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FILED BY EMAIL AND DELIVERY

siting.council@ct.gov

Melanie Bachman
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: PETITION NO. 1665–TRITEC Energy Development, LLC (TRITEC Americas, LLC) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.0 megawatt solar photovoltaic electric generating facility and associated equipment to be located at 74 Bokum Road, Old Saybrook, Connecticut, and associated electrical interconnection.
Petitioner's Responses to Interrogatories.

Dear Executive Director Bachman:

Through its undersigned counsel, TRITEC Energy Development LLC, a subsidiary of TRITEC Americas, LLC, respectfully submits via email the enclosed responses with attachments to the Council's Interrogatories dated August 22, 2025. The original and 15 copies will be delivered to the Office of the Siting Council.

Very Truly Yours,

A handwritten signature in blue ink, appearing to be 'B. Antaki', with a long horizontal flourish extending to the right.

Bernadette Antaki

Enclosures

cc: Service List dated May 2, 2025

Petition No. 1665
TRITEC Energy Development, LLC (TRITEC Americas, LLC)
74 Bokum Road, Old Saybrook

Interrogatories
August 22, 2025

Notice

1. Has TRITEC Americas, LLC (TRITEC) received any comments since the petition was submitted to the Council? If yes, summarize the comments and state how these comments were addressed.

RESPONSE:

No.

2. Describe outreach efforts to each member of the State legislature whose district encompasses the proposed facility site.

RESPONSE:

TRITEC mailed notice letters prior to submitting the petition generally describing the proposed solar project, indicating its intent to submit a petition to the Siting Council, and the ability to obtain the petition once filed with the Siting Council.

Project Development

3. 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.

4. What is the estimated cost of the project?

RESPONSE:

The actual cost of the project will not be known until the project is constructed and operating. The cost of project equipment is highly volatile and uncertain in the current economic and political environment, however, the current rule of thumb for project cost is approximately \$1.5 million per megawatt of installed capacity plus the cost for the interconnection upgrades, which average about \$500,000 per megawatt of installed capacity.

5. Referencing Petition p. 8, when was the project selected for the Non-Residential Renewable Energy Solutions (NRES) Program? What is the contractual in-service date?

RESPONSE:

The project was selected in the February 2024 NRES solicitation. The non-binding estimated in-service date is December 31, 2025.

6. If the facility operates beyond the terms of the NRES Agreement, will TRITEC decommission the facility or seek other revenue mechanisms for the power produced by the facility?

RESPONSE:

TRITEC would first seek other revenue mechanisms for the power produced by the facility, and if none are available or financially feasible, TRITEC would decommission the facility.

7. If TRITEC transfers the facility to another entity, would TRITEC 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.

Proposed Site

8. Submit a map clearly depicting the boundaries of the solar facility site and the boundaries of the host parcel. Under Regulations of Connecticut State Agencies §16-50j-2a(29), "Site" means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located.

RESPONSE:

Please refer to the attached "Overall Site Layout Plan" (Sheet 2.10) for the map clearly depicting the boundaries of the solar facility site ("Project Area") and the boundaries of the host parcel ("Site").

9. Pursuant to Connecticut General Statutes (CGS) §16-50o, submit a copy of the lease for the proposed facility site. Any confidential/proprietary information, such as financial terms, may be redacted.

RESPONSE:

There is no lease, but please see redacted Option to Purchase attached.

10. What is the length of the lease agreement with the host parcel owner?

RESPONSE:

The term of option is four (4) years expiring September 30, 2027.

11. In the lease agreement with the host parcel owner, are there any provisions 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:

There is no lease and there are no such provisions in the Option to Purchase.

12. Is the site parcel, or any portion thereof, part of the Public Act 490 Program? If so, how does the municipal land use code classify the parcel(s)? How would the project affect the use classification?

RESPONSE:

No.

13. What is the distance between the proposed facility site and the Eversource substation located at 49 Bokum Road?

RESPONSE:

The Project Site is located approximately 840 feet north of the Eversource substation at 49 Bokum Road.

Proposed Facility and Associated Equipment

14. What is the operational life of the facility?

RESPONSE:

The operational life of the facility is 20 years.

15. Referencing Petition Site Plan 3.02:

- a. how many tracker unit motors would be installed?

