STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

PETITION NO. 1643 - 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 2.95-megawatt AC solar photovoltaic electric generating facility and associated equipment to be located at 77 Pompeo Road, Thompson, Connecticut, and associated electrical interconnection	**Petition No. 1643**
	January 9, 2025

Petitioner C-Tec Solar, LLC ("C-TEC" or "Petitioner") hereby submits the following responses to the Interrogatories that were directed to by the Connecticut Siting Council ("Council") on December 17, 2024.

Notice

1. Has C-TEC Solar LLC (C-TEC) received any comments since the petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.

Some of the comments received from the Town of Thompson ("Town") stated that Pompeo Road is classified as a scenic road. Comments also suggested the increasing of the setbacks from the road and applying an expanded buffer zone between the array, road frontage and direct abutters. For additional information, please see the Response to Interrogatory Number 3.

2. Referencing Petition p. 13 and Appendix M – Public Outreach, of the certified letters sent to abutting property owners, how many certified mail receipts were received to date? Which abutting property owners did not acknowledge receipt of the certified mailing? Describe any additional attempts to notify these property owners.

Notice letters were sent out to abutters on September 26, 2024. There are nine abutting properties. As per usual procedure, abutters mailing addresses are determined by using town GIS and tax assessor data. Valley Springs Sportsman's Club, Inc. owns three of the nine properties. Of the nine, six abutters responded. Three did not. For those three abutters for which no response was received – Scott and Dawn Reynolds, Kelly J. McGill Seega, and Stasia Menard, additional notices were sent on January 9, 2025.

3. Referencing Petition p. 13 and Appendix M – Public Outreach, when did C-TEC initiate discussions with the Town of Thompson (Town) regarding the proposed Project? Describe any concerns expressed by the Town and how C-TEC addressed these concerns?

C-TEC reached out to the Town earlier in 2024 to discuss setting up a tax agreement for the Project, however, the Town did not want to discuss any tax agreements until the Project received an approved general permit.

In addition, C-TEC is aware of the comments provided to the Siting Council from the Town of Thompson's Conservation Commission (dated October 24, 2024) and from the Board of Selectmen (dated December 17, 2024). Both letters relate primarily to the Town of Thompson designating Pompeo Road as a scenic road at a May 23, 2023 meeting of Thompson's Planning and Zoning Commission. Representatives of C-TEC were present at that meeting, but were not active participants.

While C-TEC understands the concerns expressed by the various Town agencies, C-TEC believes that these concerns can be addressed through additional screening and/or landscaping of the Project. C-TEC would welcome the opportunity to discuss such screening mechanisms with the Council during the scheduled evidentiary hearing on January 16, 2025.

Public Benefit

4. Referencing Petition p. 3 when was the project selected for the Non-residential Renewable Energy Solutions (NRES) Program?

The Project's award was finalized in November of 2023. The Project was originally an LREC/ZREC project, but that selection lapsed. C-TEC therefore re-submitted the project to the NRES Program. The Project was selected to be a part of the NRES Program in August of 2023. The Project's award number is ES NRES-00539.

5. Which entities would purchase the electricity, capacity and renewable energy certificates (RECs) from the facility?

Eversource will purchase the electricity, capacity and RECs from the facility.

6. If the facility operates beyond the terms of the NRES agreement, will C-TEC decommission the facility or seek other revenue mechanisms for the power produced by the facility?

If there is an economically viable revenue mechanism available after the 20-year NRES agreement expires, C-TEC will seek to operate the Project as long as possible (up to a total of approximately 35 years). If not, C-TEC will decommission the Project.

Project Development

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

The following permits are necessary and will be sought and held by C-TEC:

- Stormwater General Permit for Construction Activities from CT DEEP
- Building permit from the Town of Thompson
- Electrical permit from the Town of Thompson
- Eversource Interconnection Agreement

8. What is the estimated cost of the project?

Approximately $8,000,000 including Eversource's upgrade cost.

