

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
A PETITION OF NORTH FRANKLIN SOLAR	:	PETITION NO. 1626
ONE, LLC AND VEROGY HOLDINGS, LLC d/b/a	:	
VEROGY, LLC FOR A DECLARATORY RULING	:	
FOR THE PROPOSED CONSTRUCTION,	:	
MAINTENANCE AND OPERATION OF A 4.975	:	
MW AC SOLAR PHOTOVOLTAIC ELECTRIC	:	
GENERATING FACILITY AT 932 ROUTE 32,	:	
FRANKLIN, CONNECTICUT	:	JULY 24, 2024

**RESPONSES OF NORTH FRANKLIN SOLAR ONE, LLC  
AND VEROGY HOLDINGS, LLC D/B/A VEROGY  
TO CONNECTICUT SITING COUNCIL INTERROGATORIES**

On July 3, 2024, the Connecticut Siting Council (“Council”) issued Interrogatories to North Franklin Solar One, LLC and Verogy Holdings d/b/a Verogy, LLC (“NFSO” or “Petitioner”), relating to Petition No. 1626. Below are the Petitioner’s responses.

Notice

Question No. 1

Has North Franklin Solar One, LLC (NFSO) received any comments since the petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.

Response

No.

Project Development

Question No. 2

If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?

Response

The following permits will be required for construction and operation of the NFSO Facility. The Petitioner will obtain and hold the permits in its name.

- a. Connecticut Department of Energy and Environmental Protection, General Permit for the Discharge of Stormwater and Dewatering Wastewater from Construction Activity.
- b. Town of Franklin, Building Permit.
- c. Town of Franklin, Electrical Permit.

Question No. 3

What is the estimated cost of the project?

Response

The estimated cost of the NFSO Project is between \$9M to \$10M.

Question No. 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?

Response

No.

Question No. 5

If NFSO transfers the facility to another entity, would NFSO 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?

Response

Yes. If the Petitioner chooses to transfer the NFSO Facility, it would do so subject to a requirement that the transferee comply with all regulatory permits and approvals in place at the time of transfer. Contact information for the new ownership entity would also be provided to the Council.

Proposed Site

Question No. 6

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. Referencing Petition pp. 6 and 7, is the “Project area” described in the Petition synonymous with the facility “site?” Explain.

Response

Please see Appendix B Plan Sheets 2.10 thru 2.14 of the Petition for a depiction of the “Site” which includes the area within the Limits of Disturbance (“LOD”) line shown. This area includes a specified boundary, access to the solar facility and electrical interconnection locations.

Question No. 7

What is the length of the lease agreement with the property owner? Describe options for lease extension(s), if any.

Response

The lease is for twenty (20) years with the option for up to three (3) additional five-year extensions.

Question No. 8

Referencing Petition p. 26, NFSO notes that, “The project proposes no agricultural uses besides the routine vegetation maintenance by goats.” Does the lease agreement with the property owner contain provisions for agricultural co-uses at the site? If yes, describe the co-uses.

Response

The Petitioner wishes to correct this incorrect reference to “routine vegetation maintenance by goats”. NFSO is not proposing any agricultural co-uses at this Site. As described in Appendix D, the Operations and Maintenance Plan, Section 6.3.1, vegetation will be managed by routine mowing.

Question No. 9

Referencing Petition p. 13 and Appendix E, in the lease agreement with the property owner, what are the provisions related to decommissioning or site restoration at the end of the project’s useful life? Please describe and/or provide any such provisions.

Response

The lease agreement contains provisions that require the Petitioner, upon expiration or termination of lease, to remove, at its expense, all fixtures and equipment and restore the property to substantially the same condition that existed on the commencement date of the lease.

Question No. 10

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?

Response

As discussed in response no. 8 above, NFSO is not proposing any agricultural co-uses at

this Site.

Question No. 11

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?

Response

Yes, the Property is currently a part of Connecticut's Public Act 490 Program. It is possible that once Project construction is completed, the portion of the parcel that contains the solar facility may no longer be eligible for farm, forest or open space classification under Public Act 490 Program. If the Petition is approved by the Council, NFSO will meet with the Town of Franklin Assessor, to determine how the Town will treat the project area for tax purposes.

