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Via Hand Delivery

February 7, 2025

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: PETITION NO. 1645 - VCP Mansfield LF, LLC d/b/a Verogy – Petition for Declaratory Ruling for the Construction, Operation, and Maintenance of a 1.8 MW AC Ground-Mounted Solar Photovoltaic Electric Generating Facility at Mansfield Landfill, 221 Warrenville Road (CT Rt. 89), Mansfield, Connecticut

Response to Council Interrogatories Dated January 27, 2025

Dear Attorney Bachman:

Enclosed is an original and fifteen (15) copies of our written responses and related supporting materials to address the Council's Interrogatories dated January 27, 2024 for the above-referenced Petition for Declaratory Ruling for the VCP Mansfield LF, LLC and VCP, LLC d/b/a Verogy solar facility at the closed Town of Mansfield landfill, located at 221 Warrenville Road (CT Rt. 89) in Mansfield, Connecticut. An electronic copy of this is also being provided via email. If you have any questions concerning any of the materials provided, please contact me.

Thank you in advance for your assistance and cooperation.

Sincerely,

A handwritten signature in black ink that reads "James Cerkanowicz". The signature is written in a cursive, flowing style.

James Cerkanowicz, PE
Manager of Permitting

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
A PETITION OF VCP MANSFIELD LF, LLC AND	:	PETITION NO. 1645
VEROGY HOLDINGS, LLC d/b/a VEROGY, LLC	:	
FOR A DECLARATORY RULING FOR THE	:	
PROPOSED CONSTRUCTION, MAINTENANCE	:	
AND OPERATION OF A 1.8 MW AC SOLAR	:	
PHOTOVOLTAIC ELECTRIC GENERATING	:	
FACILITY AT 221 WARRENVILLE ROAD,	:	
MANSFIELD, CONNECTICUT	:	FEBRUARY 7, 2025

**RESPONSES OF VCP MANSFIELD LF, LLC
AND VEROGY HOLDINGS, LLC D/B/A VEROGY
TO CONNECTICUT SITING COUNCIL INTERROGATORIES**

On January 27, 2025, the Connecticut Siting Council (“Council”) issued Interrogatories to VCP Mansfield LF, LLC (“VCP”) and Verogy Holdings d/b/a Verogy, LLC (“Verogy”, together with VCP “Petitioner”), relating to Petition No. 1645. Below are the Petitioner’s responses.

Notice

Question No. 1

Referencing Petition p. 14 and Exhibit F, has VCP Mansfield LF, LLC (VCP) received any comments since the petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.

Response

VCP has not received any comments since the petition was submitted.

Public Benefit

Question No. 2

Referencing Petition pp. 3 and 7, when was the project selected for the NRES Program?

Response

VCP was notified on June 20, 2022, of this project's selection for the NRES Program.

Question No. 3

Referencing Petition p. 7, would Eversource also purchase the capacity and renewable energy certificates (RECs) from the project in addition to the energy?

Response

Per the NRES Tariff Eversource will buy all Energy, RECs, and Environmental Attributes produced by the project.

Question No. 4

If the facility operates beyond the terms of the NRES agreement, will VCP decommission the facility or seek other revenue mechanisms for the power produced by the facility?

Response

VCP may seek additional revenue mechanisms at the conclusion of the NRES agreement to continue operation of the facility if such mechanisms are available and if the Town of Mansfield is agreeable to a lease extension. If this cannot be accomplished, VCP will decommission the facility.

Project Development

Question No. 5

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 VCP Facility. VCP 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. Connecticut Department of Energy and Environmental Protection, Authorization for the Disruption and Post Closure Use of a Closed Solid Waste Disposal Area.
- c. Town of Mansfield, Building Permit.
- d. Town of Mansfield, Electrical Permit.

Question No. 6

What is the estimated cost of the project? How are costs recovered?

Response

The estimated cost of the VCP project is between \$6M to \$7M. The project receives revenue through its NRES contract.

Question No. 7

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. 8

If VCP transfers the facility to another entity, would VCP 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 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.

Question No. 9

Referencing Petition p. 3, it states construction efforts would commence in spring 2024. Petition p. 12 states construction efforts would commence in spring 2025? Explain.

Response

Petition page 3 should have indicated spring 2025, not spring 2024.

Proposed Site

Question No. 10

Are there any provisions in the lease agreement with the Town related to decommissioning or site restoration at the end of the project's useful life? If so, please describe and/or provide any such provisions.

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. 11

What is the area of the limit of disturbance of the proposed project?

Response

The limit of disturbance of the project is approximately 8.8 acres.

Question No. 12

What entity manages the landfill?

Response

The Town of Mansfield Department of Public Works manages the landfill.

Question No. 13

What is the distance and direction from the perimeter fence of the solar facility to the nearest residence and what is the address of the residence?

Response

The nearest residence to the perimeter fence of the solar facility, 31 Wormwood Hill Road, is located approximately 1030 feet east of the southeastern fence corner.

