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November 12, 2025

VIA ELECTRONIC MAIL AND HAND DELIVERY
Melanie Bachman
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: PETITION NO. 1675 – Greenskies Clean Energy, 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 4.25-megawatt solar photovoltaic electric generating facility and associated equipment located on two parcels at 994 and 1010 Racebrook Road, Woodbridge, Connecticut, and associated electrical interconnection.

Dear Ms. Bachman:

I am writing on behalf of my client, Greenskies Clean Energy LLC, in connection with the above-referenced Petition. With this letter, I am enclosing the original and fifteen copies of the Responses to the First Set of Interrogatories issued by the Council on October 21, 2025, along with the exhibits that accompany these Responses.

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been submitted to all parties on the Petition's Service List as of this date.

Sincerely,

Lee D. Hoffman

Enclosures

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

PETITION NO. 1675 – Greenskies Clean Energy, 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 4.25-megawatt solar photovoltaic electric generating facility and associated equipment located on two parcels at 994 and 1010 Racebrook Road, Woodbridge, Connecticut, and associated electrical interconnection.	**Petition No. 1675**
	November 12, 2025

Petitioner Greenskies Clean Energy LLC ("Greenskies" or "GCE") hereby submits the following responses to the Interrogatories that were directed to Greenskies Clean Energy LLC by the Connecticut Siting Council on October 21, 2025.

Notice

1. Has Greenskies Clean Energy, LLC (GCE) directly received any comments since the petition was submitted to the Council? If yes, summarize the comments and state how these were addressed.

GCE has received quotes from the residents of 1000 Racebrook Road for screening options and is reviewing their proposed screening plan.

2. Referencing Petition pp.11-12, how were municipal concerns expressed during the April 2025 meeting addressed?

GCE ran through a description of the project and answered questions about stormwater and about the proposal to build on the easement. The municipality asked questions about what GCE proposed to build in the easement.

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

As indicated in Appendix N of the Petition, GCE sent notification letters to State Senator James Moroney and State Representative Mary Welander on May 22, 2025. GCE received receipts

confirming delivery of those letters on May 27, 2025. Other than the sending of those letters, no other outreach efforts were made to Sen. Maroney or Rep. Welander.

Project Development

4. What is the estimated cost of the project

The estimated cost of the project is slightly more than $7.5 million.

5. 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?

No.

6. Referencing Petition p. 1, when was the project selected for the Shared Clean Energy Facilities (SCEF) Agreement? What is the length of the SCEF Agreement?

The project was selected for the Shared Clean Energy Facilities ("SCEF") Agreement on May 10, 2024. The SCEF Agreement lasts 20 years.

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

GCE would expect the facility to seek other revenue mechanisms at the end of the SCEF Agreement period and would not anticipate decommissioning at that time.

8. If GCE transfers the facility to another entity, would GCE 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?

If GCE transfers the facility to another entity, GCE will provide notice of the entity responsible for management and operations of the Project and any outstanding conditions of the Declaratory Ruling and said entity's contact information.

9. Referencing Petition p. 7, GCE notes that, "A draft construction schedule timeline is included in sheet C05.02 of Appendix A." Sheet C-5.02 references a construction sequence only. Provide a projected construction schedule.

It is currently anticipated that construction will begin in Spring 2026, assuming all permits are in hand and that construction will be completed 6 months from then. A construction schedule is included as Exhibit B.

Proposed Site

10. Submit a map clearly depicting the boundaries of the solar facility site, the boundaries of the host parcel(s) and the locations of the proposed dual-use farm plans referenced in GCE's March 20, 2025 letter to the Department of Agriculture (DOAg), 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

Please see attached Exhibit C.

11. Pursuant to 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.

Please see attached Exhibit D.

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

The lease agreement is for 21 years after construction. GCE has the option of four (4) extensions to the lease, each extension lasting for (5) years.

13. Does the lease agreement(s) with the host parcel owner contain provisions for agricultural co-uses at the site? If yes, describe these co-uses.

Not explicitly, however the lease allows GCE to perform activities on the site necessary useful or appropriate to the solar farm which would include agricultural use.

14. 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.