Question No. 12

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?

Response

No.

Question No. 13

Is the host parcel subject to any development restrictions?

Response

No.

Question No. 14

If the project is sold and/or transferred to another entity, would the sale and/or transfer

include management and maintenance of the agricultural co-use areas?

Response

Yes, to the extent that such permitting and leasing obligations exist, they would be transferred to any subsequent owners of the NFSO Facility. As discussed above, however, no agricultural co-uses are planned.

Question No. 15

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 utility trench.

Response

The nearest property line to the solar field perimeter fence is for the adjacent vacant Parcel 53-17 (no physical address), owned by Land & Sea Resources, and is located 46 feet north of the solar field perimeter fence. The nearest off-site residence located on property at 1182 Windham Road (CT Rt. 32) is approximately 1,900 feet west of the solar field perimeter fence and approximately 1,500 feet northwest of the proposed utility trench. The nearest property line to the utility trench is for Parcel 53-3-9 (no physical address), owned by WR Junction LLC, and is immediately adjacent to the property line.

Proposed Facility and Associated Equipment

Question No. 16

Referencing Petition p. 8, would any upgrades be necessary to the existing paved and gravel access road between Route 32 and the proposed solar facility double-swing gate?

Explain.

Response

It is not anticipated that upgrades will be necessary to the existing paved and gravel

access road, as it is currently utilized by heavy equipment and vehicles for both the former quarry at the Property and an active quarry located further to the east.

Question No. 17

Referencing Petition, pp. 8 and 36 and Appendix B, Sheet 2.12, would the approximately 40 inverters each be located on the equipment concrete pads or free standing on posts next to the equipment concrete pads? Explain.

Response

The Project inverters will be attached to free standing posts adjacent to the concrete equipment pads. The ground surface beneath the free-standing posts will consist of compacted gravel.

Question No. 18

What is the approximate angle with the horizontal that the solar panels would be oriented at?

Response

The panels will be oriented at 25-degree angle.

Question No. 19

What are the minimum and maximum clearances between the bottom edge of the solar panels and grade? What is the maximum height from grade to the top edge of the solar panels?

Response

The clearance from the bottom edge of the panels will vary with the topography but should be no more than approximately three (3) feet. The height of the top edge of the panels above grade will also vary with the topography but will be generally approximately ten (10) feet above grade.

Question No. 20

What factors determined the use of goats to maintain vegetation at the site rather than sheep or periodic mowing?

Response

Please refer to the Petitioner's response to Interrogatory No. 8.

Question No. 21

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, including the goats?

Response

Most of the wiring will be run on the racking system itself. Where wiring is not run on the racking, it would run inside protective conduit. All Facility wires are weatherproof and rated up to 194° F.

Question No. 22

Referencing Petition Sheet 2.12, list the equipment that would be installed on the two proposed equipment pads.

Response

Only the project transformers will be installed on concrete equipment pads. The inverters and other equipment will be attached to free standing posts adjacent to the concrete equipment pads. The ground surface beneath the inverters and other equipment will consist of compacted gravel.

Energy Output

Question No. 23



Referencing Petition p. 3, has NFSO executed a Tariff Terms Agreement (TTA) with Eversource? Would NFSO also sell the renewable energy certificates (RECs) to Eversource? Would the TTA include the transfer of capacity to Eversource?

Response

NFSO was awarded a contract in the Year 4 Shared Clean Energy Facility Program (SCEF) auction in 2023. NFSO executed a SCEF Tariff Terms Agreement with Eversource for a term of 20 years and for the purchase and sale of electricity and renewable energy certificates (RECs). On June 7, 2023, PURA issued their approval of the selected Year 4 SCEF projects. NFSO or the “Subscriber Organization” does not own capacity rights under the SCEF Tariff Terms Agreement.

Question No. 24

Referencing the November 7, 2023 NFSO letter to DOAg, Section 2b, the percentages of energy production to be delivered to various customer groups under the Shared Clean Energy Facility (SCEF) program are provided. Would the percentages remain approximately the same on a capacity (rather than energy) basis?

