



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

June 24, 2024

Kenneth C. Baldwin, Esq.
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RE: **PETITION NO. 1617** – Woodstock Solar One, LLC and VCP, LLC d/b/a Verogy, 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 3.0-megawatt AC solar photovoltaic electric generating facility and associated equipment located at 11 Castle Rock Road, Woodstock, Connecticut, and associated electrical interconnection. **Council Interrogatories to Petitioner.**

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 15, 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 July 15, 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/MP

Enclosure: Revised Schedule dated June 24, 2024

c: Service List dated March 5, 2024

**Petition No. 1617
Woodstock Solar One, LLC
11 Castle Rock Road, Woodstock**

**Interrogatories
June 24, 2024**

Notice

1. Has Woodstock Solar One, LLC and VCP, LLC d/b/a Verogy (WSO) received any comments since the petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.

Project Development

2. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
3. What is the estimated cost of the project?
4. 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?
5. If WSO transfers the facility to another entity, would WSO 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

6. Submit a map clearly depicting the boundaries of the solar facility site and the boundaries of the host parcel. 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.
7. Referencing Petition pp. 14-15, WSO notes that, "The Project...will occupy approximately 14 of the 38.3 acres with approximately 19 acres of total limits of disturbance." Is 14 acres the approximate combined area of the two fenced solar array areas? Explain.
8. What is the length of the lease agreement with the property owner? Describe options for lease extension(s), if any.
9. Does the lease agreement(s) with the property owner contain provisions for agricultural co-uses at the site? If yes, describe the co-uses.
10. 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.

11. 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 for complaints?
12. Referencing Petition p. 6, is the host parcel currently farmed by the property owner or by a third party? If by a third party, is this use subject to a lease agreement and if so, when does the lease expire?
13. Is the site, or any portion of the host parcel(s), part of the Public Act 490 Program? If so, how does the municipal land use code classify the parcel(s)? How would the project affect the use classification?
14. Has the State of Connecticut Department of Agriculture (DOAg) purchased any development rights for the facility site or any portion of the facility site as part of the State Program for the Preservation of Agricultural Land?
15. Is the site and/or host parcel within a Town of Woodstock-designated conservation easement?
16. Referencing Petition Appendix A, Existing Conditions Map, the host parcel is noted as “subject to water line rights and possible reservoir rights” in favor of two other parcels and the parcel to the southeast and southwest of the solar arrays is noted as “the Spring Lot.” Explain how these notations relate to the development of the parcel for the proposed solar facility.
17. If the project is sold and/or transferred to another entity, would the sale and/or transfer include management and maintenance of these agricultural co-use areas?
18. Referencing Petition p. 17, provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar field perimeter fence and the proposed access drive.

Proposed Facility and Associated Equipment

19. Referencing Petition, Appendix A, Sheet C-2.0, provide the widths and lengths of the proposed gravel Y-shaped southwestern and southeastern access drives.
20. Referencing Petition, pp. 7 and 17 and Appendix A, Sheet C-2.0, would each inverter bank of 12 inverters each be located on the equipment concrete pads, attached to the post-supported racking, or free standing on posts next to the equipment concrete pads? Explain.
21. Referencing Petition, Appendix A, Sheet C-5.1, Cross Section of Fixed-Tilt Panel Array, what is the approximate angle with the horizontal that the solar panels would be oriented at?
22. Referencing Petition, Appendix A, Sheet C-5.1, Cross Section of Fixed-Tilt Panel Array, the minimum clearance is 2 feet between the bottom edge of the panels and grade. What is the maximum clearance between the bottom edge of the panels and grade? What is the maximum height from grade to the top edge of the panels?
23. Would the wiring from the panels to the inverters be installed on the racking system? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation maintenance, or animals?
24. Provide the approximate dimensions of the proposed equipment pads.
25. List the equipment that would be installed on the proposed equipment pads.