At the conclusion of the lease, Petitioner is required to remove the solar farm, including any and all site improvements and infrastructure related to the project. GCE has six months to complete this work and is subject to all existing conditions of the lease during that time.

15. 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?

The parcel is not part of the PA 490 program.

16. Has 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.

17. Referring to Petition pp. 12, 17 and Appendix L DOAg documentation, provide the following information for the dual-use farm plan areas.

    a. What entity would manage these areas?

GCE would manage the dual use areas which would be included within the leased area.

    b. If the project is sold and/or transferred to another entity, would the sale and/or transfer include management and maintenance of these dual-use farm plan areas?

Yes.

    c. Who would be responsible for the maintenance of these areas? What type of maintenance is necessary and how frequently would maintenance activities occur?

The maintenance will be managed by either a qualified agricultural contractor, or a site operations team designated by the petitioner. Maintenance will include mowing, weed control, soil health monitoring and reseeding as needed.

d. who would be responsible for responding to concerns and/or complaints related to these agricultural co-uses?

Greenskies Clean Energy would be responsible for responding to such concerns.

e. How would contact information be provided for complaints?

GCE is amenable to placing signage on the project's fence that would provide telephone numbers for such complaints.

f. Identify the water source for irrigation of these areas.

The agricultural areas are being designed to rely primarily on natural precipitation for establishment and ongoing maintenance. The proposed vegetation mix will consist of native species that are well-suited to local soil and climate conditions.

18. If agricultural co-uses are implemented at the site, who would be responsible for responding to concerns and/or complaints related to these agricultural co-uses? How would contact information be provided for complaints?

As indicated in the Response to Interrogatory 17, GCE would be responsible. A phone number will be located on the array fencing.

19. Referencing petition p. 17 and Appendix L, does GCE have an agreement with the host parcel owner separate from the facility site lease for access and control over the dual-use farm plan? Does GCE have an agreement with the host parcel owner separate from the facility site lease to allow third party access to facility site for the dual-use farm plan? What if the host parcel owner seeks control over the dual-use farm plan areas for other purposes? What if the host parcel owner seeks to restrict third party access to the dual-use farm plan areas?

The landlord is not a farmer so there are no provisions in the lease that give the landlord the ability to farm. GCE will either need to perform agricultural activities itself or through a third-party farmer. Within the lease agreement, GCE has the ability to work with qualified third parties to ensure agricultural activities can take place. A third-party farmer has not been selected at this time therefore no separate agreement exists yet. Another agreement is not necessary with the landowner since the lease agreement itself grants Greenskies the ability to retain a third-party farmer to perform ag work. Greenskies is leasing the land where the farming activities are proposed to take place. The landlord cannot seek control over land that is currently being leased by the Tenant,

without Tenants consent. If the landlord restricted third party access to the site, the landlord would be in breach of the lease agreement.

20. Referencing Petition p. 13, submit a copy of the Town approval of the drainage easement encroachment.

Please find attached Exhibit A.

Energy Output

21. Will clearing be required beyond the limit of disturbance shown on Site Plan C2.00 to prevent or reduce solar array shading?

As currently shown, additional clearing is not required outside of the isolated pockets of trees within the array footprint and in limited areas near the fenceline. The array has been laid out in such a manner as to utilize the open area from the golf course without the need for clearing and grubbing in wooded areas.

22. Would GCE sell electricity, capacity and renewable energy credits produced by the facility to The United Illuminating Company (UI)?

Yes.

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

At this time, GCE does not anticipate that the project will be participating in the ISO-NE Forward Capacity Auction, however, GCE reserves the right to participate in the Forward Capacity Auction in the future.

24. What is the projected annual capacity factor for the proposed project?

The projected annual capacity factor for the proposed project is 21%.

25. Referencing Petition p. 6, have electrical loss assumptions been factored into the output of the facility? What is the output (MW AC) at the point of interconnection?

Yes, electrical loss assumptions have been factored into the output of the facility. The MW AC output at the point of interconnection is 4.125 MWAC.

Proposed Facility and Associated Equipment

26. Referencing sheet C-2.00 of Appendix A, what do the two marked/delineated sections CX.01 and CX.02 represent?

CX.01 and CX.02 are matchlines indicating the view windows for each subsheet (the .01 and .02 sheets).