Response

The production of the proposed solar facility will be delivered to the utility (Eversource) as total energy (kilowatt hours) and then Eversource allocates the energy based on their management of subscribers to the SCEF program. Therefore, there is no discernible way for NFSO to determine if the same allocation occurs on a capacity (kilowatt) basis.

Question No. 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 the SCEF Agreement.

Response

No battery storage system is currently contemplated for the NFSO project. Depending on state or federal programs encouraging battery storage systems in the future, the site plan could be modified to accommodate a battery storage system.

Question No. 26

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?

Response

Yes, only the DC panels or DC to AC inverters for the affected area would shut down. The remaining portion of the system would continue to operate and generate power. Sections of the solar facility are electrically isolated by the grouping of DC panels to the DC to AC inverters, and the AC inverters are electrically isolated via breakers and disconnect switches.

Question No. 27

Would NFSO participate in an ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?

Response

No. NFSO will not participate in the ISO-NE Forward Capacity Auction, as Eversource owns the capacity rights of any SCEF program facility. However, at the conclusion of the SCEF tariff, NFSO may choose to participate in the ISO-NE Forward Capacity Auction or a similar capacity program available at that time.

Question No. 28

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?

Response

Yes, electrical loss assumptions have been factored into the output calculation provided in the Petition. The output at the point of interconnection is estimated to be approximately 4.9 MW AC.

Question No. 29

If the facility operates beyond the terms of the SCEF Agreement, will NFSO decommission the facility or seek other revenue mechanisms for the power produced by the facility?

Response

The Petitioner may continue to operate the Facility beyond the term of the SCEF agreement if another revenue mechanism for energy output is available at that time.

Question No. 30

Would NFSO 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.

Response

NFSO was awarded a SCEF contract that calls for a 4.975 MW AC facility to be installed at the Site. NFSO believes the design, as currently presented, meets this obligation in the most efficient way possible with minimal environmental effect. Reducing the solar array footprint would impact NFSO's ability to meet its contract requirements. In addition, the row spacing for the NFSO project is already constrained. Narrowing the spacing further would result in shading of the panels and reduced output.

## Electrical Interconnection

### Question No. 31

Provide the line voltage of the proposed electrical interconnection.

### Response

23 kV.

### Question No. 32

Does the interconnection require a review from ISO-NE?

### Response

Yes. The project was reviewed by ISO-NE as part of the interconnection application and system impact study process with Eversource and was approved by both ISO-NE and Eversource accordingly.

### Question No. 33

Referencing Petition p. 9, what is the status of the final distribution impact study?

### Response

The final distribution impact study results were received and are consistent with the preliminary results received and described on page 9 of the Petition narrative.

### Question No. 34

Referencing Petition p. 9, what is the status of the transmission impact study and the interconnection agreement with Eversource?

### Response

The transmission impact study was completed and Eversource issued an Interconnection Agreement on April 5, 2024.

### Question No. 35

Will the interconnection provide energy to a substation? If yes, which one?

Response

Energy will be delivered to the Eversource distribution grid circuit that is designated as 11F12, which feeds to the 11F Card Street bulk substation. NFSO cannot determine if energy delivered to a utility's distribution circuit will provide energy to this or any given substation or if the energy will be consumed within the distribution circuit.

Question No. 36

Referencing Petition p. 8, NFSO notes that, "...[T]he existing utility poles on the access road would be utilized to make the overhead service connection to the utility grid." What are the approximate heights above grade of these poles?

Response

The poles are approximately 40-45 feet in height above grade.

Question No. 37

Referencing Petition p. 9, NFSO indicates that five new utility poles would be installed: three NFSO poles and two Eversource poles. Sheet 2.11 indicates that there would be two NFSO poles and three Eversource poles. Please clarify how many poles would be customer-side or controlled by NFSO and how many poles would be utility-side or controlled by Eversource? Clarify what equipment would be on each pole. Provide the heights of the five proposed poles.