Energy Output

26. Referencing Petition p. 8, has WSO executed a Tariff Terms Agreement (TTA) with Eversource? Would WSO also sell the renewable energy certificates (RECs) to Eversource? Would the TTA include the transfer of capacity to Eversource?
27. Approximately how many MW AC each are the eastern solar array and the western solar array?
28. Referencing November 17, 2023 WSO letter to DOAg, Section 2b, the percentages of energy production to be delivered to various customer groups under the Shared Clean Energy Facility (SCEF) are provided. Would the percentages remain approximately the same on a capacity (rather than energy) basis?
29. 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 the SCEF Agreement.
30. If one section of the solar array experiences electrical problems causing the section to shut down, could other sections of the system still operate and transmit power to the grid? By what mechanism are sections electrically isolated from each other?
31. Would WSO participate in an ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?
32. Referencing Petition p. 8, what electrical loss assumptions have been factored into the output of the facility? What is the output (MW AC) at the point of interconnection?
33. If the facility operates beyond the terms of the SCEF Agreement, will WSO decommission the facility or seek other revenue mechanisms for the power produced by the facility?
34. Would WSO construct the facility if the solar array area footprint was reduced and/or if the facility design features (ex. row spacing, panel height, etc.) were modified? Explain.

Electrical Interconnection

35. Provide the line voltage of the proposed electrical interconnection.
36. Does the interconnection require a review from ISO-NE?
37. Referencing Petition pp. 8-9, what is the status of the transmission impact study and interconnection agreement with Eversource?
38. Will the interconnection provide energy to a substation? If yes, which one?
39. Provide a preliminary or final (as available) electrical interconnection design drawing depicting the point of interconnection, location of demarcation between WSO and Eversource, pole quantity and locations on the subject property, equipment on WSO and Eversource poles, and approximate pole heights.
40. Has WSO discussed with Eversource the possibility of reducing/minimizing the number of poles required for the interconnection? Explain.

41. Has 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 Health and Safety

42. Would the project comply with the current Connecticut State Building Code, National Electrical Code, National Electrical Safety Code, Connecticut State Fire Prevention Code, and National Fire Protection Agency codes and standards, as applicable?
43. What are industry Best Management Practices for Electric and Magnetic Fields at solar facilities? Would the site design conform to these practices?
44. 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?
45. How would site access be ensured for emergency responders?
46. Could the entire facility be shut down and de-energized in the event of a fire? If so, how?
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. Would firewater or other runoff from a solar panel/electrical fire be considered hazardous and require cleanup by a hazardous materials response contractor?
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 measures would be employed to ensure there would be no soil erosion and flooding resulting from construction activities and post-construction development of the site?
52. Would notice to the Federal Aviation Administration (FAA) be necessary for the temporary use of a crane during construction?
53. What is the distance of the proposed facility to Woodstock Airport?
54. Referencing Petition p. 19 and Appendix K, where is the nearest federally-obligated airport?
55. What noise-generating equipment would be installed at the site? Would operation of the proposed facility meet the applicable state noise standards at the nearest property boundary?
56. Referencing Petition p. 17, it states noise sound levels were based on a previously completed sound analysis that determined a combined inverter bank has a calculated sound power level of under 85 dBA at one meter. What inverter manufacture/model was used in the previously completed combined inverter bank analysis?

57. Referencing the Sheep Grazing Plan Attached to the January 19, 2024 DOAg correspondence, if temporary electric fence is used at the site to create defined pasture areas within the solar field, what types of safety measures are in place to prevent electric fence shock hazards?
58. Regarding sheep grazing at the site, would flock protection animals such as dogs, llamas or donkeys be used?
59. How many days per week would the sheep manager visit the site to check on the sheep?
60. How would sheep be managed if electrical contractors/personnel were dispatched to the site for nonscheduled maintenance or emergency repair work?
61. Referencing page 8 of the Sheep Grazing Plan attached to the January 19, 2024 DOAg correspondence, provide a sample copy of the sheep manager contact sign.