RESPONSE:

Between 40-45 tracker unit motors will be installed depending upon the final design.

- b. what is the lifespan of the tracker motors?

RESPONSE:

The lifespan of the tracker motors is approximately 30 years.

- c. how are the tracker motors powered?

RESPONSE:

The tracker motors are powered by energy produced by the solar array.

- d. at what height above grade are the tracker motors located?

RESPONSE:

The motor trackers would be located between 4 feet 6 inches and 5 feet above grade.

16. Do the tracker units have a snow accumulation sensor and the ability to tilt to shed snow?

RESPONSE:

Yes.

17. Provide the dimensions of the transformer and inverter pads.

RESPONSE:

The dimensions of the transformer pad are 76"x 76." There are no pads for inverters as they are mounted on piles.

18. Is the wiring from panels to the inverters installed on the racking system? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation maintenance, or animals?

RESPONSE:

Exposed wiring is installed on the slew beam located approximately 4-5 feet from the ground in compliance with the electrical code.

19. Referencing Petition p. 4, of the 240 foot long access road, what is the length of the proposed new portion?

RESPONSE:

The length of the proposed gravel access drive is 240 feet. This gravel drive connects to an existing paved driveway which provides access from Bokum Road.

20. Could the facility be reconfigured to provide a greater distance to the abutting property at 72 Bokum Road?

RESPONSE:

The placement of the solar panels is limited by an existing rock outcropping and excessively steep slopes to the north and east of the facility. Any significant reconfiguration of the array to increase the separation from 72 Bokum Road would likely result in the need for blasting of the existing rock outcroppings on-site.

21. What are the dimensions of the proposed concrete equipment pads?

RESPONSE:

The switchgear pad is approximately 8 feet by 10 feet.

Energy Output

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

RESPONSE:

TRITEC currently does not intend to participate in the ISO-NE Forward Capacity Auction.

23. What is the projected capacity factor (expressed as a percentage on an AC/AC basis) for the proposed project?

RESPONSE:

The projected capacity factor is 1284 factor.

24. Would shading reduce the energy production of the proposed project? If so, was this included in the proposed projects capacity factor?

RESPONSE:

Shading would reduce energy production and this was included in the proposed project's capacity factor.

25. 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?

RESPONSE:

Yes, individual inverters can shut off if they experience an event outside of their parameters.

Electrical Interconnection

26. Would the interconnection provide energy to a substation? If yes, which one? What substation upgrades are necessary to facilitate the project interconnection?

RESPONSE:

The project will interconnect to a three-phase distribution line; however, TRITEC does not know which Eversource substation or substations would take the energy.

27. What is the line voltage of the Eversource distribution circuit? Is it single-phase or three-phase? Does the distribution circuit require upgrades to support the proposed facility?

RESPONSE:

The line voltage of the Eversource distribution circuit is 13.8 kV at three-phase. Upgrades would be limited to the facility.

28. Referencing Petition p. 7, did the interconnection require a review from ISO-NE? What was the result?

RESPONSE:

No.

29. Referencing Petition p. 7, has the Interconnection Agreement with Eversource been completed?

RESPONSE:

Yes, the project has an Interconnection Agreement with Eversource.

30. Referencing Petition Exhibit A, p. 5, the standard utility pole height is 55 feet. However, the site plans show utility poles at 30 feet and 40 feet. Please clarify.

RESPONSE:

The standard utility pole height is 55 feet. The site plan callouts which reference 30 and 40 feet specify the on-center spacing between utility poles.

31. Referencing Petition Site Plan 2.11,
a. what equipment would be installed on each utility pole?

RESPONSE:

- i. Utility Pole 1 Eversource owned equipment**
- ii. Utility Pole 2 Eversource owned equipment**
- iii. Utility Pole 3 Eversource owned equipment**
- iv. Customer Pole 1 Utility disconnect switch**
- v. Customer Pole 2 Equipment protective relay switch**

- b. can the number of poles be reduced by consolidating equipment?

RESPONSE:

No.

Public Health and Safety

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

RESPONSE:

Yes, TRITEC designs and constructs all of its projects to comply with all relevant codes and standards.

33. Referencing Petition p. 6, how does the project comply with industry Best Management Practices for Electric and Magnetic Fields at solar facilities.