Response

Page 9 is accurate in describing the installation of two poles by Eversource and three poles by NFSO. Sheet 2.11 will be revised to match this accordingly. The first Eversource pole will contain a recloser and the second Eversource pole will contain a primary meter. The first NFSO pole will contain a disconnect switch; the second NFSO pole will contain a customer

recloser; and the third NFSO pole will contain a customer meter and riser to transition from overhead to underground service. The poles will be 40-45 feet above grade.

Question No. 38

Referencing Sheet 2.11, would the northeastern-most proposed pole be a riser pole to convert the underground electrical interconnection line to overhead?

Response

Yes.

Question No. 39

Referencing Sheet 2.11, is three-phase available on the existing overhead distribution line where the “Proposed Interconnection Point” is located, or would it need to be upgraded from single-phase to three-phase?

Response

Yes, three-phase service is available. Therefore, upgrading the service is not necessary.

Question No. 40

Has NFSO discussed with Eversource the possibility of reducing/minimizing the number of poles required for the interconnection? Explain. Provide cost estimates for both an overhead and underground interconnection.

Response

The Petitioner has not had such a discussion with Eversource about the NFSO project but has had similar discussions with them regarding prior projects approved by the Council.

Eversource dictates the number of poles that are required to make the interconnection and to install the necessary metering and protective equipment. The proposed NFSO interconnection plan represents the minimum number of poles required by Eversource. Eversource’s cost for the

new service connection will be approximately \$250,000 based on our experience. A specific breakdown of just the new service costs was not provided as part of the Interconnection Agreement as it included other required system upgrades. NFSO does not have any cost information related to using pad-mounted equipment from Eversource. It is, however, our experience that pad-mounted equipment is significantly more expensive than overhead equipment. In response to condition of approval no. 8 for the Glastonbury Solar One project (Petition No. 1602), NFSO contacted Eversource, who indicated that they “do not install pole-mounted reclosers” and that “pad mounted meters require additional cost and a 12–16-month lead time”.

#### Public Health and Safety

##### Question No. 41

Would the project comply with the current Connecticut State Building Code, National Electrical Code, Connecticut State Fire Prevention Code?

##### Response

Yes.

##### Question No. 42

What are industry Best Management Practices for Electric and Magnetic Fields at solar facilities? Would the site design conform to these practices?

##### Response

The Petitioner is not aware of any industry Best Management Practices for Electric and Magnetic Fields at solar facilities that connect to the existing distribution system such as the NFSO project. We would also like to direct the Council to the report provided by Exponent that addressed this concern for the similar Burlington Solar One project. That report indicates that

there were no EMF concerns for that project. The Burlington Solar One project was approved by the Council and is currently in service (see Docket No. 497, Petition No. 1437, [https://portal.ct.gov/CSC/1\\_Applications-and-Other-Pending-Matters/Applications/3\\_DocketNos400s/Docket-No-497---Burlington-Solar-One](https://portal.ct.gov/CSC/1_Applications-and-Other-Pending-Matters/Applications/3_DocketNos400s/Docket-No-497---Burlington-Solar-One))

Question No. 43

Referencing Petition p. 16, 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? How would site access be ensured for emergency responders?

Response

Yes, the Petitioner is prepared to provide assistance and/or training to local emergency responders. NFSO will either provide emergency responders with a key to the project access gate or use of a “knox box”. Please refer to Section 6.1 of Appendix D.

Question No. 44

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?

Response

In the event of a fire or emergency, the Facility will be able to be shut down by emergency responders via a physical disconnect switch that will be appropriately labeled pursuant to the requirements of the National Electric Code. The Petitioner is not aware of any specific media and/or specialized equipment that is needed to extinguish a fire within a solar facility. Generally speaking, electrical fires are allowed to burn themselves out, with water being used only on the surrounding areas to prevent the spread of any fire beyond the affected area.



Question No. 45

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?

Response

No municipal hydrants exist in the area around the NFSO project site. The Petitioner is not familiar with and therefore cannot comment on alternative water sources that might be available to the Franklin Volunteer Fire Department.

Question No. 46

Would firewater or other runoff from a solar panel/electrical fire be considered hazardous and require cleanup by a hazardous materials response contractor?

