PETITION OF LSE SEXTANS LLC AND LSE SEXTANS II LLC ("LODESTAR ENERGY") FOR A DECLARATORY RULING THAT NO CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED IS REQUIRED FOR THE CONSTRUCTION, OPERATION, AND MAINTENANCE OF A 3.0 MW SOLAR PHOTOVOLTAIC FACILITY IN TORRINGTON, CONNECTICUT

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STATE OF CONNECTICUT SITING COUNCIL

PETITION OF LSE SEXTANS LLC AND LSE SEXTANS II LLC
PETITION NO. _____
FOR A DECLARATORY RULING
THAT NO CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED IS
REQUIRED FOR THE CONSTRUCTION,
OPERATION, AND MAINTENANCE OF
A 3.0 MW AC SOLAR PHOTOVOLTAIC
FACILITY IN TORRINGTON, CONNECTICUT **August 14, 2024**

I. INTRODUCTION

Pursuant to Conn. Gen. Stat.§§ 4-176 and 16-50k(a) and Conn. Agencies Regs. § 16- 50j-38 *et seq.,* LSE Sextans LLC and LSE Sextans II LLC, both Connecticut limited liability companies (collectively "Lodestar" or "Petitioner") requests that the Connecticut Siting Council ("Council") approve by declaratory ruling the location, construction, operation, and maintenance of a 3.0 MW solar photovoltaic facility, and associated equipment ("Project") occupying a total of approximately 13.59 acres of fenced-in solar panels. The Facility is a fixed tilt system. There are two arrays, which have received two separate Non-Residential Renewable Energy Solutions ("NRES") tariff agreements. Because the two (2) arrays are on adjacent properties, they will be constructed together, will be in the same fenced area, and the Petitioner is filing both arrays under one petition. The southern array ("Array 1") is associated with LSE Sextans LLC and the northern array ("Array 2") is associated with LSE Sextans II LLC.

The total site spans about 17.19 acres (inclusive of two arrays of solar panels, transformers, electrical switchgear, monitoring equipment, and access roadways) (the "Site") to be constructed on two parcels on the east side of Lovers Lane in the City of Torrington that total approximately 54.08 acres (the "Property"). The two parcels are located on Lovers Lane, (assessor's parcel ID 221-3-1 and 222–4-26). The Site vehicular access to the array will extend

east off Lovers Lane. The Site interconnection access will be to the north, off a paved driveway associated with the Country Woods condominium complex. Currently, most of the Site is a mix of forest and agricultural fields.

Conn. Gen. Stat. § 16-50k(a) provides:

> Notwithstanding the provisions of this chapter or title 16a, the council shall, in the exercise of its jurisdiction over the siting of generating facilities, approve by declaratory ruling... the construction or location of any customer-side distributed resources Project or facility or grid-side distributed resources Project or facility with a capacity of not more than sixty-five megawatts, as long as such Project meets air and water quality standards of the Department of Energy and Environmental Protection.

The energy is being sold through a net metering agreement to the City of Hartford at a discount to offset their energy costs. The City of Torrington will get direct tax benefits from the Facility.

As discussed in this petition, the Petitioner's goal is to design an environmentally compatible Project that produces the maximum amount of energy while avoiding and minimizing adverse environmental impacts. Based on the information presented herein, the Project will not have a substantial adverse environmental impact on the immediate and surrounding area. Accordingly, the construction, operation, and maintenance of the Project satisfies the criteria of Conn. Gen. Stat. § l6-50k(a).

II. PETITIONER

Lodestar is a Connecticut-based limited liability company that develops renewable energy projects in Connecticut and across New England. Lodestar's principal place of business is located in Avon, Connecticut at 40 Tower Lane, Suite 201. Lodestar will lead the Project's development, construction and financing and plans to be the long-term owner and operator of the Project. Lodestar has worked with utilities, school districts, cities, housing authorities, counties,

private businesses, commercial and governmental clients to develop more than 125 MW of solar projects with a value of more than $350 million across the Northeastern US, including eleven (11) projects in Connecticut. Of the eleven, two were recently approved by the Council (petition #1557 and petition #1544) and one is pending (petition #1611).

Please address all correspondence and/or communications regarding this Petition to:

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III. PROPOSED PROJECT

A. PROJECT BACKGROUND

In developing this Project, the Petitioner has taken into account the State's energy policy and goals to "develop and utilize renewable energy resources, such as solar and wind energy, to the maximum practicable extent." Conn. Gen. Stat. § 16a-35k. As a solar development, the proposed Project is considered a Class I renewable energy source under Conn. Gen. Stat. § 16-1(a)(26).