Environmental Effects and Mitigation Measures

62. Will livestock manure affect the water quality of adjacent wetlands? How can such effects be mitigated?
63. How would water be provided at the site for the sheep?
64. What is the length of the posts and to what depth would the posts be driven into the ground? How would the posts be driven into the ground? Are any impacts to groundwater quality anticipated? If so, how would WSO manage and/or mitigate these impacts?
65. Are there any water supply wells in the vicinity of the site? If yes, would vibrations from the installation of racking posts affect well function and/or water quality, such as well water sedimentation?
66. Referencing Petition, Figure 6, the proposed facility would be located within a public drinking water supply watershed. How would WSO protect water quality within this watershed?
67. Referencing Petition, p. 7 and Appendix F – Phase 1A Survey Report, p. 23, would existing stone walls remain in place post-construction to the extent feasible?
68. Referencing Petition, p. 19 and letter from the State Historic Preservation Office dated April 9, 2024, provide a copy of the Phase 1B Survey Report dated March 2024.
69. Describe the visibility of the proposed facility from the two abutting residences located directly east of the host parcel and west of Route 169.
70. Referencing Petition, p. 18, Route 97, a state-designed scenic road, is not visible from the project site. Would the proposed facility be visible from Route 97? Explain.
71. Referencing Petition, p. 18, describe the visibility of the proposed facility from Norwich Worcester Turnpike (Route 169), a nationally-designated scenic road.
72. Referencing Petition p. 18, are there any locally-designated scenic roads proximate to the proposed facility? If yes, provide the distance and describe the visibility of the facility from such scenic road.

73. Referencing Petition, p. 20, what is the status of the potential vernal pool survey? Provide a copy of the survey results if available and any recommended vernal pool protective measures. Would the project comply with the 2015 U.S. Army Corps of Engineers Vernal Pool Best Management Practices, if applicable?
74. Referencing Petition, Appendix A, Sheet C-5.1, the proposed agricultural style fence would have a 4 to 6 inch wildlife gap at the bottom of the fence. Would such gap be compatible with hosting sheep at the site? Explain.
75. Referencing Petition, Appendix A, Sheet C-4.0, 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?
76. 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

77. Has the WSO met with the Department of Energy and Environmental Protection (DEEP) Stormwater Division? If yes, when? Please describe any recommendations, comments or concerns about the project provided by the Stormwater Division and how such feedback was addressed in the project design.
78. DEEP's General Permit Appendix I states that the 50-foot wetland buffers shall be comprised of existing dense herbaceous vegetative ground cover. Provide information regarding the presence of this ground cover type within the proposed wetland buffer area.
79. With regard to earthwork required to develop the site, provide the following:
- a) Will the site be graded? If so, in what areas?

- b) What is the desired slope within the solar array areas?
 - c) Could the solar field areas be installed with minimal alteration to existing slopes?
 - d) If minimal alteration of slopes is proposed, can existing vegetation be maintained to provide ground cover during construction?
 - e) Estimate the amounts of cut and fill in cubic yards for the access road(s).
 - f) Estimate the amounts of cut and fill in cubic yards for solar field grading.
 - g) If there is excess cut, will this material be removed from the site property or deposited on the site property?
80. Referencing Petition p. 7, how would the posts or ground screws (that support the racking system) be driven/spun into the ground?
81. Has a comprehensive geotechnical study been completed for the site to determine if site conditions support the overall Project design? If so, summarize the results. Was any tree clearing necessary to perform the geotechnical study? If so, where?
82. Will blasting be required to construct the site or stormwater features? If not, how will racking posts be installed if bedrock or ledge is encountered?

Facility Maintenance/Decommissioning

83. Would the inverters last the life of the project? If not, at what time intervals would the inverters need to be replaced?
84. Would replacement modules be stored on-site in the event solar panels are damaged or are not functioning properly? If yes, in what location?
85. Referencing Petition Appendix D, explain how the value of the components of the array at the end of the project's useful life in a salvage or resale value would be greater than the expected cost of decommissioning the facility.



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REVISED SCHEDULE

PETITION NO. 1617 – Woodstock Solar One, LLC and VCP, LLC d/b/a Verogy, 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 3.0-megawatt AC solar photovoltaic electric generating facility and associated equipment located at 11 Castle Rock Road, Woodstock, Connecticut, and associated electrical interconnection.

Petition received	03/05/2024
Public Comment Period Deadline	04/04/2024
Council 60-day Action – Set Date for Decision to 09/01/2024	04/25/2024
Deadline for Action	05/04/2024
Council Interrogatories	
• Set One Issued	06/24/2024
• Set One Responses due	07/15/2024
Deadline for Decision	09/01/2024