27. Referencing Petition p. 5 and Appendix A, what section of the solar array would consist of 615 watt panels and what section will consist of 670 watt panels? Provide a quantity for each.

There are 8,112 panels in total. The design consists of approximately 67/33 split with 2,016 670-W panels and 6,096 615-W panels. The specific locations of 615 and 670 W panels are unknown at this stage.

28. Would the exclusive use of 670-watt panels reduce the solar array footprint? If yes, indicate the reduction in acreage.

No, the exclusive use of 670-watt panels would not reduce the solar array footprint; rather, acreage would increase by approximately 1%.

29. Would the inverters be installed at the end of solar array rows or on the concrete pad by the access drive? Where are the combiner boxes located?

The inverters would be installed on the concrete pad. While the exact location of the combiner boxes has yet to be determined, they are anticipated to be installed at end of solar array rows.

30. Reference Petition Site Plan 2.00:

    a. how many tracker unit motors would be installed?

Approximately 7 drive line motors will be installed.

b. what is the lifespan of the tracker motors?

30 years.

c. how are the tracker motors powered?

The motors will be powered by the facility.

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

No, they have the ability to shift to shed snow as they move, but the function is not specific for shedding snow.

32. Referencing Petition p. 6, it states 24 inverters are proposed; however, Appendix M references 34 inverters are proposed. Clarify.

34 inverters are proposed for this project in the petition.

33. Referencing Appendix A sheet C-5.01, what is the maximum height from grade to the bottom edge of the panels? What is the maximum height from grade to the top edge of the solar panels? Will the panels be mounted in a portrait or landscape fashion?

The maximum height from grade to the bottom edge of the panels will be approximately 6 feet. The maximum height from grade to the top edge of the solar panel will be approximately 9.4 feet. The panels will be mounted in a landscape fashion.

34. Referencing Petition p. 5 what is the length of the driven posts and to what depth would the posts be driven into the ground to provide the required structural stability?

The posts are currently anticipated to be installed as driven piles. The depth is typically between 7-12 feet but final structural design will take place following a geotechnical foundation testing investigation in consultation with the racking manufacturer to determine depth, and final product, based on site conditions.

35. How many panels will each rack hold?

While it depends on how a rack is defined, one string is approximately 26 panels.

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

Photovoltaic wire is typically run on, and supported by, the racking. The specified wiring is typically UV rated to protect from degradation from sun exposure. If a jumper is required (e.g., when DC wiring must go from one row to the next) or when a run must go from the racking to the inverter, or row to row, the wire is typically run through conduit that protects the wiring from exposure. Such conduit is buried and comprised of PVC.

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

The nearest property lines from the requested proposed infrastructure are as follows:

- Proposed solar field perimeter fence ±25 feet from Racebrook Road right-of-way to east or ±28 feet from 1000 Racebrook Road (Parcel 3201-1520-1000) to southeast for residential use.
- Proposed transformer pad ±220 feet from 883 Greenway Road (Parcel 3102-730-883) to southwest or ±318 feet from 19 Homewood Drive (Parcel 3201-840-19) to northwest for residential use.
- Proposed access drive ±0 feet connecting to Racebrook Road right-of-way to east or ±60 feet from 1000 Racebrook Road (Parcel 3201-1520-1000) to southeast for residential use.

The nearest known off-site residences from the requested proposed infrastructure are as follows:

- Proposed solar field perimeter fence ±70 feet from residence located at 1000 Racebrook Road (Parcel 3201-1520-1000) to southeast.
- Proposed transformer pad ±370 feet from residence located at 19 Homewood Drive (Parcel 3201-840-19) to northwest.
- Proposed access drive ±128 feet from residence located at 1000 Racebrook Road (Parcel 3201-1520-1000) to southeast.

38. Provide a site plan that shows the transformer pads.

The updated site plans submitted as part of these interrogatory responses now specifically call out the locations of the proposed transformer pads. They are included as Exhibit N.

39. Provide the approximate dimensions of the proposed equipment pads.

The estimated footprint of each pad is as follows: System A: 60 feet x 11 feet, System B: 68 feet x 11 feet, MV Equipment: (3) 6 feet x 6 feet. Please note that these estimates are subject to change pending equipment submittals.