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?

This Project will not be undertaken by state departments, institutions or agencies and will not be funded in whole or in part by the State through any contract or grant.

10. 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?

Yes.

Proposed Site

11. Referencing Petition p. 7, identify the location of any alternate sites that were considered for solar development, including, but not limited to, other sites bid into the NRES Program, and the reasons they were rejected.

C-TEC goes through a screening process to weed out sites that are not appropriate for development of a solar project, due to interconnection issues, natural resource impacts, forestry impacts, agricultural concerns or other issues. Unfortunately, C-TEC does not keep a running track of all potential sites that are rejected during these initial screening activities. For this round of NRES bidding, C-TEC narrowed its selection down to three sites – the site that is the subject of this Petition, a site in South Windsor, and a site in North Canaan. The site in South Windsor was also selected for an NRES contract. The North Canaan site was rejected due to the fact that it had relatively minimal land that would be available to construct a solar project, and that there would be a high utility upgrade cost associated with the development of that site. As such, it no longer remained financially viable.

12. Pursuant to Connecticut General Statutes (CGS) § 16-50o, submit a copy of the unredacted lease for the proposed site. A Motion for Protective Order may be submitted for any confidential/proprietary information.

A redacted version of the lease is attached hereto as Exhibit I. An unredacted version of the lease shall be submitted pursuant to a Motion for Protective Order.

13. Referencing Petition p. 6, what is the current use of the southern access from Pompeo Road? What site traffic improvements to the access road are proposed for facility construction?

The southern access road east of Pompeo Road supports logging/timber harvesting on the property and was primarily used for equipment ingress/egress when these activities were performed by the landowner. Upgrades to the existing access path are anticipated to be limited to minor regrading and resurfacing modifications.

14. What is the distance of the southern access from Pompeo Road to the property line at 35 Pompeo Road? Could the southern access from Pompeo Road be reconfigured so that it is located further from the abutting property line to the south? If so, what options are feasible?

At its closest point, the surveyed existing edge of the access road is approximately 25 feet from the property line at 35 Pompeo Road. This existing access enters the site through a break in the otherwise-contiguous stone wall fronting the site along Pompeo Road and any change or widening of the access point would require stone wall removal. Secondly, moving this access would create the need for additional tree removal and grading to create the landscape for the new access road. Ultimately, it is Petitioner's belief that reuse of the existing access to the extent feasible would be most preferable in order to minimize site disturbances. However, Petitioner is willing abide by any preferences the Council may have with respect to this issue.

15. Does C-TEC intend to implement agricultural activities at the site? If so, provide details on the type of agricultural activities and who would be responsible for responding to concerns and/or complaints related to these agricultural activities? How would site contact information be provided?

C-TEC does not intend to implement agricultural activities at the site.

16. 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?

No. Nether the site nor the host parcel are part of the PA 490 Program. As such, the Project is not anticipated to affect the use classification of those areas.

17. 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?

No.

18. Provide the distance, direction and address of the nearest property line and nearest off-site residence from the solar field perimeter fence, transformer pads, stormwater basins and the proposed access drive.

The residential parcel of 35 Pompeo Road, to the southwest, shares a property line with the Project site. At its closest location, the Project site fence is approximately 70 feet from the northeast property corner of this parcel. The Project equipment pads are approximately 185 feet from this property line, the closest stormwater basin is approximately 30 feet away, and the access drive is approximately 25 feet away at its closest point. The approximate distance of the residence itself is 65 feet from the access path, 155 feet from the fence, 155 feet from a basin, and 200 feet from an equipment pad.

Proposed Facility and Associated Equipment

19. Referencing Petition p. 8, Figure 6 and Appendix A, what is the length and width of the existing wood road/southern access off Pompeo Road?

The length of the existing access path is approximately 250 feet, and on average it is approximately 13 feet wide.