RESPONSE:

TRITEC designs and constructs all of its solar projects to meet all required state, federal, and local standards.

34. What is the name, distance and direction of the nearest federally-obligated airport from the site?

RESPONSE:

The nearest federally obligated airport is Groton–New London Airport, which is located over 17 miles east of the Site.

35. Are there manual facility shut-off switches that can be operated by emergency personnel? If yes, in what location(s)?

RESPONSE:

Yes. A disconnect switch is located on Customer pole 1.

36. 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:

On all proposed projects, TRITEC meets with the local fire department and follows all protocols established by that fire department.

37. Are there any sources of water for use by emergency responders within 0.5 mile of the site? If not, how will water be brought to the site?

RESPONSE:

On all proposed projects, TRITEC meets with the local fire department and follows all protocols established by that fire department.

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

RESPONSE:

Please see Emergency Response Plan attached.

39. Describe how the proposed facility would comply with the current Connecticut State Fire Prevention Code.

RESPONSE:

With all its projects, TRITEC meets with the local fire department to consult about fire safety measures and cooperates with the local fire department in creating a fire safety plan.

40. Referencing Petition p. 7, 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.

RESPONSE:

TRITEC is willing to provide such training and will contact local emergency responders to set up a time for such training.

41. Would the facility have lightning protection? If yes, describe.

RESPONSE:

No.

42. Describe how the proposed facility would comply with the Council's White Paper on the Security of Siting Energy Facilities, available at: https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/Docket_346/whitepprFINAL20091009114810pdf.pdf Would safety signs be located on the fence?

RESPONSE:

The project could not access the Council's White Paper on the Security of Siting Energy Facilities through the link provided by the Council. However, as a condition of approval, the project agrees to fully comply with all aspects of the White Paper, and safety signs shall be located on the fence.

Environmental Effects and Mitigation Measures

43. Referencing Petition p. 16, what is the status of the botanical study for state-listed plant species at the site? Do the study report findings require project design modifications to minimize impact to any state-listed species?

RESPONSE:

The botanical study was just concluded. Please see the survey and report attached. Although listed species have been observed on-site they are located well outside of the proposed limits of disturbance.

44. Referencing Petition Exhibit A, p. 5, is ERNMX-611 a pollinator friendly seed mix? Provide a seed mix specification sheet.

RESPONSE:

ERNMX-611 is a pollinator friendly mix, however, the specified seed mix within the array has been modified to be ERNMX-146 (Fuzz & Buzz Mix – Standard). This seed mix is low-

growing, easily maintained, and well-suited for solar installations. This seed mix is also pollinator-friendly. Seed mix specifications have been added to Sheet 3.01 attached.

45. Referencing Petition Exhibit A, Appendix A, Figure 8, the property at 72 Bokum Road is expected to have seasonal views of the project; however, referencing Exhibit A, p. 16, 72 Bokum Road is expected to have year-round views of the facility. Clarify.

RESPONSE:

The property of 72 Bokum Road is expected to have some seasonal visibility of the project, limited to a portion of the access drive. A line of evergreen trees are proposed along the southern edge of the array to mitigate year-round views of the facility.

46. Can fencing privacy slats or solid fencing be installed on the southeast side of the site, where the array faces 72 Bokum Road?

RESPONSE:

See response to 45 above. There is a plan for a line of evergreen trees to shield visibility of the project from 72 Bokum Road.

47. Referencing Petition Exhibit A, Appendix A, Figure 10, define “unfragmented forest.”

RESPONSE:

The term “unfragmented forest” is used by the US Army Corps of Engineers in their document, *Vernal Pool Best Management Practices (BMPs)*. This term refers to a corridor of forest with at least a partly-closed canopy of overstory (>50% cover) trees to provide shade, deep litter, and woody debris. Aerial imagery from Google Earth was used in conjunction with CT ECO’s *Forest Land Cover GIS* layer to approximate the limits of unfragmented forest both pre- and post-development to develop the figure and confirm that the project would comply with the Army Corps’ BMPs.

48. Would vibrations from the installation of racking posts cause well cracking or sediment loading?

RESPONSE:

It is not anticipated that vibration from any equipment installation will affect the nearby aquifers or groundwater quality. The project has also been designed such that any overland runoff will be protected from depositing sediment off the site by incorporation of a detailed erosion control plan, included with the site plans.