The Project, upon approval, will participate in the statewide Non-Residential Renewable Energy Solutions ("NRES") Program. The NRES program is a successor program to the Low Emission Renewable Energy Credit and Zero Emission Renewable Energy Credit (LREC/ZREC)

and Virtual Net Metering (VNM) programs with the objectives to foster the sustained, orderly development of the state's Class I renewable energy industry and to encourage the participation by customers in underserved and environmental justice communities, among others. Lodestar has been awarded eleven (11) contracts under the NRES Program across the first two (2) years, including the two arrays in this Project. NRES plays an important role in the renewable energy goals by the State of Connecticut by providing the benefits of the clean renewable energy in the form of on bill-credits to state, agricultural, or municipal customers, generating substantial savings for such entities over a 20-year term.

B. SITE SELECTION

Lodestar and its experienced development team have designed the proposed development on the Project Site to minimize or avoid any potential environmental impacts. Those criteria included:

- Location suitability (size, topography, and apparent lack of biological and hydrological conflicts in initial fatal flaw screening);
- Proximity of existing electrical infrastructure and the approval to interconnect to this infrastructure from EDC; and
- Maximizing the site benefits, including utilizing disturbed areas and minimizing the tree removal required.

On July 20, 2023, Petitioner attended a pre-application meeting with the Department of Energy and Environmental Protection ("DEEP") and DEEP did not raise any specific concerns about the Project.

As noted above, the Project will be part of the NRES program through Eversource. During the site selection and evaluation process, Lodestar has retained the following consultants to assist in the evaluation and design of the Project:

- All-Points Technology Corp., P.C. ("APT") – civil engineering, stormwater design, environmental assessment
- Heritage Consulting – archeological consulting
- ArcDesign – interconnection design and medium voltage analysis

C. PROPERTY DESCRIPTION

The Project will occupy ±17.19 acres. The array will be interconnected via the existing paved road associated with the Country Woods condominium association via an existing Eversource easement across that parcel. Vehicle access to the array will extend east off Lovers Lane. The Property's existing topography slopes down from south to north, ranging from approximately 1,013 feet above mean sea level ("AMSL") to 817 feet AMSL. The surrounding area includes a mix of agricultural fields, residential development, and the City's Major Besse Park which is mostly undeveloped land.

D. PROJECT DESCRIPTION

If this Project is approved by the Siting Council, Lodestar will proceed to construct, operate, and maintain the solar facility at the Project Site. Upon its completion, the solar electric energy generating facility (the "Facility") will consist of two (2) arrays with a total of 7,570 photovoltaic modules ("Panels") and associated equipment. A fixed tilt racking system will be used to secure the panels. Construction of the Project will require 10.86 acres of tree clearing and another 0.97 acres of tree cutting for shading purposes. Once complete, the Facility will

occupy approximately 13.59 acres inside the fence, with an additional 3.6 acres of improvements beyond the fenced limits, for a total Project area of ±17.19 acres. The seven-foot security fence will be raised six (6) inches off the ground to allow for animal migration. Emergency access will be available via Lovers Lane and will be designed in accordance with local requirements to accommodate emergency vehicles and fire trucks.

The Panels will be mounted on a driven post racking system at a 25-degree fixed tilt facing south to maximize energy production. The maximum height of the Panels will be approximately eleven (11) feet. The image below is an example of the type of Panels and racking system that will be utilized.

Inverters will be mounted at the centralized pad location, where small concrete pads will also be installed for transformers and switchgear. At the end of the operational life of the Project, Lodestar will remove all equipment (*e.g.* racking system, Panels, inverters, electrical collection system, equipment pads, etc.) from the Project Site, will recycle all recyclable materials, and will dispose of all non-recyclable materials in accordance with applicable law.

Lodestar will install the Project in the area shown on the Site Plans in **Exhibit 1**. The image below is an example of a similar solar array field installed by the Petitioner.

The Project construction period is estimated to take approximately 6-9 months from issuance of all required permits, due to the required growing season between periods of disturbance. Subject to regulatory approval, Petitioner anticipates commencing construction in Q2 2025 or upon approval from the Siting Council.