20. Referencing Petition Appendix A Sheet C-1.0 Legend and General Notes are all the legend and abbreviations shown included in the site plans? Provide a site plan that shows the existing and proposed utility poles and the electrical interconnection route.

No, the legend and abbreviations depicted on Sheet C-1.0 are not representative of solely what is on or proposed at the Project site. This sheet has been revised to remove some of the extraneous legend and abbreviations. *See*, Exhibit A attached hereto for the revised Layout and Materials plan Sheet C-2.0 depicting the proposed interconnection route and layout.

21. Referencing Petition p. 8, it states Project inverters would be located throughout the array; however, Petition Figure 6 and Appendix A indicate the inverters would be installed in a single location. Clarify.

The inverters are anticipated to be free standing on posts right behind the racking, installed throughout the array. Refer to Exhibit A for the revised Layout and Materials plan Sheet C-2.0 depicting this edit. It should be noted, however, that final equipment has not been selected and so this may be subject to change.

22. Referencing Petition p. 8, would the inverters be located on the concrete pads, attached to the post-supported racking, or free standing on posts next to the concrete pad? Provide a site plan showing the locations of the inverters.

The inverters will be either attached to the post-supported racking or free standing on posts right behind the racking.

23. Referencing Petition Appendix A: sheet C-2.0, list the equipment that would be installed on the two proposed equipment pads.

This information can be found on Exhibit A, Layout and Materials Plan Sheet 2.0. It is anticipated that switchgear, transformers, and the data acquisition system will be located on the two proposed equipment pads.

24. Provide the voltage capacity of the proposed transformer.

The proposed transformer has a capacity of 2000kVA, 13.2/600v.

25. Referencing Petition Appendix A: sheet C-5.0, what is the maximum height from grade to the top edge of the solar panels?

Based upon the proposed module in 2-portrait racking configuration at a 20-degree tilt angle, it is anticipated that the difference between the bottom edge and top edge of the racking configuration would be approximately five (5) feet. When added to the two (2) foot minimum bottom edge clearance and accounting for anticipated north-facing topography, the maximum height from grade to the top edge of the solar panels would be approximately nine (9) feet. The cross section of fixed-tilt panel array detail has been revised to accurately match the proposed module and racking layout.

26. 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?

Yes, the wiring from the panels to the inverters will be installed on the racking. The overhang provided by both the racking and the modules would protect the wiring from potential damage. In areas where the overhang does not extend, C-TEC would utilize wire loom or electrical conduit to protect the wiring.

27. What is the expected useful life of the proposed solar facility?

The lease operation term is twenty (20) years with three (3) additional five (5) year extensions.

Energy Output

28. Referencing Petition p. 3, has C-TEC executed a Tariff Terms Agreement (TTA) with Eversource? Would the TTA include the transfer of capacity to Eversource?

Yes, there is an executed Tariff Terms Agreement which includes the transfer of capacity to Eversource.

29. Is the project being designed to accommodate a potential future battery storage system? If so, please indicate the anticipated size of the system, where it may be located on the site, and the impact it may have on the NRES TTA.

This Project is not intended to accommodate a potential future battery storage system at this time.

30. If one section of the solar array experiences electrical problems causing the section to shut down, could other sections of the system still operate and transmit power to the grid? By what mechanism are sections electrically isolated from each other?

Yes. This Project proposes to use string inverters as opposed to centralized inverters. If a single inverter needs to be shut down, the rest of the array can continue to function.

31. What is the projected capacity factor (expressed as a percentage) for the proposed project? Identify what electrical loss assumptions have been factored into the output of the facility, if any.

The estimated capacity factor is 20.6% with 7% electrical losses. These electrical losses include DC to AC conversion loss, clipping losses due to the limit on inverter capacity, near shading losses and transformer and wiring losses.

32. 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.

No, given the large interconnection upgrade fees, this Project will not be financially viable if the size of the Project is reduced.

