cost of the project?
6. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?
7. Referencing Petition p. 9, when was the City's RFP process initiated, what was the goal of the RFP and when was the project selected in the City's RFP?
8. What is the revenue mechanism for the proposed project?
9. Which entities would purchase the energy, capacity and renewable energy certificates (RECs) from the project?
10. To whom would the total capacity of the facility be supplied and in what percentage?
11. If the facility operates beyond the terms of any RFP Agreement, will C-Tec decommission the facility or seek other revenue mechanisms for the power produced by the facility?
12. If C-Tec transfers the facility to another entity, would C-Tec 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

13. Does C-Tec have a lease agreement with the City for the site? If so, what is the length of the lease agreement?
14. If there is a lease agreement with the City, 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. Provide a decommissioning plan to summarize the plans to remove equipment and restore the site after the operational life has been reached and/or the project is removed from service.
16. What entity manages the landfill?
17. What is the distance from the perimeter fence of the solar facility to the nearest residence and what is the address of the residence?
18. Referencing Petition p. 8 and Exhibit A p. 6 and Appendix A (project plans) please provide construction plans showing the existing landfill security fence and gate.

Existing Solar Array

19. When was the existing solar array installed at the site?
20. What is the generating capacity of the existing solar array at the site in alternating current?
21. Would the existing solar array interact and/or interfere with operation of the proposed solar facility? Explain.

Proposed Facility and Associated Equipment

22. Provide site plans showing the location of the inverters, switchgear and transformers. Would the inverters be installed on concrete pads or posts? What are the approximate dimensions of the transformer and switchgear.
23. Provide the dimensions of the ballasts supporting the solar panels.
24. What is the length of the existing access road?

Energy Output

25. Is the project being designed to accommodate a potential future battery storage system? If so, please indicate the anticipated size of the system, where it may be located on the site, and the impact it may have on any contract(s).
26. What is the anticipated capacity factor of the project? Identify what electrical loss assumptions have been factored into the output of the facility, if any.

27. Would C-Tec participate in an ISO-NE Forward Capacity Auction or other energy markets? Explain.

Electrical Interconnection

28. Provide the line voltage of the proposed electrical interconnection.
29. Provide the distance of the interconnection point from the facility equipment pad.
30. Provide the total length of cable tray to be installed.
31. Referencing Petition p. 6, the project would require the installation of four new utility poles. Of the four poles, how many would be C-Tec-owned and how many would be Eversource-owned?
32. What equipment would be located on the Eversource and C-Tec poles?
33. Provide the height above grade of the proposed utility poles and their distance apart.
34. Would any of the power produced be used on-site, or would it all be fed into the local distribution system? If any of the power would be used on-site estimate the total on-site load in kilowatts.
35. Has an interconnection application been submitted? If so, what is the status?
36. Does the interconnection require a review from ISO-NE?
37. Would any off-site upgrades to the existing electric distribution system be required (e.g. distribution line upgrades and/or upgrades from single to three phase)? If yes, describe.
38. Have there been any discussions with Eversource to use pad-mounted equipment rather than pole-mounted equipment? Provide cost estimates for both an overhead and underground interconnection.

Public Safety

39. Would the project comply with the current Connecticut State Building Code —~~2022~~, National Electrical Code, and Connecticut State Fire Prevention Code?
40. Referencing Petition Exhibit A, Appendix A, Sheet SP-3, aside from a prohibition on ground penetration, what other safety and precautionary measures are required to protect the existing gas vent pipes?
41. What are industry Best Management Practices for Electric and Magnetic Fields at solar facilities? Would the site design conform to these practices?
42. What equipment would be the major source of noise at the proposed site. Would the proposed project meet the applicable state noise standards at the property boundaries?
43. Where is the nearest federally-obligated airport? Is a glare analysis required to comply with Federal Aviation Administration (FAA) policy?

44. Referencing Petition p. 27 and Exhibit A/Appendix G, has C-Tec received an updated Determination of No Hazard to Air Navigation from the FAA?
45. Referencing Petition p. 8, 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?
46. Are there manual facility shut-off switches that can be operated by emergency personnel? If yes, in what location(s)?
47. 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?
48. 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?
49. Provide an Emergency Response Plan for the proposed facility.
50. What type of insulating oil is used within the transformer(s)? Is it biodegradable? Do the transformer(s) have a containment system in the event of an insulating oil leak? Would the transformer(s) have a low oil alarm?
51. What is the noise profile of the selected transformer?

Environmental Effects and Mitigation Measures

52. Considering the facility's proximity to the Connecticut River, would the solar panels attract birds (ex. appear as water)? How would the petitioner manage bird collisions and/or damage to the panels (ex. from dropping prey shells)?
53. Referencing Petition Exhibit A, Appendix G, the Photo Log Map on the second page is partially blank. Submit a copy of the full map.
54. Submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);

9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

Facility Construction

55. Referencing Petition Exhibit A, Appendix A (project plans) Sheet VR-01, what is the purpose of the “Stone Mowing Strip?”
56. What effect would runoff from the drip edge of each row of solar panels have on the landfill cap or site drainage patterns? Would channelization below the drip edge be expected?
57. Would ballasts be cast on-site? If yes, where would this activity occur?
58. What type of construction vehicles would be expected to enter the site during construction and where would they park?
59. Identify the location of the construction staging area within the proposed site.

Facility Maintenance/Decommissioning

60. Provide a post-construction Operations and Maintenance Plan (O&M Plan) for the project.
61. Has the manufacturer of the proposed solar panels conducted Toxicity Characteristic Leaching Procedure (TCLP) testing to determine if the panels would be characterized as hazardous waste at the time of disposal under current regulatory criteria? If so, submit information that indicates the proposed solar modules would not be characterized as hazardous waste. If not, would C-Tec agree to install solar panels that are not classified as hazardous waste through TCLP testing?
62. Would the installed solar panels require regular cleaning or other, similar, maintenance? If so, describe cleaning procedures including substances used.
63. Provide a Project Decommissioning Plan.