Project Schedule:

Task	Approximate Duration
Mobilization and site preparation	2 weeks
Civil work: road construction, tree clearing, grading and stormwater controls	4-8 weeks
Site Stabilization	8-12 weeks
Racking, panel & electrical installation	8 weeks
Interconnection and medium voltage	3 weeks
System testing	1 week
Approvals & commissioning	2 weeks

E. UTILITIES AND INTERCONNECTION

Lodestar proposes interconnecting the Project to an existing 13.8 kV overhead circuit that runs along Lovers Lane on the western edge of the Property, which is part of Eversource's distribution system. Lodestar previously completed an interconnection application and

Eversource determined that the distribution circuit located along Lovers Lane is suitable for the additional output from the Project. Completion of the interconnection impact studies has resulted in approval to move forward with an interconnection agreement, which will allow the Project to interconnect in the manner set forth above.

Eversource's interconnection of the array will require the installation of two sets of three (3) new poles, located in the vicinity of the northern end of the Property off of the driveway associated with the Country Woods condominium as seen in **Exhibit 1**. For each interconnection, Eversource will own and install a riser for the first new pole, a pole-mounted recloser on the second new pole, and a pole-mounted primary meter at the third new riser pole, which will direct the interconnection circuit underground to a customer-owned pad-mounted switchgear. The point of common coupling ("POCC") will be on the load side of the primary metering cluster. The interconnection will continue underground to the two equipment pads located to the west of the arrays. This is a similar process and configuration that has been used on all of Lodestar's previous projects across Connecticut.

F. LOCAL INPUT & NOTICE

Lodestar has actively sought input from the City of Torrington and remains committed to providing the City with as much information regarding the Project as possible. Lodestar met with members of the Torrington Planning Department September 6, 2023 to share an initial site plan and Lodestar sent updated plans to the City on April 26, 2024. Lodestar addressed the City's questions regarding the layout and the process. Lodestar met with the Country Woods Condominium Association on July 1, 2024 and July 22, 2024 to notify them of the Project and associated interconnection work.

Additionally, as required by the Regulations of Connecticut State Agencies § 16-50j-40(a), Lodestar provided notice of this petition to all required persons and appropriate municipal officials and governmental agencies. Attached as **Exhibits 5 and 6** are copies of the certifications of service to abutters and required officials respectively.

IV. EQUIPMENT AND ENERGY PRODUCTION

The design of the Project focuses on maximizing the efficiency of the system based on existing conditions of the Site and local weather patterns while, at the same time, minimizing environmental impacts. Within this layout, approximately 7,570 photovoltaic modules will be installed at a 25-degree fixed tilt with an azimuth of 180 degrees south. The array will feed 18 (18) Solectria XGI 1500-166/166 inverters for a total output of approximately 3.0 MW.

Eversource reviewed the Project's designed output during their system impact study process. Eversource determined that the distribution circuit located along Lovers Lane is suitable for the additional output from the Project. This incremental clean energy generation will help the state of Connecticut meet its renewable energy goals and improve local grid resiliency by providing distributed energy where it is needed.

The operational life of the Project is based on the designed life expectancy of the equipment. The equipment for the Project consists of modules, racking and inverters. Photovoltaic modules and racking equipment have a designed life and warranty extending for twenty (20) years or greater. The inverters have a designed life and warranty of approximately ten (10) years or greater. Therefore, the anticipated operational life of the Project is twenty (20) plus years. At the end of the operational life of the Project, Lodestar will remove all equipment (*e.g.* racking system, Panels, inverters, electrical collection system, etc.) from the Project Site,

recycle all recyclable materials and dispose of all non-recyclable materials in accordance with applicable law. See **Exhibit 4.**

In the event of a fault or power outage within the solar facility and/or the Lovers Lane distribution circuit, the Project is required to be isolated from the distribution circuit per IEEE standard 1547 and UL standards 1741 and 1741SA. The Project's inverters continuously monitor for deviations in frequency, current and voltage outside of Eversource's parameters. If a fault is detected, the inverter automatically restricts the Project from production. The equipment specifications for the proposed equipment are attached hereto as **Exhibit 2**.