Electrical Interconnection

33. Referencing Petition p. 9, how much of the electrical interconnection would be underground and how much would be overhead? Have there been any discussions with Eversource to use pad-mounted equipment rather than pole mounted equipment?

Approximately 200 feet of the interconnection is proposed above ground on poles, with approximately 100 feet underground from switchgear to first pole. Consultations with Eversource remain ongoing regarding interconnection layout and the possibility of reducing the pole quantity.

34. Provide the distance of the point of interconnection from the equipment pad.

The two proposed point of interconnection poles are approximately 140 to 150 feet away from the proposed switchgear pad.

35. Referencing Petition p. 9, provide the height of the existing utility pole on Pompeo Road.

The existing utility pole is estimated to be between 30 to 40 feet above grade.

36. Would additional utility poles be required for the electrical interconnection? If so, how many would be C-TEC-owned, and how many would be Eversource-owned? What is the height above grade of the additional utility poles and the distance between them?

There will be approximately four Eversource owned poles and four C-TEC owned poles. The standard height of these poles is between 30 and 40 feet. The distance between these poles has yet to be finalized because discussions with Eversource remain ongoing.

37. What equipment would be located on the Eversource and C-TEC poles?

There will be a recloser and primary metering on the Eversource poles. A recloser monitors the line/load power and will shut the site down if there are any irregularities. Primary metering is on the MV side and monitors usage. On the C-TEC poles, there will be a Gang Operated Air Break Switch ("GOAB") and fused cutouts. A GOAB is a manual disconnect and fused cut outs are a safety mechanism to protect electrical equipment from current surges/overloads.

38. Referencing Petition p. 9, 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? Would any off-site upgrades to the existing electric distribution system be required (e.g. distribution line upgrades)?

The existing overhead distribution line is single phase and will be upgraded to three phase as part of this Project. Once complete, the three-phase extension will be approximately 1.25 miles. It is anticipated that the Project will also require a voltage regulator upgrade at the South Woodstock 26E Substation.

Public Health and Safety

39. Would the project comply with the current National Electrical Code, National Electrical Safety Code, Connecticut State Building Code, Connecticut State Fire Prevention Code, and National Fire Protection Association codes and standards, as applicable?

Yes, the Project will comply with all applicable codes and standards.

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

According to the Council's revised EMF Best Management Practices dated December 2022, the Council reported findings that there are no state or federal exposure standards for 60-Hz MF based on demonstrated health effects. Nor are there any such standards world-wide. The Council recognized that a 2010 guideline established 2,000 mG as an acceptable exposure level to EMF. The Council requires certain EMF Best Management Practices ("BMPs") for electrical transmission lines and to modifications of existing lines that require a Certificate but does not require adherence to the same BMPs for electric generation facilities such as this Project.

Petitioner also notes that in 2015, the Massachusetts Department of Energy Resources, Department of Environmental Protection, and Clean Energy Center released a solar guide that states that PV arrays generate EMF in the same extremely low frequency range as electrical appliances and wiring found in most homes and buildings and that the measurements at three commercial PV arrays in MA gave off less than 0.5 mG at the sites' boundaries and typically PV arrays give off less than 1.0 mG within three inches of the panels, whereas a vacuum cleaner three feet away from a motor is approximately 2.0 mG. As such, Petitioner is not aware of any BMPs for EMF at solar facilities.

41. 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?

C-TEC will provide training to first responders as well as provide a lock box to emergency personnel for site access. The lock box will be located outside of the fenced area at the gate.

42. Provide an Emergency Response Plan for the proposed facility.

A draft Emergency Response Plan is included herewith as Exhibit B. It is anticipated that the final Emergency Response Plan will need to be coordinated with the Town of Thompson.

43. 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?