Response

According to the TCLP report contained in Appendix A of the Petition, the Petitioner does not anticipate that any such runoff would be considered hazardous material.

Question No. 47

What type of insulating oil is used within the transformers? Is it biodegradable? Do the transformers have containment systems in the event of an insulating oil leak? Would the transformers have low oil alarms?

Response

The transformers will utilize FR3 fluid which is derived from over 95% renewable vegetable oil and is non-toxic. The transformers do not have an oil containment system. They do maintain liquid level gauges that can be ordered with contacts. NFSO can monitor these contacts through the facility monitoring platform. NFSO will add remote monitoring of leak detection to

the Project.

Question No. 48

Petition p. 37 indicates that “A glare analysis is not required at this time.” Under what circumstances would a glare analysis be required in the future? Explain.

Response

Under current FAA standards, a glare analysis is not required and therefore, has not been prepared. If the FAA standards change in the future and a glare analysis is required, NFSO will comply with the new standards.

Question No. 49

Would notice to the Federal Aviation Administration (FAA) be necessary for the temporary use of a crane during construction?

Response

NFSO utilized the FAA Notice Criteria Tool to evaluate the possible use of a crane and it was determined that no other action is required. (See the diagram below).

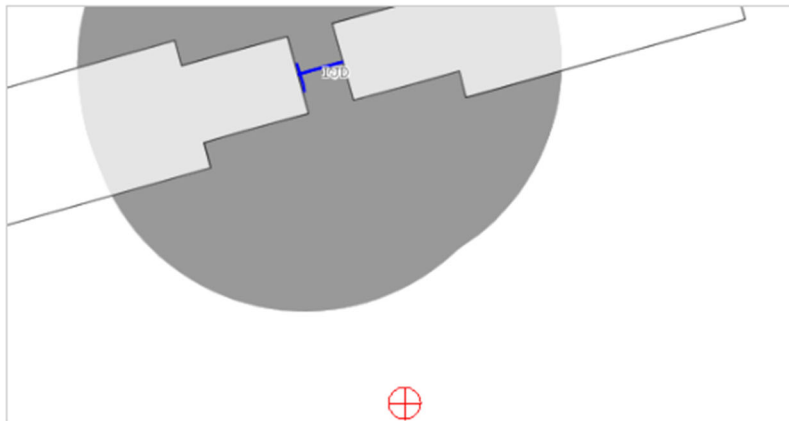
The tool below will assist in applying Part 77 Notice Criteria.

\* Structure Type:    
Please select structure type and complete location point information.

Latitude:  Deg  M  S    
Longitude:  Deg  M  S    
Horizontal Datum:    
Site Elevation (SE):  (nearest foot)   
Structure Height :  (nearest foot)   
Is structure on airport:  No   
 Yes

### Results

You do not exceed Notice Criteria.



### Question No. 50

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?

### Response

The noise-generating equipment on site is limited to the inverters and transformers. This equipment would not operate at night. As indicated in Section VI.I of the Petition, the project would have a combined inverter bank calculated sound power level of under 85 dBA at one (1) meter. The Inverse Square Law shows that the 85 dBA level would fall to approximately 54.7 dBA at a distance of 107 feet, which is the nearest property line to the southeast of the inverter bank. This value is less than the DEEP allowable limit of 61 dBA. As noted above, the transformers would not have an impact on the cumulative noise and are both below the DEEP limits.

Question No. 51

Referencing Petition p. 36, provide a copy of the previously completed sound analysis.

Response

The previously completed sound analysis was provided with Petition No. 1572 and is available at [https://portal.ct.gov/-/media/csc/3\\_petitions-medialibrary/petitions\\_medialibrary/mediapetitionnos1501-1600/pe1572/petitionersubmissions/petition-no-1572---environmental-and-community-noise-assessment\\_a.pdf](https://portal.ct.gov/-/media/csc/3_petitions-medialibrary/petitions_medialibrary/mediapetitionnos1501-1600/pe1572/petitionersubmissions/petition-no-1572---environmental-and-community-noise-assessment_a.pdf)

Question No. 52

Referencing Petition p. 36, NFSO notes that, per manufacturer's specifications, an inverter would generate a maximum sound level of less than 65 dBA at a distance of 1 meter. Referencing Petition p. 8, has NFSO accounted for the combined effects of thirty-nine 125 kW inverters, one 100 kW inverter and two 2,500 kVA transformers in its noise projections?