V. NO SUBSTANTIAL ENVIRONMENTAL IMPACTS

Conn. Gen. Stat. § 16-50k (a) provides that a Certificate is not required if an electric generating facility meets the air and water quality standards of the Department of Energy and Environmental Protection ("DEEP") and does not have a substantial adverse environmental effect. Lodestar engaged various environmental professionals to conduct a comprehensive environmental analysis. See **Exhibit 7** (Environmental Assessment), which includes information regarding the location of the Site, wetland resources, State Historic Preservation Office ("SHPO"), Natural Diversity Database ("NDDB"), Federal Aviation Administration ("FAA") determinations, and noise analysis. Lodestar consulted with CT DEEP and other relevant agencies to evaluate potential environmental impacts. For these reasons and those addressed further below, this Project avoids, reduces, and mitigates potential environmental impacts.

A. AIR QUALITY

The Project will not generate any emissions but rather, as demonstrated in **Exhibit 8**, the Project will contribute to carbon reduction. The Project will have no air emissions during operation and only very minor air emissions of regulated air pollutants and greenhouse gasses

during construction from the conventional construction equipment used to install the Project. Lodestar will control any temporary emissions at the Project Site by enacting appropriate mitigation measures *(e.g.*, water for dust control; avoid mass early morning vehicle startups, etc.).

Accordingly, any potential air effects produced by the Project's temporary construction activities will be *de minimis*. During operation, the Project will produce no regulated air pollutants or greenhouse gasses (*e.g.*, PM, VOCs, GHG or Ozone). No air permit will be required for either construction or operation of the Project.

B. WILDLIFE RESOURCES

As detailed in the Environmental Assessment in Exhibit 7, the Project is not expected to have any negative impact on wildlife resources in the vicinity. In consultation with the DEEP Natural Diversity Data Base ("NDDB"), the wood turtle, a state listed species of special concern, was identified within or in proximity to the Project Area. A Resource Protection Plan has been developed incorporating an educational component for sub-contractors, installation of isolation barriers, and routine sweeps of the Project Area to avoid injury or mortality to this species during construction activities. NDDB's final Determination letter on March 1, 2024, concurred with the proposed turtle protection measures. The Resource Protection Plan is incorporated in plans found in Appendix A.

Federal consultation was completed in accordance with Section 7 of the Endangered Species Act ("ESA") through the U.S. Fish and Wildlife Service's ("USFWS") Information, Planning, and Conservation System ("IPaC"). Based on the results of the IPaC review, federally-listed Endangered species northern long-eared bat ("NLEB"; Myotis septentrionalis) habitat range encompasses the Property. APT determined, and USFWS confirmed, that the Project may

affect, but will not likely adversely affect or result in incidental take of NLEB and does not require a permit from USFWS.

A full review of the Endangered Species Act (ESA) Compliance Determination and USFWS's Response Letter is provided in Appendix C, USFWS and NDDB Compliance Statement.

C. WETLANDS AND WATERCOURSES

APT Registered Soil Scientists identified a portion of one (1) wetland on the Property in proximity to the Project during a field inspection and wetland investigation completed on February 14, 2023. The resource consists of a large forested wetland system that extends off the Property to the south and generally drains in a south to north direction.

No direct wetland impacts will result from the Project. Installation of perimeter fencing and stormwater management basins will encroach into several areas within 100 feet of the wetland but no closer than 50 feet, while solar panels will be no closer than 100 feet to the wetland. A portion of the electrical interconnection will pass below a narrow segment of the wetland, where a jack and bore technique will be employed; jack and bore pits would be positioned at least 50 feet from wetlands and no direct wetland impacts would be associated with this work. Post-development of the Project, a majority of the remaining wetland buffers will consist of established forested vegetation.

The areas of indirect Project impact in close proximity to wetland resources (100 feet and less) occur entirely in areas of existing dense, forested vegetation with a generally low erodibility potential. No areas of the Project would encroach closer than 50 feet from the nearest wetland. The Project is not anticipated to result in a significant negative impact to nearby wetland resources, and any potential secondary wetland impacts will be further mitigated through the

implementation of a Resource Protection Plan. See Appendix A to the Environmental Assessment, Exhibit 7.

D. STORMWATER MANAGEMENT

Petitioner completed a drainage analysis to review pre-and post-development runoff at the Site. As can be seen from the site plans and environmental assessment, construction and operation of the Project at the Site will fully comply with requirements of the Department and Energy and Environmental Protection ("DEEP") stormwater requirements, including Appendix I. The Project will have no adverse environmental effect on surface water quality.

E. FLOODPLAINS

The Facility will not be located within a 100- or 500-year flood zone. The Site is located in an area designated as Zone C, which is defined as an area of minimal flooding, typically above the 500-year flood level.