In the event of an electrical fire or brush fire that threatens electrical equipment, the proper response to mitigate further risk is to spray water around the fire area to reduce or prevent the spreading of fire. Additionally, all electrical equipment would be shutdown via a main switch. If necessary, the facility can also be de-energized remotely. If the Project main switch is not accessible, the electricity can also be turned off on the utility side at the point of interconnection. This information will be included during the training of emergency responders.

44. 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?

There is no known fire hydrant within 1000 feet of the site in either direction or a water source, therefore, it is anticipated that a water tank truck would be required to be dispatched to the site in the event of a fire emergency. The Town of Thompson is serviced by five (5) volunteer fire Departments. https://www.thompsonct.org/other-services/pages/fire-departments. Between those five fire departments, there are at least three tankers available in the event of a fire. *See* https://wtvfd.wordpress.com/fire-apparatus/ and https://www.qvfd83.com/apparatus for information regarding available equipment.

45. Referencing Petition p. 8, what type of insulating oil is used within the transformer? Is it biodegradable? Does the transformer have containment systems in the event of an insulating oil leak? Would the transformer have low oil alarms?

The final selection of a transformer for this Project has not been made as of this time, however, C-TEC anticipates that it will select a transformer that uses insulating oil that is FR3 and biodegradable. C-TEC does not anticipate utilizing a separate containment system and typically does not employ a low oil alarm on its transformers as a lack of oil within the transformer will result in system failures. These system failures will trigger alerts through C-TEC's data acquisition system, and data acquisition systems will inform C-TEC of difficulties with the equipment without the need for an additional alarm.

46. 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?

No, it is not anticipated that vibrations from installation would affect nearby private wells in function or water quality, including sedimentation. In addition, the foundation systems proposed for the facility are relatively shallow ground screws of approximately six (6) foot length.

47. What is the dominant source of noise from the solar facility? Would operation of the proposed facility meet the applicable state noise standards at the nearest property boundary?

The dominant source of noise on the site would be the site transformer and inverters, which will not operate at night. The results of the provided noise study demonstrate that operation of the facility would meet applicable State noise standards with regard to the property lines closest to the equipment locations.

48. Provide a cumulative noise analysis for the proposed facility operation that includes all noise-producing equipment.

A noise study taking into account all noise-generating equipment and the topography of the site has been prepared and is included herewith as Exhibit C.

49. Referencing Petition p. 15, C-TEC 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 C-TEC accounted for the combined effects of twenty-two 125 kW inverters, two 100 kW inverters and one transformer in its noise projections? Explain.

As indicated in the noise study referenced in the Response to Interrogatory No. 48, based on the dissipation of sound from each inverter and the layout of the inverter locations being dispersed throughout the array, the effects of the electrical equipment will not multiply to any significant extent in any specific area of the site. The largest source of noise generation of any single or combined number of electrical components will not exceed State guidance standards.

50. Would cumulative noise from equipment on both equipment pad areas materially affect projected noise levels at the nearest abutting property line? Explain.

No. Please see the noise study referred to in the Response to Interrogatory No. 48.

51. What is the distance from the equipment pad to the property line at 35 Pompeo Road? What would be the noise level from operation of the facility at the 35 Pompeo Road property line?

The nearest proposed equipment pad to 35 Pompeo Road is approximately 140 feet away to the nearest mutual property line. As is displayed in the findings of the Noise Study referred to in the Response to Interrogatory No. 48, the anticipated maximum noise level from operation of the facility to the nearest 35 Pompeo Road property line is 35 dBA.

52. Does C-TEC intend to move the inverters and equipment pads farther from nearby residences? Provide a site plan showing the revised location of the equipment pad and inverters.

The switchgear is approximately 140 feet from the nearest property line and the transformer is approximately 170 feet from the nearest property line. The inverters have been added to the site plans and are shown throughout the solar array (24 in total). The nearest inverter is approximately

230 feet from a residential property line. Please refer to Exhibit A, Sheet C-2.0, for additional information.