40. What is the length (in feet) of the existing access road? Referencing sheet C2.02 of Appendix A provide the length of the utility access drive.

The length of the existing access road is approximately 2,150 feet. The length of the utility access drive in sheet C2.02 of Appendix A is approximately 77 feet.

41. List the equipment that would be installed on the proposed equipment pads. Would the project have one or more transformers? Explain.

Each equipment area will have the following: transformer, grounding transformer, switchboard, monitoring equipment mounted on a rack, and inverters mounted on a rack. There will be 17 inverters in equipment area A and 16 inverters in equipment area B.

42. What is the aisle width between the solar panel rows from panel edge to panel edge? What is the minimum aisle width at which the solar panel rows could be installed?

The aisle with is ten feet, the minimum aisle width is eight feet.

43. Provide a Federal Emergency Management Agency flood zone map that includes the host parcel.

See Attached Exhibit E.

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

At least twenty years, with the possibility of being longer depending on market conditions.

Electrical Interconnection

45. Please provide the electrical drawing referenced on sheet 2.02 of Appendix A.

Please find attached Exhibit F.

46. Referencing Petition p. 6, what is the status of the facility study with UI? Has the interconnection agreement been completed.

The facility study has been completed, and GCE expects to have a completed interconnection agreement this month.

47. Referencing Petition p. 6, does the Project interconnection require a review from ISO-NE?

No.

48. Would any off-site upgrades to the existing electric distribution system be required (e.g. distribution line upgrades and/or upgrades from single to three phase)? If yes, describe.

Yes, UI will need to replace the June Street Substation Load Tap Charger controls and will be removing a 100K fused cutout on Racebrook Road (Pole 484), replacing the protection device with a Recloser on the pole (486).

49. What percentage of the facility output would be supplied to low-and moderate-income customers? Where will the remaining be supplied?

While the utility is in charge of dispersing the output, all of the output is going to LMI customers.

50. At what point will the underground electrical connection transition to an overhead progression to connect to the distribution system? Are any new poles required? Identify the equipment that would be installed on the proposed utility poles.

The updated site plans submitted as part of these interrogatory responses include the identification of equipment, poles and overhead/underground routings. Please find the electrical plan attached as Exhibit F.

51. Referencing Petition p. 6 and Sheet C-3.02, what is the approximate height of the existing interconnection pole above grade? What would be the approximate height of the proposed utility poles?

The Applicant has not received specific design parameters for the height of the proposed utility poles yet, but it is currently anticipated that the height would be similar to those of the existing circuit along Racebrook Road. Notwithstanding these facts, it is estimated that the existing poles proposed to be connected to are approximately 30 feet in height.

Public Health and Safety

52. Referencing Petition p. 8, describe the features integrated within the monitoring platform to ensure safe operation of the facility. Will the monitoring platform automatically de-energize the system during abnormal events? At what location/component will de-energization occur?

Our monitoring systems do not automatically deenergize sites, but the individual switches (OCPD) will open in the event of faults, as will the utility cutout fuses if the fault extends beyond the main breakers. The monitoring system simply monitors the system, but the settings within the devices will cause equipment to open.

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

Yes.

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

The project will comply with all relevant codes and standards, including, but not limited to, the Connecticut State Building Code, National Electrical Code, National Electrical Safety Code, Connecticut State Fire Prevention Code, and National Fire Protection Agency requirements.

55. How would the project comply with industry Best Management Practices for Electric and Magnetic Fields at solar facilities?

According to the Council's revised EMF Best Management Practices dated February 7, 2014, the Council recognized that a 2010 guideline established 2,000 mG as an acceptable exposure level to EMF. The Council also recognized that there is scientific consensus that there is no cause-and-

effect link with EMF and any health effect, and that "scientific evidence to date does not warrant the establishment of MF exposure limits" surrounding transmission lines. 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, GCE is not aware of any BMPs for EMF at solar facilities.

56. 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?

Yes.

