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June 12, 2024

**VIA FEDERAL EXPRESS AND  
ELECTRONIC MAIL**

[Melanie.bachman@ct.gov](mailto:Melanie.bachman@ct.gov)  
[Siting.council@ct.gov](mailto:Siting.council@ct.gov)

Ms. Melanie A. Bachman, Esq., Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**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.

Dear Attorney Bachman:

This office represents the Town of South Windsor (“Town”). On behalf of the Town, I enclose Interrogatories to C-TEC Solar, LLC in connection with the above-captioned matter. In accordance with § 16-50j-12 of the Regulations of Connecticut State Agencies, I have enclosed an original and fifteen (15) copies of these interrogatories.

If you have any questions concerning the objection, please do not hesitate to contact me.

Sincerely,

Richard D. Carella  
Town Attorney

cc: Audrey Delnicki, Mayor  
Michael Maniscalco, Town Manager  
Michele Lipe, Town Planner  
Service List

**Urdike, Kelly & Spellacy, P.C.**

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**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

C-TEC SOLAR, LLC PETITION FOR : PETITION NO. 1622  
DECLARATORY JUDGMENT THAT NO :  
CERTIFICATE OF ENVIRONMENTAL :  
COMPATIBILITY AND PUBLIC NEED :  
IS REQUIRED FOR A 1.66 MEGAWATT :  
AC SOLAR PHOTOVOLTAIC ELECTRIC :  
GENERATING FACILITY IN SOUTH :  
WINDSOR CONNECTICUT : June 12, 2024

**INTERROGATORIES TO C-TEC SOLAR, LLC  
BY THE TOWN OF SOUTH WINDSOR**

Pursuant to § 16-50j-22a(c) of the Regulations of Connecticut State Agencies, the Town of South Windsor (“Town”), through counsel, propounds the following interrogatories to Tec Solar, LLC (“C-Tec”) concerning the above-captioned matter pending before the Connecticut Siting Council (“Council”). Unless otherwise specified, capitalized terms assume the same meaning as provided in the Petition. The Town reserves its right to propound additional interrogatories in accordance with the Council’s Hearing Procedure Memorandum, dated May 16, 2024.

**Site Control**

1. Exhibit A to the Petition states that C-Tec intends to lease the Site. Does C-Tec have an executed lease for the Site? If so, please provide a copy.
2. If C-Tec does not have a lease with the owner of the Property, please state the nature of C-Tec’s Site control. Please submit evidence of Site control.
3. If the Petition is approved by the Council, will C-Tec and/or the Property owner commit to reverting the Site to open space and/or agricultural use?

**Abutters**

4. How many abutters has C-Tec spoken with directly about the Project?
5. How many abutters has C-Tec met with either at the abutter’s residence or on the Site about the Project?
6. Please provide a list of abutters with whom C-Tec met or conversed about the Project.

## **Environmental Assessment**

7. Exhibit A of the Petition refers to an existing tobacco barn. Has C-Tec evaluated the historical agricultural use of the Site and Property?
8. Has C-Tec performed any due diligence concerning the existence of contaminants on or below the Site or Property? If so, please explain the extent of that due diligence. Please provide copies of all reports or investigations arising from that due diligence.
9. Has C-Tec performed a Phase I Environmental Assessment (“Phase I”) of the Property and/or Site?
  - a. If so, please provide a copy of the Phase I.
  - b. If not, please explain why C-Tec did not perform a Phase I, including reference to the historical agricultural use of the Site and Property.
10. Is C-Tec willing to install baffling or other noise mitigation measures to limit the noise of the thirteen inverters and the transformer contemplated for the Project? Please explain.
11. Please confirm whether the solar panels would shed any chemical substance in the event of precipitation or otherwise. If so, please explain what protective measures C-Tec would take to prevent those substances from entering the drainage system or otherwise harming the surrounding environment.

## **Buffering; Planting; Historical**

12. Has C-Tec explored options to reduce the number of poles contemplated for interconnection to reduce the visual impact of the Project? Please explain.
13. Has C-Tec performed a leaf-off assessment of the visual impact of the Project on the adjacent residential neighborhood? If so, please explain. If not, please provide an assessment of leaf-off conditions including photo-simulations.
14. Has C-Tec explored the following (including a combination thereof) along the northern boundary of the Site to minimize the visual impact of the Project on the adjacent residential neighborhood, particularly during leaf-off periods? Please explain.
  - a. Installation of vegetative buffering and landscaping;
  - b. Installation of a vegetative berm; and/or
  - c. Installation of decorative fencing.
15. Has C-Tec explored the preservation of the existing tobacco barn to serve as an additional buffer to the proposed Project. Please explain.
16. Does the tobacco barn have historical significance? If so, will C-Tec commit to the long-term preservation of that structure? Please explain.

17. To the extent the landscaping on the Site becomes unhealthy or deficient, what would be the process for notifying C-Tec? What is the timeline for C-Tec to correct any deficiencies?

**Construction; Decommissioning**

18. If the Petition is approved by the Council, will C-Tec abide by the Town's Construction Ordinance for construction in residential zones?

19. If the Petition is approved by the Council, will the Project construction be reviewed by an independent third-party?

20. If the Petition is approved by the Council, will the Town be able to inspect the construction of the Project?

21. Are there any additional Project lay-down areas other than the area reflected on the Project Plans?

22. Will C-Tec post a bond or other financial assurance to cover all costs associated with decommissioning and removal of the solar infrastructure?

Respectfully submitted by,

THE TOWN OF SOUTH WINDSOR



By: \_\_\_\_\_

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**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing document was sent via electronic mail to the service list for Petition 1622, in accordance with § 16-50j-12 of the Regulations of Connecticut State Agencies, on June 12, 2024:

Lee Hoffman, Esq.  
Pullman & Comley  
90 State House Square  
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By: \_\_\_\_\_



Richard D. Carella, Esq.,  
Commissioner of the Superior Court

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Petitioner</b>	<input checked="" type="checkbox"/> E-mail	C-Tec Solar, LLC	<p>Lee Hoffman, Esq. Pullman &amp; Comley 90 State House Square Hartford, CT 06103-3702 (860) 424-4315 <a href="mailto:lhoffman@pullman.com">lhoffman@pullman.com</a></p> <p>Michael Morrison C-Tec Solar, LLC 1 Griffin Road South Suite 200 Bloomfield, CT 06002 (860) 580-7174 ext. 121 <a href="mailto:michael.morrison@ctecsolar.com">michael.morrison@ctecsolar.com</a></p>
<b>Grouped Resident Parties (granted on 04/11/24 and 04/25/24)</b>	<input checked="" type="checkbox"/> E-mail	<p>Monique Pezic 178 Foster Street South Windsor, CT 06074 (860) 372-8138 <a href="mailto:mjpezic@gmail.com">mjpezic@gmail.com</a></p> <p>Kathryn Hale Jonathan Hale 54 Orchard Hill Drive South Windsor, CT 06074 (860) 416-3543 <a href="mailto:Kathrynshale@gmail.com">Kathrynshale@gmail.com</a> <a href="mailto:Jbhale1@cox.net">Jbhale1@cox.net</a></p>	
<b>Party (granted on 04/25/24)</b>	<input checked="" type="checkbox"/> E-mail	Town of South Windsor	<p>Richard D. Carella, Esq. Updike, Kelly &amp; Spellacy, P.C. 225 Asylum Street, 20th Floor Hartford, CT 06103 (860) 548-2681 <a href="mailto:rcarella@uks.com">rcarella@uks.com</a></p>