Question No. 14

Referencing Petition p. 29, what is the address of the residence that is 1,100 feet from the nearest equipment pad?

Response

27 Wormwood Hill Road is the address of the residence located approximately 1100 feet from the equipment pad.

Proposed Facility and Associated Equipment

Question No. 15

What is the length (in feet) of the existing access route? Are any upgrades, such as gravel,

required to make it suitable for the construction and maintenance of this proposed solar facility?

Response

The existing access route from Warrenton Road to the Facility is approximately 1,730 feet in length. It is not anticipated that upgrades will be necessary to the existing paved access road, as it is currently utilized by heavy equipment and vehicles for the existing transfer station.

Question No. 16

Provide a map showing the location of the inverters, switchgear and transformers. Would the inverters be installed on concrete pads or posts? What are the approximate dimensions of the transformer and switchgear?

Response

Sheet C101 of Appendix B (Project Plans) indicates the equipment pad area where the inverters, switchgear, and transformers will be located. The inverters will be mounted on posts that will be anchored into a concrete ballast block and placed upon a prepared gravel surface. The approximate dimensions of the transformer, pending final engineering and exact model selection, is approximately 5'-8" wide, 7'-2" deep, 6'-3" high. Final switchgear engineering and exact model selection are still pending currently. However, based on the recent construction of similar systems, the dimensions of the switchgear are anticipated to be approximately 80" tall by 42" wide by 24" deep.

Question No. 17

Provide the dimensions of the ballasts supporting the solar panels.

Response

Preliminary engineering of the ballasts supporting solar panels for this project indicates dimensions will be approximately 2' wide by 7'-3" long by 1'-5" deep.

Question No. 18

Referencing Petition Appendix H, the SHPO letter refers to a 2.3 MW facility. Was the size of the proposed facility reduced? Explain.

Response

The size of the proposed facility was not reduced. It appears that the SHPO letter refers to the DC size of the system, which is 2.3 MW.

Energy Output

Question No. 19

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

Response

No battery storage system is currently contemplated for the 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. 20

Have electrical loss assumptions 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 of the facility and the output at the point of interconnection is calculated as approximately 1.753 MW AC.

Electrical Interconnection

Question No. 21

Provide the line voltage of the proposed electrical interconnection.

Response

The line voltage of the proposed electrical interconnection is 23 kV.

Question No. 22

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

Response

The distance is approximately 1700 feet from the interconnection to the equipment pad.

Question No. 23

Provide the total length of cable tray to be installed.

Response

The total length of cable tray is currently estimated to be 1000 feet.

Question No. 24

Referencing Petition p. 8, the project would require the installation of five new utility poles. Identify the location of the five utility poles on a map.

Response

Sheet C101 of Appendix B (Project Plans) indicates the location of the five new utility poles by virtue of the callout that indicates “Limits of Overhead Line Extension/Point of Interconnection”. The proposed poles will be installed thirty feet apart along these limits.

Question No. 25

Of the five poles, how many would be VCP-owned and how many would be Eversource-owned and what equipment would be located on the respective poles?

Response

Three poles will be VCP owned, and two poles will be Eversource owned. The first

Eversource pole will contain a recloser and the second Eversource pole will contain a primary meter. The first VCP pole will contain a disconnect switch; the second VCP pole will contain a customer meter; and the third VCP pole will contain a customer recloser and riser to transition from overhead to underground service.

Question No. 26

What equipment would be located on the Eversource and VCP poles?

Response

Please refer to the response to question number 25 above.

Question No. 27

Provide the height above grade of the proposed utility poles and their distance apart.

Response

The poles will be 40-45 feet above grade and will be spaced 30 feet apart.

Question No. 28

Would any of the power produced be used on-site, or would it all be fed into the local distribution system? If any of the power would be used on-site estimate the total on-site load in kilowatts.

Response

All the power produced on-site will be fed into the local distribution system.

Question No. 29

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. 30

Have there been any discussions with Eversource to use pad-mounted equipment rather than pole-mounted equipment? Provide cost estimates for both an overhead and underground interconnection.

Response

The Petitioner has not had such a discussion with Eversource about this project but has had similar discussions with Eversource 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 project interconnection plan represents the minimum number of poles required by Eversource. Based on our experience, we estimate Eversource's cost for the new service connection will be approximately \$300,000. A breakdown specifying the new service costs was not provided as part of the Interconnection Agreement as the estimate included other required system upgrades. VCP 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), VCP 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. 31

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

Response

Yes.

Question No. 32

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 VCP 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).

Question No. 33

Would notice to the FAA be necessary for the temporary use of a crane during construction? If a crane is used, what would be the crane height needed to install site equipment?

Response

Per Appendix I of the Petition, FAA Determination, an estimated crane height of forty feet was input into the FAA's Notice Criteria Tool and it was determined that the Notice Criteria was not exceeded.