No special design considerations or precautions relative to flooding are required for the Facility. As no portion of the Facility is proposed to be located in or impact either 100- or 500-year flood zones, no impacts are anticipated to floodplain or downstream areas.

F. DRINKING WATER RESOURCES

The Project is not anticipated to result in any adverse impact to either ground or surface water resources. The Site is not located in an Aquifer Protection Area. A public water system serves the area surrounding the Site. Typical construction techniques for installation of the Facility do not require blasting or other similar measures. Construction and operation of the Facility should have no impact on groundwater resources.

Provided that erosion and sediment ("E&S") controls are installed and maintained in accordance with the Connecticut Guidelines for Soil Erosion and Sediment Control and

stormwater is managed in accordance with the Connecticut Stormwater Quality Manual, no adverse effect on surface water quality is anticipated from development and operation of the Project.

G. HISTORIC RESOURCES

Heritage Consultants performed a Phase 1A investigation and recommended a Phase 1B be completed prior to construction in those portions of the Site identified as possessing moderate to high potential to contain intact archaeological deposits. A Phase 1B investigation was performed that included 67 shovel tests. Recovered artifacts were assessed as not significant applying NRHP criteria for evaluation, and no additional archaeological investigation was recommended.

Heritage submitted the Phase 1A and Phase 1B reports to the SHPO. SHPO responded on December 22, 2023, concurring that "no historic properties will be affected by the proposed solar facility and no additional archaeological investigation is warranted."

H. SCENIC VALUES

The Project is not expected to have any effect on scenic or recreational resources in the area of the Site.

I. PUBLIC HEALTH AND SAFETY

Lodestar is immensely concerned with safety. Overall, the Project will meet or exceed all health and safety requirements applicable for electric power generation. The Project would be designed to applicable industry, state and local codes and standards and will not pose a safety concern or create undue hazard to the public. The Project includes a proposed seven (7) foot high safety fence and locked gate (which is mandated by National Electric Code), which will limit

access to authorized or emergency personnel only. Each employee working on the Project Site will:

- Receive required general and Site-specific health and safety training;
- Comply with all health and safety controls as directed by local, state, and federal requirements;
- Understand and employ the Site health and safety plan;
- Know the location of local emergency care facilities, travel times, ingress and egress routes; and
- Immediately report all unsafe conditions to the construction manager.

J. NOISE

Noise generated by this Project will derive from the operation of (12) Solectria XGI 1500-166/166kW inverters, (1) Maddox 2250kVA transformer on the southern equipment pad and (6) Solectria XGI 1500-166/166kW inverters and (1) Maddox 1250kVA on the northern equipment pad. A single Solectria inverter has an acoustic noise output of 73dBA at 1 meter (3.28 ft) from the unit, a single 2250kVA Maddox transformer has an output of 62 dBA at 1 meter (3.28 ft), a single 1250kVA Maddox transformer has an output of 60 dBA at 1 meter (3.28 ft). As stated in Regulations of Connecticut State Agencies Sec. 22a-69-3.5, noise received within residential zones shall not exceed 51 dBA at night and 61 dBA during the daytime in order to minimize disturbance to abutting and adjacent property owners.

As calculated in **Exhibit 7, Appendix F**, the noise levels emitted from the inverters and transformers on the southern equipment pad will be 50.5 dBA at the closest abutting property line, located 154 ft away, across Lovers Lane and currently undeveloped. Noise levels from the southern equipment pad will be 38 dBA at the closest residence, 648 ft away from the origin of

noise emanation. The noise levels emitted from the inverters and transformers on the northern equipment pad will be 46.6 dBA at the closest abutting property line, located 158 ft away, across Lovers Lane and currently undeveloped. Noise levels from the northern equipment pad will be 37.3 dBA at the closest residence, 493 ft away from the origin of noise emanation. At night-time, the equipment will not be in use and will make no noise, or 0 dBA. Noise will be further reduced at farther property lines and buildings. Therefore, the proposed Project and its components comply with the applicable regulations.

During construction, heavy equipment will be required to access the Project Site and higher levels of noise are anticipated; however, Lodestar will conduct all activities during normal working hours.