53. Identify the distance/direction and name of the nearest federally-obligated airport from the proposed site. Is a glare analysis required to comply with Federal Aviation Administration (FAA) policy?

The Toutant Airport in Putnam, CT is anticipated to be the nearest federally-obligated airport from the proposed site, and is approximately 7 miles southwest from the proposed site. A glare analysis is not traditionally required for FAA consultations at such distances.

54. Would notice to the FAA be necessary for the temporary use of a crane during construction?

The FAA requires notification on alterations, permanent or temporary, taller than 200ft above ground level. C-TEC does not propose to use a crane in the construction of this Project.

55. Provide a construction fuel spill prevention and materials storage plan.

A draft Spill Prevention, Control, and Countermeasure ("SPCC") Plan has been prepared and is included herewith as Exhibit D. It is anticipated that the final SPCC Plan would require consultation with the final project construction team, once that team is selected and retained.

Environmental Effects and Mitigation Measures

56. Is tree clearing required for the proposed project? If so, please provide the following:

    a. Acreage of tree clearing only; and

The project is largely proposed to be sited on a portion of the host parcel that has had recent timber harvests performed by the landowner. Notwithstanding that fact, the approximate acreage of forested/harvested area proposed to be cleared for the project is approximately 19 acres.

    b. Acreage of tree clearing and grubbing;

The project is largely proposed to be sited on a portion of the host parcel that has had recent timber harvests performed by the landowner. Notwithstanding that fact, the approximate acreage requiring stumps to be grubbed is approximately 16 acres.

57. Would the proposed project be consistent with the 2015 U.S. Army Corps of Engineers Vernal Pool Best Management Practices?

Yes, the project will be consistent with these practices. Solar development is unique in the sense that post-construction conditions are not restrictive for the migration of vernal pool species given the minimal ground interference of the racking. In addition to the lack of restriction of animal migration, the overall grading for the stormwater basins impacts the 750-foot critical terrestrial habitat (CTH) by less than 25%, as recommended by the ACOE BMPs. The 100-foot non-disturbance buffer from wetlands and vernal pools is part of the project's design, and there are woodland and wetland areas within the CTH will remain accessible to migratory species.

58. What is the distance of each of the identified vernal pools to the nearest stormwater basin? Is it possible that the basin(s) would be subject to groundwater pooling in the spring and act as a decoy pool for vernal pool species? If yes, can modifications be made to reduce the potential for the basin(s) to act as a decoy pool?

The nearest proposed stormwater basin to Vernal Pool 1 is approximately 300 feet and the nearest proposed stormwater basin to Vernal Pool 2 is approximately 175 feet. To address the recent stormwater geotechnical findings (included herewith as Exhibit E) and to help reduce potential of decoy pools, the proposed stormwater basins have been revised to incorporate sand filters in lieu of being traditional infiltration basins. This will help ensure that the basins drain dry between rainfall events and do not have the capacity to hold standing water through the lifespan of the Project.

59. Provide a wetland and vernal pool protection plan for the proposed project.

A wetland and vernal pool protection plan has been prepared for the proposed Project and is included herewith as Exhibit F.

60. Referencing Petition p. 12, what type of landscaping and/or visual screening is proposed and in what locations?

Currently there is no additional landscaping/visual screening proposed, since as currently designed, the Project will be screened when trees are in leaf-on conditions. If the Council so desires, Petitioner would be amenable to adding some additional plantings to enhance visual screening.

61. Referencing Petition Appendix I, describe the seasonal and year-round visibility of the proposed facility, including the proposed utility poles, from Pompeo Road and from properties that are not owned by the lessor of the host parcel.

The majority of the site is already screened from the roadway by existing trees. During 3 of the 4 seasons of the year when these trees are in leaf-on conditions, the site is not anticipated to be visible from the roadway. Please also see the Response to Interrogatory Response No. 60.

62. Are there any Town or State-designated scenic roads within a half-mile of the site? If yes, describe the visibility of the facility from these roads.