Explain.

Response

Yes, the Petitioner has accounted for the combined effect of the inverters as noted on p. 36 where it is stated that "Per a previously completed sound analysis, a combined inverter bank has a calculated sound power level of under 85 dBA at a distance of one (1) meter."

Question No. 53

Referencing Petition p. 26, provide a Goat Grazing Plan that includes, but is not limited to:

- a. Environmental Notes on Sheet 3.01, Post Construction, indicate that mowing would generally be avoided from May 15 to September 15 unless protective measures are employed. When would the goats be on-site?

- b. Identification of flock protection animals such as dogs, llamas or donkeys, if necessary;
- c. How do goats interact with wood turtles and eastern pearlshell mussels?
- d. How many days per week would the goat manager visit the site to tend to the goats?
- e. How would goats be managed if electrical contractors/personnel were dispatched to the site for nonscheduled maintenance or emergency repair work?
- f. Provide a copy of a sample sign for contact information for the goat manager and DOAg Animal Control Officer and the location where it would be prominently displayed on the fence at the facility.
- g. How would water be provided at the site for the goats?

Response

Please refer to NFSO's response to Interrogatory No. 8.

Environmental Effects and Mitigation Measures

Question No. 54

Could livestock manure affect the water quality of downgradient wetlands/watercourses?

How can such effects be mitigated?

Response

Please refer to NFSO's response to Interrogatory No. 8. The Petitioner will not utilize any livestock at the project site.

Question No. 55

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 NFSO manage and/or mitigate these impacts?

Response

Posts will be driven into the ground to a depth of approximately 8-10 feet. The actual depth will be determined by the racking manufacturer's structural engineer. The posts will be

driven into the ground utilizing a pile driving machine. There are no anticipated ground water impacts from Facility construction. Installation of the racking system is not expected to cause sediment releases, disrupt well water flow or impact well water quality.

Question No. 56

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?

Response

According to the Connecticut Department of Health's Public Water Supply Map (see below) the parcels immediately adjacent to the project limits to the west, north, and east do not contain any type of water service and that the portion of the subject parcel to the southwest that is outside of the project limits is served by a private well. Further to the north on Route 32 is an area in South Windham that is currently served by a Community Public Water System. Based on the depth of groundwater on the project site, the depth to which the posts will be driven, and the relevant distance to any of the nearest water supply sources, it is not anticipated that vibrations from post installation will affect well function and/or water quality.

# Public Water Supply Map

DPH Connecticut's Drinking ... 931 Route 32, North Franklin, CT

Legend Layers Basemap gallery Measure Details Share

Layers

- Service Areas of Community Public Water Systems
- Aquifer Protection Areas
- Drinking Water Watersheds
- Private Well Parcels
- Exclusive Service Areas (as of Jan. 2000)

Legend Opacity

# Public Water Supply Map

DPH Connecticut's Drinking ... 931 Route 32, North Franklin, CT

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Layers

- Service Areas of Community Public Water Systems
- Aquifer Protection Areas
- Drinking Water Watersheds
- Private Well Parcels
- Exclusive Service Areas (as of Jan. 2000)

Legend Opacity

Question No. 57

Describe the visibility of the proposed facility from Windham Road (Route 32) and from the nearest off-site residence.

Response

As described in section VI.M (page 37) of the Petition narrative, the proposed facility should not be visible from Windham Road or from the nearest off-site residence due to the combination of distance, natural topography, and significant established vegetation.

Question No. 58

Could the site host habitat for the tricolor bat?

Response

The subject property supports relatively mature woodlands, which provide potential roost trees for the tricolored bat. Additionally, the subject property supports areas of meadow and edge habitat for insect foraging. However, if the tricolored bat is present on site, the proposed project is not anticipated to have any adverse impacts on the species. With the exception of what may be necessary to establish the interconnection, no tree clearing is proposed, and as such, impacts to potential roost trees would be minimal. Additionally, the proposed project will convert a historic gravel mine to a native meadow, increasing insect pollination opportunities, and thus increasing the quantity of available prey for the tricolored bat.