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

Yes there are, these switches are referenced in the plans that are included with these Interrogatory Responses. There is a GOAB switch on the utility pole connecting to the grid and a solar generator disconnect switch located on the pads. There are also breakers in the meter cabinets which are also in the pad.

58. 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 the main switch. 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.

59. In the event of a shut-down/de-energization, would the panels still produce and send power to the inverters? Could energized components pose a safety risk to emergency responders?

Yes the panels would send power to the inverters, however, this would only pose a safety risk if personnel cut the wires connecting the panels, the combiner box, and the transformers. If the

system is shut down, the module level conductors will still be energized. This could pose a safety risk to emergency responders; however, that risk is mitigated by proper signage and education for first responders so that they do not do anything that would cause them harm. Greenskies has prepared an Emergency Response Plan and will coordinate with the local fire department to ensure proper training and safety protocols are in place. See Exhibit G.

60. Could the entire facility be shut down and de-energized in the event of a fire? If so, how?

Yes, through the disconnects referenced in Responses 57-59.

61. 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.

62. 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?

Water would need to be trucked to the site, however, it is GCE's understanding that the Woodbridge Fire Department has three tanker trucks with a total capacity of 8,000 gallons. Please see: https://www.firenews.org/ct/w/woodbridge/woodbridgect.html.

63. Provide an Emergency Response Plan for the proposed facility that includes methods for fire response, procedures for contacting the fire department and municipal officials based on the type(s) of emergency, post-incident inspections and reporting, and notification to state and municipal officials regarding site re-energization.

See attached exhibit G.

64. How would site access be ensured for emergency responders?

GCE would provide first responders with a knox box that would allow them to access the facility.

65. What type of oil is within the transformers? Do the transformers have a containment system in the event of a leak? Can the remote-monitoring system detect an insulating oil leak?

The insulating oil would be specific to the manufacturer that GCE purchases the transformer from. It is generally mineral oil, silicone transformer oil, or in some cases Less Flammable Seed Oil. Leak detection is an optional add-on. GCE typically procures transformers with drain valves and sampling devices, as well as magnetic liquid level gauges which help determine the amount of fluid in the tank.

66. Provide a Spill Prevention and Response Plan for construction including notification procedures to the Department of Public Health Drinking Water Section, Regional Water Authority, Quinnipiack Valley Health District, and Department of Energy and Environmental Protection (DEEP).

A Draft Spill Prevention and Response Plan has been provided as Exhibit H. It is anticipated that the Final Spill Prevention and Response Plan will be prepared under consultation with the yet-to-be-selected site contractor.

67. Identify the distance/direction of the nearest federally-obligated airport from the proposed site

The nearest known federally-obligated airport is approximately 5.25 nautical miles to the southwest of the project site (Sikorsky Heliport, JSD). See Appendix J of the Petition for the documentation.

68. Would notice to the Federal Aviation Administration be necessary for the temporary use of a crane during construction? Explain.

The Notice Criteria Tool was run with a crane use up to 199 feet above ground and was found to not exceed Notice Criteria. It is anticipated that any cranes required for construction will be below the 199 feet AGL. See Appendix J of the Petition for the documentation.

69. Describe how the proposed facility would comply with the Council's Docket No. 346 - White Paper on the Security of Siting Energy Facilities. Would safety signs be located on the fence?

Below are the following ways in which the proposed facility complies with the Council's White Paper on the Security of Siting Energy Facilities, including through planning, preparedness, response, and recovery methods.

A. Planning

- **Vulnerability Identification**

The primary security risks for the project include trespassing, theft of solar panels or copper wiring, vandalism of inverters and transformers, and potential sabotage of grid interconnection equipment.

- **Facility Characteristics**
    - The facility will be enclosed with an 8-foot-high agricultural-style fence.
    - Access will be restricted to a gated entry point secured with locks.
    - Critical equipment (inverters, switchgear, and transformers) will be housed within the locked area.
    - Structures and poles will be kept a sufficient distance from the fence perimeter to minimize the potential use of the structure itself to scale the fence.
- **Interdependencies**
    - The Project interconnects to Circuit 1605 which is connected to June Street Substation, a facility owned and operated by United Illuminating.
    - Petitioner coordinates with the utility to ensure redundancy and rapid restoration in the event of an interruption.
- **Awareness**
    - Petitioner will monitor updates from the Connecticut Department of Emergency Management and Homeland Security ("DEMHS"), local law enforcement, and utility partners to ensure timely situational awareness of threats.

