



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

May 24, 2024

Lee Hoffman, Esq.
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90 State House Square
Hartford, CT 06103-3702
lhoffman@pullman.com

RE: **PETITION NO. 1622** – 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 1.66-megawatt AC solar photovoltaic electric generating facility and associated equipment to be located at 186 Foster Street, South Windsor, 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/MP

c: Service List dated April 25, 2024

Petition No. 1622
C-Tec Solar, LLC
186 Foster Street, South Windsor

Pre-Hearing Interrogatories
May 24, 2024

Notice

1. Referencing Petition Narrative/Text, please submit a hard copy with a corrected table of contents and page numbers and without blank pages.
2. Referencing Petition, Section 2.2.4 – Community Relations, when did C-Tec Solar, LLC (C-TEC) first initiate discussions with the Town of South Windsor (Town) regarding the proposed Project? What was discussed with the Town prior to submitting the petition to the Council?
3. Has C-TEC received any comments since the petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.
4. Would notice to the Federal Aviation Administration be necessary for the temporary use of a crane during construction?

Project Development

5. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
6. 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?
7. What is the estimated cost of the project?
8. Identify the location of any alternate sites that were considered for solar development and the reasons they were rejected. Why was the host parcel selected versus any of the alternative sites?
9. 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?
10. Was the project selected through an RFP process? If so, which RFP? For example, would the facility participate in the Shared Clean Energy Facility (SCEF) Program or the Non-residential Renewable Energy Solutions (NRES) Program? Which year of such program was the project selected, if applicable?
11. Which entities would purchase the energy, capacity and renewable energy certificates (RECs) from the project?
12. If the project will participate in the SCEF Program, approximately what percentage of the capacity would be supplied to low- and moderate-income customers versus small business and other customers?

13. If the facility operates beyond the terms of the any RFP Agreement (e.g. SCEF or NRES agreement), will C-TEC decommission the facility or seek other revenue mechanisms for the power produced by the facility?
14. 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

15. What is the length of the lease agreement with the property owner?
16. 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.
17. 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?
18. Has the State of Connecticut Department of Agriculture 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?

Proposed Facility and Associated Equipment

19. Provide specifications sheets for a) proposed inverters and b) solar photovoltaic panels.
20. Referencing Petition, Section 2.2.1, would the inverters be located on the concrete pad, attached to the post-supported racking, or free standing on posts next to the concrete pad? Explain.
21. Referencing Petition, Section 2.2.1, a 1,000 kVA transformer is proposed. Referencing Environmental Assessment p. 23, a 2,000 kVA transformer is proposed. Clarify.
22. Referencing Petition, Section 2.21, 13 inverters are proposed. Approximately how many kilowatts AC are each inverter?
23. Referencing Petition, Environmental Assessment, Appendix A, Sheet DN-1, Typical Post Mounted Racking System, what is the approximate angle with the horizontal that the solar panels would be oriented at?
24. Referencing Petition, Environmental Assessment, Appendix A, Sheet DN-1, Typical Post Mounted Racking System, what is the maximum height from grade to the top edge of the panels?
25. 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?
26. Provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar field perimeter fence, transformer pads, and the proposed access drive.

Energy Output

27. 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).
28. 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?
29. Would C-TEC participate in an ISO-NE Forward Capacity Auction (FCA) or other energy markets? Explain.
30. 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.
31. Would C-TEC 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

32. Provide the line voltage of the proposed electrical interconnection.
33. What is the status of the Interconnection Agreement with Eversource?
34. Does the interconnection require a review from ISO-NE?
35. 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.
36. Referencing Petition, Section 2.2.1, the Project would require the installation of five new utility poles. Of the five poles, how many would be C-TEC-owned, and how many would be Eversource-owned? What is the height above grade of the proposed utility poles and the distance between them?
37. What equipment would be located on the Eversource and C-TEC poles?
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, National Electrical Code, National Electrical Safety Code, Connecticut State Fire Prevention Code, and National Fire Protection Agency codes and standards, as applicable?
40. What are industry Best Management Practices for Electric and Magnetic Fields at solar facilities? Would the site design conform to these practices?
41. Where is the nearest federally-obligated airport? Is a glare analysis required to comply with FAA policy?

42. 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?
43. Referencing Petition, Environmental Assessment, p. 23, C-TEC notes that, "There would be some small, non-intrusive lighting fixtures within the equipment to aid in maintenance." Would the light fixtures be located at the equipment pad area? Would the lights be on at night or only when maintenance is being performed? Explain.
44. Provide an Emergency Response Plan for the proposed facility.
45. What are the points of access for emergency response?
46. 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?
47. 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?
48. Would firewater or other runoff from a solar panel/electrical fire be considered hazardous and require cleanup by a hazardous materials response contractor?
49. 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?
50. If private water wells are located on properties abutting the site, would vibrations from the installation of racking posts affect well function and/or water quality, such as well water sedimentation?
51. What is the distance from the equipment pad to both the property line and residence at 178 Foster Street? What would be the noise level from operation of the facility at the 178 Foster Street property line?
52. What is the distance from the equipment pad to both the property line and residence at 54 Orchard Hill Drive? What would be the noise level from operation of the facility at the 54 Orchard Hill Drive property line?

Environmental Effects and Mitigation Measures

53. 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 C-TEC manage and/or mitigate these impacts?
54. Referencing Petition, Section 3.7, what is the status of the Phase 1B Survey?
55. Referencing Petition, Environmental Assessment, p. 21, describe the visibility of the proposed facility from Green Ridge Open Space and provide the distance.
56. Do the viewshed analysis and photo simulations account for the proposed clearing? Explain.

57. Can landscape screening be installed to the north to screen views from the residences along Orchard Hill Drive and to the west to screen views from the residences along Foster Street?
58. Can the array area be moved and reconfigured so it fills more of the open area in the southeastern portion of the host parcel and is farther away from the residences along Foster Street and Orchard Hill Drive?
59. 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

60. Will blasting be required to construct the site? If not, how will racking posts be installed if bedrock or ledge is encountered?

Facility Maintenance/Decommissioning

61. Provide an Operations and Maintenance (O&M) Plan for the Project.
62. Would the installed solar panels require regular cleaning or other, similar, maintenance? If so, describe cleaning procedures including substances used.
63. 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?

64. Provide a Project Decommissioning Plan.