Pompeo Road is a known Town-designated scenic road. The existing trees and vegetation that exist between the roadway and the proposed limit of disturbance of the Project will be preserved to provide as much screening as possible.

63. Referencing Petition p. 16, where is the nearest publicly accessible recreational area from the proposed site? Describe the visibility of the proposed project from this recreational area.

The nearest known publicly accessible recreational area to the site is the Duhamel fishing pond, which is approximately three quarters of a mile from the Project site and is separated from the site by several streets, neighborhoods, forestry, and topography. It is not anticipated that the Project would be visible from this resource, even in off-leaf conditions.

64. Referencing Petition p. 6, 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?

The final length and depths of the poles will be determined by the racking manufacturer, however, it is anticipated that the foundation systems proposed for the facility will be relatively-shallow ground screws, that are approximately six (6) foot length, and made of galvanized steel, which will help alleviate corrosion of the material in the ground.

65. Referencing Petition, P. 17, what is the status of the Phase 1B Survey?

The shovel pits required for the Phase 1B investigation are complete and a report by Heritage Consultants dated December 2024 contends that no historic resources will be affected by the proposed Project. This report was sent to SHPO for their review and concurrence, and SHPO provided a letter to the team dated December 30, 2024 concurring that no historic properties would

be affected by the Project. A copy of the Phase 1B report and the SHPO concurrence letter are included herewith as Exhibit G.

66. 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? How would C-TEC protect the wells from construction impacts?

A review of the Connecticut Department of Public Health Water Supply Map viewer suggests that the host parcel itself and surrounding parcels may either be served by private wells or by public water; however, the existence and/or location of any wells has not been confirmed. It is not anticipated that vibrations from installation would affect nearby private wells in function or water quality, including sedimentation.

Facility Construction

67. How would traffic be managed during construction?

The majority of the trucks will be smaller light-duty trucks that should not impact traffic. The Project will use best efforts to spread truck traffic out during the entirety of the available construction hours. Heavier trucks will be required during site clearing activities and for the delivery of materials to the site. Due to the irregular schedule of traffic and trucking that may be involved during construction of the Project, it is anticipated that each trucking operation will provide as-needed flagging and traffic direction/signage during usage of the roadway.

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

No blasting is required to develop the site or construct stormwater features. It is anticipated that a rock drill would be used to pre-drill areas of the site if needed for the foundation posts.

69. Has a comprehensive geotechnical study been completed for the site to determine if conditions support the overall Project design? If so, summarize the results. If not, has C-TEC anticipated and designed the Project with assumed subsurface conditions? What are these assumed conditions?

The primary geotechnical consideration at this site is the presence of shallow bedrock, dense Glacial Till, and cobbles and boulders located throughout the site. Fourteen of the sixteen test pits encountered refusal on bedrock or boulders. Refusal in the test pits ranged from 1-foot to 8.5-feet below existing grade which will affect pile installation and embedment depth. Pile foundations are

not considered feasible without pre-drilling. Please also see the geotechnical report referenced in the Response to Interrogatory No. 58.

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

Slopes in the Project area range from 2% to 15%. No grading outside of the stormwater basins is proposed, and the Project has been designed such that slopes exceeding 15% have been avoided.

71. Referencing Petition Appendix A Sheets C-3.0 and Existing Conditions, there is an area depicted in the northwest corner of the site where there is ground water present that is proposed to be occupied by solar panels. Explain.

This area is an area that exhibited a small pocket of surface water at the time of land survey fieldwork that is not always present. This area is not deep enough to affect the performance of the Project and thus no modifications are proposed here. Furthermore, the area was included as a study area for the 2021 wetlands delineation performed by All Points Technology and was not found to be a wetland. As such, wetland protections measures were not deemed to be necessary for this area.