B. Preparedness

1. **Support Infrastructure**
    - Remote Monitoring system will monitor the site and equipment areas 24/7.
    - Remote monitoring systems will provide real-time alerts to the operations center.
    - Ensure all gates are in working order, and that visitor, contractor, and employee access controls are enforced.
2. **Personnel Coordination**

- Local police and fire departments will be provided with site maps, access protocols, and emergency contact information.

3. Access Control

- Authorized persons will adhere to access control procedures and prevent tailgating or other unauthorized entry.
- Limit facility access to required visitors, personnel, and vehicles.

C. Response

1. **Access to Information**

- Security incidents requiring external notification (e.g., theft, vandalism, equipment damage, or safety threats) will be reported promptly to local law enforcement, and the utility if needed.
- Petitioner will comply with Council procedures for submitting sensitive information under protective orders.

2. **Mitigation Measures**

- Spare panels, inverters, and transformers will be stocked or available through existing supplier agreements.
- The Project's design allows for partial operation if individual arrays or equipment are taken offline.

D. Recovery

1. **Recovery Measures**

- Following any incident, Petitioner will prioritize restoration of power output and secure the site for continued safe operation.
- Natural resource impacts resulting from a security incident (e.g., soil disturbance, fire) will be restored in coordination with state and local authorities.

2. **Reporting and Improvement**

- All incidents will be documented and reviewed to assess response effectiveness.
- Petitioner will update security protocols as needed, incorporating feedback from law enforcement and emergency responders.

Prior to any construction activities, the limits of disturbance will be marked with construction fence barriers with accompanying signage.

Environmental Effects and Mitigation Measures

70. Referencing Petition p. 16, provide the Phase I Environmental Site Assessment prepared by VHB.

The overall conclusions and summary of the Phase I ESA have been included as Exhibit I.

71. Referencing Petition p. 12, during the January 15, 2025 meeting how were DEEP's concerns regarding stormwater controls, tree clearing, and visual and noise impacts addressed? Please describe any recommendations, comments or concerns about the project that were discussed.

GCE would like to correct the date that a meeting was held with CTDEEP Concierge on from January 15, 2025 to February 7, 2025. The official notes from the February 7, 2025 Concierge Meeting with CTDEEP have been included in the Interrogatory Responses. Please refer to Exhibit J.

72. Has GCE submitted an application for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities to DEEP? If yes, what is the status of such permit?

GCE has not submitted the application for a General Permit at the time of this response. It is anticipated that the application will be submitted further along in the permitting process, as that permit application is typically tied to final construction documents.

73. What type and quantity of insulating fluid would be used within the transformers? Do the transformers contain a leak detection and/or containment system?

The insulating oil would be specific to the manufacturer that GCE purchases the transformer from. It is generally mineral oil, silicone transformer oil, or in some cases Less Flammable Seed Oil. Leak detection is an optional add-on. GCE typically procures transformers with drain valves and sampling devices, as well as magnetic liquid level gauges which help determine the amount of fluid in the tank.

74. Referencing Petition p. 12, how were the abutters concerns about visibility addressed?

GCE met with abutters and conducted a visual simulation. GCE discussed the possibility of some light screening in the northwest corner for the owner of 19 Homewood road, and possible forms of screening that would be acceptable to the resident of 1000 Racebrook Road. The owner of 1000 Racebrook road agreed to find quotes for the preferred screening method, and GCE is reviewing those quotes.

75. Referencing Petition pp. 13, and 16 what is the status of the photo simulation study? Indicate the type and location of proposed landscaping/screening measures and alternative style fencing.

The photo simulation has been completed. The screening measures proposed by the residents of 1000 Racebrook and under review by GCE include an 8 foot tan fence with white columns, solar lights, and 6 foot imperial arborvitaes.

76. Is the Town of Woodbridge located within a DEEP designated Northern Long-eared bat (NLEB) observation area? If yes, what construction procedures can be undertaken to reduce potential impacts to NLEB?