Question No. 59

Referencing Petition p. 18, the project would occupy approximately 15.4 of 18.4 acres of Cropland/Row Crops. Would the remaining approximately 3 acres be used to grow crops?

Response

NFSO does not control the use of land outside of the project limits. NFSO does not know



how the property intends to use the referenced 3 acres.

Question No. 60

Referencing Petition, Appendix B, Sheet 3.01, the proposed chain link fence would have a 6 inch wildlife gap at the bottom of the fence. Would such gap be compatible with hosting goats at the site? Explain.

Response

Please refer to NFSO's response to Interrogatory No. 8.

Question No. 61

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).

Response

See Attachment 1.

Facility Construction

Question No. 62

Provide the range of final slopes within the solar array area.

Response

The slopes throughout the array generally range from 1%-4% with a small area of steeper slopes, ranging from 4%-14%, located in the western side of the array.

Question No. 63

Referencing Petition p. 9, has NFSO 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.

Response

Petitioner met with CTDEEP Concierge team, including the Stormwater Division, on March 5, 2024. No specific recommendations, comments, or concerns were outlined from the Stormwater Division at that meeting.

Question No. 64

Estimate the amounts of cut and fill in cubic yards to develop the facility. If there is excess cut, will this material be removed from the site property or deposited on the site property?

Response

There is minimal earthwork proposed for the installation of the solar array. The excavation associated with the gravel access drive, gravel equipment area and concrete equipment pads will result in approximately 150 cubic yards of cut, which can be spread throughout the site, as needed, to facilitate positive drainage patterns.

Question No. 65

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?

Response

A comprehensive geotechnical study has been completed and it was determined that the site conditions will support the overall project design. Geotechnical borings were conducted between 12/28/23 and 1/2/24 and did not require any tree clearing. The report was received in January 2024. Per the report, soil and groundwater conditions were encountered that can support the proposed posts to support the solar array using driven piles and/or ground screws.

Question No. 66

Referencing Petition p. 32, 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?

Response

No, blasting will not be required, and no bedrock or ledge was encountered in any of the

geotechnical borings that were conducted.

Question No. 67

Referencing Petition Appendix B, Sheet 2.31.4, it states, “Contractor to clear of all trash and debris within project area.” What is the composition of the trash and debris?

Response

This is a general note that perhaps should have stated that “if” trash or debris is encountered by the contractor upon mobilization to begin on-site construction, it shall be the contractor's responsibility to remove and dispose of properly. NFSO is not aware of any such trash or debris on-site within the project area that would need to be removed.

Facility Maintenance/Decommissioning

Question No. 68

Would the inverters last the life of the project? If not, at what time intervals would the inverters need to be replaced?

Response

The inverters would not likely last for the projected 20–35-year life of the Project. The inverters typically carry a warranty for 15-20 years. Therefore, it is anticipated that the inverters will likely need to be replaced once during the life of this project.

Question No. 69

Referencing Petition p. 13 and Appendix D – Operations and Maintenance Plan, Table 2, would regular mowing still be expected to be required with grazing goats at the site?

Response

Please refer to NFSO’s response to Interrogatory No. 8.

Question No. 70

Would replacement modules be stored on-site in the event solar panels are damaged or are not functioning properly? If yes, in what location?

Response

No.

Question No. 71

Referencing Petition Appendix E, 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.

Response

NFSO has previously consulted with services such as WeRecycleSolar.com that provide tools for estimating the Value Recovery of the materials at the end of life and/or upon decommissioning of ground mounted solar arrays. The recovery value of the materials was found to exceed the cost of the labor and materials required to remove the equipment.

Question No. 72

Does the DOAg or other entity oversee livestock grazing operations in the state? Do livestock farmers have to be certified by DOAg or other entity? What certifications are required?

Response

Please refer to NFSO's response to Interrogatory No. 8.