49. Would a Wetland and Vernal Pool Mitigation Plan be developed for the project?

RESPONSE:

There are no proposed direct impacts to wetlands or vernal pools as part of this Project, therefore a wetland and/or vernal pool mitigation plan is not applicable. Non-direct impacts are limited to minor tree/limb trimming for the installation of utility poles and overhead wires, as confirmed by CT DEEP in their comments issued for this petition filing. The limit

of disturbance for the project is over 100' from the vernal pool located in the southeast corner of the property.

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

RESPONSE:

The project has been designed with the US Army Corps of Engineers *Vernal Pool Best Management Practices (BMPs)* in mind to keep all disturbance outside of the 100' vernal pool envelope. The area located between the 100' and 750' buffer from a vernal pool is referred to as the Critical Terrestrial Habitat, and best management practices call for at least 50% of the area to remain forested. As currently designed, the project will exceed this recommendation and will maintain approximately 72.7% forested cover within the Critical Terrestrial Habitat.

Facility Construction

51. Referencing Petition Exhibit I - Geotechnical Engineering Report. It states support piles would be driven to a depth of up to 15 feet. How would the piles be installed if shallow bedrock is encountered?

RESPONSE:

Pre Drilling with a Rock Drill per manufacturer's approved methods.

52. What is the total estimate of cut and fill? If there is excess cut, where will this material be disposed of?

RESPONSE:

The proposed grading results in approximately 1,460 CY of cut and 4,180 CY of fill, resulting in a net import of 2,720 CY. Any material used on site will be properly screened before entering the facility.

53. Referencing Petition Site Plan 2.32, once Phase I is complete, followed by seeding, what time interval is necessary to establish stable ground cover prior to the commencement of Phase II? Who will determine the Phase I disturbed areas are stabilized?

RESPONSE:

The Site will be monitored by the conservation district which reports to DEEP and will make those determinations and instruct TRITEC accordingly.

54. The Petition site plans refer to the use of erosion control blankets. Can net-less or 100 percent natural fiber erosion control blankets be specified to reduce the potential for wildlife entanglement?

RESPONSE:

TRITEC typically uses 100 percent organic blankets but would be willing to utilize net-less or 100 percent natural fiber erosion control blankets if they are available at the time of

construction. TRITEC will inform the Siting Council if there is any trouble procuring an alternative type of blanket at the time of construction.

55. Has TRITEC consulted with the DEEP Dam Safety program regarding the proposed stormwater basin?

RESPONSE:

A pre-application meeting with DEEP was held on February 11, 2025, to discuss the project. The DEEP Stormwater Program did not express any concerns at the time of the meeting regarding needing to consult with the Dam Safety program. This is typically required when a proposed stormwater basin results in either (a) the creation of a berm which exceeds 4' in height from the existing grade or (b) the impoundment of greater than 3 acre-feet of storage within the basin. The proposed stormwater basin for this project does not meet either of these thresholds.

56. Has TRITEC applied for a DEEP Stormwater Permit for the proposed project?

RESPONSE:

The Stormwater General Permit application was recently submitted to DEEP. The approval of this permit is anticipated within 90 days.

Facility Maintenance

57. Referencing Petition Exhibit C- Operations and Maintenance Plan (O&M Plan), under what circumstances would herbicides be used to maintain vegetation at the site?

RESPONSE:

Herbicides will not be used and TRITEC has revised its O&M plan to reflect that it does not use herbicides. Please see attached.

58. What is the lifespan of the inverters and transformer? At what time interval would this equipment need to be replaced?

RESPONSE:

The life expectancy of the inverters and transformers is greater than the 20-year tariff agreement TRITEC has with Eversource.

Decommissioning

59. Does the lease agreement with the property owner specify any type of final land cover and/or soil restoration once decommissioning is complete? If yes, what specific ground cover will be used?

RESPONSE:

There is no lease. The Option to Purchase does not specify any type of final land cover and/or soil restoration once decommissioning is complete.

60. Would the stormwater basin remain in place or removed?

RESPONSE:

The stormwater basin would remain in place. The design of the stormwater basin is largely based upon the change in groundcover from woodland to meadow therefore the basin should remain in place for the long-term benefit of the watershed.