Per the CTDEEP NLEB Observations by Town Map, dated July 24, 2023, Woodbridge is not indicated to have any known occurrences of the NLEB. Refer to Exhibit K for the map.

77. Is the construction limit of disturbance within 100 feet of any Cold Water Habitat?

Based on a review of the CTDEEP Cold Water Habitat Map viewer, the project site is located outside of any known Cold Water Habitat watershed. Refer to Exhibit L.

78. Referencing Sheet C-2.00 of Appendix A, please provide the following:

    a. Acreage of tree clearing only; and

No trees are currently proposed to be only cleared. All clearing will also be grubbed as the site is mostly open with limited areas of hedgerow trees between fairways.

    b. Acreage of tree clearing and grubbing.

Approximately 0.8 acres of trees will be cleared and grubbed to construct the facility.

79. What is the minimum aisle row spacing for efficient operation of this facility? If a narrower aisle width was used, by how many acres would the facility footprint be reduced?

The minimum aisle row would be 8 feet. While the reduction in row spacing might reduce the facility footprint, the Petitioner would seek to maximize energy generation by adding more panels, therefore the footprint of the facility would ideally remain unchanged.

80. Would the proposed facility site footprint require additional stormwater detention when compared to a project with narrower aisles?

Narrower aisles could result in a smaller overall footprint for the array that would require less stormwater detention generally, as less constructed area would be conveyed to the stormwater basins. However, it is important to note that reducing aisle spacing would result in increased row-to-row shading and generate less total electricity through the lifespan of the project, requiring the petitioner to use more panels to maximize energy generation.

81. Referencing Petition p. 17 and Appendix A sheet C-2.01, describe measures to protect the existing stone wall during construction.

Ultimately, the selected contractor would be responsible for means and methods for protecting the stone wall. At this time, it would be anticipated that a construction fence around the sections of wall to be maintained would be adequate to provide protection, and a note has been added to the site plans that are attached to this response document.

82. Where is the nearest publicly accessible recreational area from the proposed site? Describe the visibility of the proposed facility from this recreational area.

The applicant is not aware of a publicly-available list of recreational areas mapping, but it is estimated that the nearest recreational area open to the public is the Racebrook Tract in both Woodbridge and Orange, CT, approximately 1,500 feet to the southeast. The tract lies on the other side of Wilbur Cross Parkway (Route 15) and does not appear to have any direct sight lines to the proposed solar project. Therefore, the Project is unlikely to have visual impacts on this area.

83. Where is the nearest national, state and/or locally-designated scenic road from the proposed site? Describe the visibility of the proposed project from the nearby scenic road(s).

The applicant is not aware of a publicly-available list of recreational areas mapping, but it is estimated that the nearest recreational area open to the public is the Racebrook Tract in both

Woodbridge and Orange, CT, approximately 1,500 feet to the southeast. The tract lies on the other side of Wilbur Cross Parkway (Route 15) and does not appear to have any direct sight lines to the proposed solar project. Therefore, the Project is unlikely to have visual impacts on this area.

84. Submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

A Photo Log has been included as part of the Interrogatory responses. Please see Exhibit M.

Facility Construction

85. Has GCE consulted with the DEEP Dam Safety program regarding permitting requirements, if any, for the proposed stormwater basins? Explain.

CTDEEP did not include the Dam Safety Program in the Concierge Meeting on February 7, 2025. Based on the meeting notes, if basins were to be constructed above existing grade to detain water, the Dam Safety Program would need to be consulted. The proposed basins have small areas of fill on the backslopes, but the general intent is to cut them into existing ground and not construct a dam-like structure.

86. 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?

Yes, GCE will usually use burlap for erosion control.

87. With regard to earthwork required to develop the site, provide the following:

a) Will the site be graded? If so, in what areas?

Grading is only proposed to excavate stormwater basins and the required swales to collect stormwater and direct to the basins.

b) What is the desired slope within the solar array areas?

Within the array area, slopes up to approximately 15% are generally tolerable for construction and racking infrastructure. Existing slopes generally fall well below that upper limit across the site.

c) Could the solar field areas be installed with minimal alteration to existing slopes?