K. FAA

Pursuant to 14 CFR § 77.9 regarding the FAA Notice of Proposed Construction or Alteration, the FAA must be notified of "any construction or alteration that exceeds an imaginary surface extending outward and upward at a slope of 100 to 1 for a horizontal distance of 20,000 feet from the nearest point of the nearest runway of the airport." 14 CFR § 77.9(b)(l) The Project Site information was submitted to the FAA for review and approval and copies of the FAA determinations of no hazard are attached hereto as **Exhibit 7, Appendix G.**

L. CARBON DEBT ANALYSIS

Lodestar has conducted an independent analysis of the Carbon Debt and Carbon Offsets of this Project, as seen in Exhibit 8. The proposed solar array Project area of disturbance, also referred to as "the Site," (including Panels, electrical equipment, access roads, and related ground clearing) is designed to cover approximately 17.19 acres of the 54.08-acre Property. All recyclable materials will be recycled and all non-recyclable materials will be disposed of in

accordance with applicable law. Approximately a 6.1-acre footprint of the proposed solar Project consists of unforested terrain. In total, the project calls for 11.8 acres of tree clearing for placement of the access road and shade mitigation in select areas within the vicinity of the arrays. There are demonstrable net benefits to the construction and operation of the solar Project which significantly offset the proposed 11.8 acres of clearing. The proposed solar Project is calculated to produce 5,299 MWh of energy during the first operational year. The net result of the project is a carbon offset of 3,691.9 MT CO2 in the first year. It will take less than twenty (20) days to recover the loss of carbon sequestration by the 11.8 acres of cleared trees with benefits accruing over twenty (20) years. Greenhouse gas equivalencies for this estimated offset include:

- 881 gasoline-powered passenger vehicles driven for one (1) year;
- 4,079,700 pounds of coal burned; and
- 483 homes' energy use for one year.

VI. PROJECT CONSTRUCTION AND MAINTENANCE

The construction of the Project will have an anticipated duration of approximately six to nine months, depending on the timing of applicable approvals, requiring the services of local electrical, civil and structural contractors. The initial phase of construction will include the creation of an access road, clearing and grubbing of the stormwater controls and, as required by DEEP, construction activities will not commence until full site stabilization has occurred. Based on the existing schedule, construction activities would then commence in Q2 2025 or upon approval. Next, steel foundations will be driven into the ground for the arrays. Steel racking components will be mounted on these foundations followed by the installation of photovoltaic modules. The electrical contractor will then install conductors from the photovoltaic modules to

the inverters and then to the transformers on the equipment pad. A single 15 kV class pad-mounted lockable fused disconnect and a separate 15 kV class pad mounted primary utility metering cabinet will be installed on the interconnection equipment pad area. Eversource will install two sets of three (3) utility poles at the interconnection and the customer will install one pad-mounted switchgear per interconnection at the interconnection access point to facilitate utility interconnection to the site. The electrical contractor will then install a medium voltage circuit underground to the two equipment pads on the west side of the arrays. Construction schedule will be based on a six (6) day work week Monday through Saturday between the hours of 7:00 AM and 5:00 PM but will be modified if required to comply with City of Torrington requirements. As noted above, the Petitioner will utilize erosion and sedimentation control consistent with the Connecticut Guidelines for Erosion and Sedimentation Control throughout construction of the Project.

Once construction is complete and the Project is operational, the Project Site will be monitored remotely twenty-four (24) hours a day, seven (7) days a week through a data acquisition system (DAS). The DAS is capable of detecting weather, production from all equipment at the Project Site, and safety concerns related to possible issues on site, grid outages, or faults. See **Exhibit 3.** An operations and maintenance team will perform detailed scheduled annual inspections of all equipment at the Project Site to make sure equipment is operating safely and reliably. In addition, the Petitioner's operations and maintenance team is on-call at all times in the event of unscheduled equipment maintenance or safety related concerns. Site vegetation is typically mowed three (3) times annually or as needed.

VII. CONCLUSION

This Project is precisely the type of project that Connecticut legislature, regulatory agencies, environmental groups, utilities, and ratepayers have been promoting to support our State's renewable energy goals and provide savings and tax benefits to municipal customers like the City Hartford and Torrington. The Project, a grid-side distributed resources Project with a capacity of less than 65 MW, is among the types of projects that the Council can approve by declaratory ruling. Accordingly, and for the reasons stated herein, because the proposed Project will meet state air and water quality standards and will not have a substantial adverse effect on the environment, Petitioner respectfully requests that the Council approve the location and construction of the proposed Project by declaratory ruling.

Respectfully submitted,

Petitioner
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