72. Referencing Petition Appendix A Sheets 2.0, 3.0 and 4.0, there are two areas unoccupied by solar panels in the northwest and southeast corners of the proposed site with notes, "Petitioner reserves the right to crush and reuse material excavated from rock ledge for on-site purposes."

    a. Would rock processing occur on-site during construction? If so, what are the details of this activity, including, but not limited to, duration, location and required machinery?

    b. Would rock processing occur on-site during construction? If so, what are the details of this activity, including, but not limited to, duration, location and required machinery?

    c. What is the estimated cost of removing this material from the site compared to processing it on-site?

    d. Where does C-TEC anticipate reusing the excavated material?

The following response addresses questions 72(a)-(d): In the event that Petitioner elects to process the crushed ledge material, this activity would occur on site with the appropriate equipment in the center of the Project site. The duration of the rock drilling may take place at any point during the construction of the Project, though it likely would not take place every day. Rock drilling would adhere to the Town's noise ordinances. The bulk of the excavation and processing is anticipated

to take place during the earlier phases of the Project, when site clearing is taking place, and stormwater measures are being constructed. This would include hammering of the ledge with an excavator-mounted pneumatic hammer, and collection and transport of this material on site with a front loader. As the intent of the reuse of material would be for the riprap spillways located at the stormwater basins and/or construction of the proposed access road, this would be a relatively low quantity of material, and the anticipated dust creation of this activity would be minimal. It is anticipated that reuse of the onsite rock would represent significant cost savings because hauling offsite as well as purchasing new material would be avoided.

73. Estimate the amounts of cut and fill in cubic yards to develop the facility.

The overall required cut is approximately 3,810 cubic yards and the overall required fill is 1,625 cubic yards, yielding a net cut of 2,185 cubic yards.

74. Given the existence of rock ledge at the site, how would C-TEC establish suitable erosion and sedimentation controls before any ground disturbance activities occur?

The Project has largely avoided the aboveground ledge outcroppings as can be seen from the site layout plans. As a result, it is not anticipated that the shallow ledge at the site will impact the installation of any proposed erosion control measures including silt fence, anti-tracking pads, or sediment traps.

75. Would all perimeter controls such as swales and basins be installed and stabilized before work commences on the panel installation?

Yes, all erosion control measures will be installed and stabilized before panel installation. Furthermore, it is anticipated that both an independent inspector and a representative of the Conservation District will be on site performing regular inspections as a condition of the Project's CT DEEP Stormwater General Permit - a focus of which is review for allowances to move from one construction phase to the next.

76. Has C-TEC submitted an application for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities from the Department of Energy and Environmental Protection (DEEP)?

No. Petitioner plans on applying for this permit in 2025.

77. Has C-TEC consulted with DEEP Dam Safety program regarding permitting requirements, if any, for the proposed stormwater basins?

The Project team met with the CT DEEP Concierge team on September 25, 2024. The Project was discussed in full and the Dam Safety Division elected not to join the call. Accordingly, along with the fact that the Project does not propose any stormwater basin impounding over three acre-feet of stormwater, it is anticipated that further consultation with Dam Safety Division is not necessary for the Project. A copy of the CT DEEP Concierge meeting summary email is included herewith as Exhibit H.

Facility Maintenance/Decommissioning

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

The inverters are expected to last for the duration of the Project's life. The inverter manufacturer provides warranties such that individual inverters can be replaced if necessary.

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

Replacement modules will not be stored on site.

80. Would the installed solar panels require regular cleaning or other, similar, maintenance? If so, describe cleaning procedures including substances used.

It is not anticipated that the solar panels will require regular cleaning or maintenance. The tilt of the panels and regular rainfall will help to keep the panels free of debris.

81. 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?

The final panels have not yet been determined at this time. However, C-TEC commits that it will not install solar panels that are classified as hazardous waste through TCLP testing.

82. What specific ground cover will be used for soil restoration once decommissioning is complete?

Once decommissioning is complete, C-TEC will stabilize the site with a New England pollinator seed mix.