Yes, the intent is to perform minimal grading outside of swales and stormwater basins.

d) If minimal alteration of slopes are proposed, can existing vegetation be maintained to provide ground cover during construction?

As part of the coordination with DoAg, pollinator-friendly, perennial forbs, and warm-season grasses were proposed to regenerate soil health and support infiltration. The mix proposed includes mint, oregano, red clover, thyme, yarrow and ernst. During construction, it is proposed to promote

that existing vegetation remain in areas that are not yet disturbed to help support erosion controls and reduce sediment transport, as opposed to stripping topsoil throughout the project area immediately.

e) Estimate the amounts of cut and fill in cubic yards for the access road(s)

It is estimated that approximately 700 cubic yards of cut will be generated for the access roads to accommodate up to an 8 inch thick gravel section of road base material.

f) Estimate the amounts of cut and fill in cubic yards for solar field grading.

Grading is not currently proposed within the solar field. The only grading proposed is related to stormwater basin construction.

g) If there is excess cut, will this material be removed from the site property or deposited on the site property?

Based on the soil management plan submitted to DoAg, it is recommended that soil stays on site and if hauled, it should be tested prior to removal. Final determinations on handling of excess soil will be coordinated with the selected site contractor responsible for constructing the project.

88. How would the posts (that support the racking system) be driven into the ground? In the event that ledge is encountered, what methods would be utilized for installation?

The posts are currently anticipated to be installed as driven piles. The depth is typically between 7-12 feet, but final structural design will take place following a geotechnical foundation testing investigation in consultation with the racking manufacturer to determine depth, and final product, based on site conditions. In case of bedrock pre-drilling may be required.

89. Has a comprehensive geotechnical study been completed for the site to determine if site conditions support the overall Project design? If so, summarize the results. Was any tree clearing necessary to perform the geotechnical study? If so, where?

A Geotechnical Report was prepared by Down to Earth Consulting, LLC, dated February 2025. The report outlines the findings of the field investigations and provides preliminary recommendations for foundations, piles and materials. The methods provided support the overall project design and did not present information that would hinder development. Based on the boring

locations, tree clearing was not required in order to access the site since it is a golf course with large tracts of open areas.

90. Would any blasting be required to develop the site or stormwater features?

It is not anticipated that any blasting will be needed to develop the site or any stormwater features.

91. Referencing Petition p. 18, approximately how many vehicles would visit the site daily during site construction? Where would the vehicles park?

The average number of vehicles would be between 2 and 14 depending on the stage of work that the project is in. The most employees will be onsite during the racking and module installation. The vehicles would park within the leased area and would be staged based on the work being completed in the field.

92. Submit a construction fuel materials storage, refueling and spill response plan with applicable contact information.

Please see Exhibit H.

Facility Maintenance

93. Would the inverters, tracker motors, and transformers last the life of the project? If not, at what time interval would the inverters need to be replaced?

The inverters and tracker motors are expected to last for ten years. The transformers are expected to last the life of the project.

94. Referencing Petition p. 19, how often would the panels be cleaned? Besides water, what equipment and substances would be used?

The project is not anticipated to need cleaning on a specified regular basis, however in situations when cleaning is required the only substance used will be water.

95. Would replacement modules be stored on-stie in the event solar panels are damaged or functioning property? If yes, in what location?

Replacement modules will not be stored on site.

Decommissioning

96. Does the lease agreement with the host parcel 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?

The lease agreement does not specify.

97. 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 yes, submit information that indicates the proposed solar modules would not be characterized as hazardous waste. If not, would the Petitioner agree to install solar panels that are not classified as hazardous waste through TCLP testing.

GCE has not finalized the modules for this project yet, and does not have testing for the QCell modules submitted earlier. However, the Heliene 144HC M10SL 540W Bifacial module is being considered for this project, and the TCLP report for this module is attached as Exhibit O. It is possible that modules will change, if the modules do change, Petitioner can submit additional TCLP testing for the proposed modules. Petitioner agrees to install solar panels that are not classified as hazardous waste, as long as panels that fit the project requirements and have that classification are available at the time of procurement and construction. GCE does not control the supply chain of PV modules and due to national and global politics that supply is sometimes limited.