Question No. 34

Referencing Petition p. 16, where are the manual facility shut-off switches that can be operated by emergency personnel located?

Response

Emergency personnel can operate shut-off switches located at either the equipment pad area adjacent to the array or at the utility poles at the east end of the site access road where it intersects Warrenville Road and the project interconnects to the Eversource grid.

Question No. 35

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. 36

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 VCP project site. The Petitioner is not familiar with and therefore cannot comment on alternative water sources that might be available to the Mansfield Fire Department or how water would be brought to the site.

Question No. 37

Provide an Emergency Response Plan for the proposed facility.

Response

Attached is a revised Operation, Maintenance, & Emergency Response Plan that addresses the Emergency Response for the proposed Facility.

Question No. 38

What type of insulating oil is used within the transformer(s)? Is it biodegradable? Do the transformer(s) have a containment system in the event of an insulating oil leak? Would the transformer(s) have a low oil alarm?

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. VCP can monitor these contacts through the facility monitoring platform. VCP will add remote monitoring of leak detection to the Project.

Environmental Effects and Mitigation Measures

Question No. 39

What is the distance to Lions Memorial Park from the perimeter fence?

Response

The distance to Lions Memorial Park from the perimeter fence is approximately 850 feet.

Question No. 40

Referencing revised Appendix G, did DEEP reply to the State-listed Species Protection Plan dated October 22, 2024 and does Davison Environmental hold a collector's permit as required by the DEEP NDDDB letter dated September 26, 2024 in Petition Appendix G?

Response

The Protection Plan follows the requirements provided in the DEEP NDDDB letter. DEEP does not require submission of such plans for review and approval after they make their initial determination. Yes, Davison Environmental does hold the required collector's permit that is referenced in the DEEP NDDDB letter dated September 26, 2024.

Public Health and Safety

Question No. 41

41. Has VCP applied to DEEP for a stormwater permit? If so, what is the status of such permit?

Response

A DEEP stormwater permit was applied for on November 13, 2024 and an approval was granted on January 13, 2025. A copy of the approval letter is included here.

Question No. 42

What effect would runoff from the drip edge of each row of solar panels have on the landfill cap or site drainage patterns? Would channelization below the drip edge be expected? If not, why not?

Response

The rows of solar panels are not considered “closed systems,” because there are gaps between each module (both north/south and east/west). As such, the drip edge of each solar panel will not have an impact on the Site’s landfill cap or site drainage patterns, as stormwater will flow off the panels at multiple locations as the panels follow the contours of the existing land. For the same reason, after construction is complete and the Site is fully stabilized, channelization along the drip edge is not expected.

Question No. 43

What is the anticipated sequence of construction? During what time of year would each sequence ideally occur? Does this account for possible seasonal construction restrictions due to the presence of protected species?

Response

An approximate anticipated sequence of construction would be as follows:

1. Install erosion control measures
2. Install perimeter fence
3. Install ballast blocks
4. Install utility poles and related equipment
5. Install racking
6. Install panels
7. Install above grade and below grade electrical wiring
8. Install equipment pad area
9. Energize system
9. Stabilize disrupted areas

10. Remove erosion control measures

The above listed activities can be conducted at any time of year and ideally occur under the most advantageous weather conditions. There are protective measures for the species that are recommended for construction during the period between April 1st and November 1st. However, there are no seasonal construction restrictions due to the presence of protected species.

Question No. 44

Would ballasts be cast on-site? If yes, where would this activity occur?

Response

Ballasts will be pre-cast off-site by a manufacturer and delivered to the site.

Question No. 45

What type of construction vehicles would be expected to enter the site during construction and where would they park?

Response

During construction, heavier vehicles such as flat-bed tractor trailers will be confined to existing paved and gravel areas, where materials and other construction equipment will also be off-loaded. Passenger vehicles and pickup trucks utilized by construction workers will also typically be confined to these same existing areas, when possible. For construction within the capped landfill area, construction equipment, such as loaders, that are designed to minimize pressure and any possible disruption to the landfill cap will be utilized. Care will be taken to not leave vehicles parked within the landfill cap area that are not in use. The vehicles will park in an area designated by the Town of Mansfield within their adjacent gate controlled on-site transfer station facilities.

Facility Maintenance/Decommissioning

Question No. 46

Would the petitioner store any replacement modules on-site in the event solar panels are damaged or are not functioning properly? If so, where? How would damaged panels be detected?

Response

No replacement modules will be stored on-site. Damaged panels can be detected through the use of thermal imaging equipment that can be mounted on a drone.

Question No. 47

Referencing Petition Appendix D, the Operations and Maintenance Plan references the Town of North Franklin. Submit a revised Operations and Maintenance Plan referencing the Town of Mansfield

Response

Attached is a revised Operations, Maintenance, and Emergency Response Plan that removed any incorrect references to the Town of North Franklin and now correctly references the Town of Mansfield.