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December 17, 2025

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

Re: Petition 1684 – Greenskies Clean Energy LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 4.625-megawatt AC solar photovoltaic electric generating facility and associated equipment located on two parcels (Parcel Nos. 21-19-29 and 21-19-2) off Gager Hill Road, Scotland, Connecticut, and associated electrical interconnection.

Dear Ms. Bachman:

I am writing on behalf of my client, Greenskies Clean Energy LLC ("Greenskies" or the "Petitioner"), in connection with the above-referenced Petition. With this letter, I am including the original and fifteen copies of the Responses to the Interrogatories issued by the Council on November 26, 2025.

Electronic copies of this filing and related exhibits are available for download at the following link: https://pullcom.sharefile.com/d-s67fd20fb58fd427eaaebf90590bba32f.

Should you have any questions concerning this submittal, please contact me or Kate Boucher of this office at your convenience.

Sincerely,

Lee D. Hoffman

Lee D. Hoffman

Enclosures

cc: Petition 1684 Service List

ACTIVE/81669.14/KEBOUCHER/20798924v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Greenskies Clean Energy LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 4.625-megawatt AC solar photovoltaic electric generating facility and associated equipment located on two parcels (Parcel Nos. 21-19-29 and 21-19-2) off Gager Hill Road, Scotland, Connecticut, and associated electrical interconnection.	**Petition No. 1684**
	December 17, 2025

Petitioner Greenskies Clean Energy LLC hereby submits the following responses to the Interrogatories that were directed to Greenskies Clean Energy LLC by the Connecticut Siting Council on November 26, 2025.

Notice

1. Referencing Petition pp. 14-16, 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 comments were addressed.

Yes. On July 29, 2025, Laschone Garrison, an Environmental Analyst with the Connecticut Department of Energy and Environmental Protection ("DEEP"), requested to conduct a site visit via email in support of DEEP's comments to the Siting Council. Ryan Linares, a representative from Greenskies, met them on-site on August 1, 2025, to guide them around the property.

On July 29, 2025, Dana Barrow, the first selectman of Scotland, requested via email that GCE provide screening for the residents of 119 Huntington Road. GCE followed up with that resident, Cindy Habeeb, who agreed to a visual simulation as a first step in determining if visual screening would add value. Since then, GCE and the homeowner continue to discuss scheduling the necessary field work for that visual assessment.

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

As indicated in Appendix I of the Petition, GCE sent notice letters to State Senator Mae Flexer and State Representative Doug Dubitsky on July 23, 2025. Both Senator Flexer and Representative Dubitsky received the letters, as indicated by the return of the mail receipts received by GCE's counsel on July 26, 2025. GCE has not received comments from either legislator.

Public Benefit

3. If the facility operates beyond the terms of the Non-residential Renewable Energy Solutions (NRES) contract, 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 NRES Agreement period and possibly extend the life of the system and would not anticipate decommissioning at that time.

4. Would Eversource Energy (Eversource) purchase the electricity, capacity and renewable energy certificates for the facility?

Yes, Eversource Energy has agreed to purchase the electricity, capacity, and renewable energy certificates from the facility through an NRES Buy-All Tariff Agreement.

5. Referencing Petition p. 2, is the NRES Tariff Terms Agreement (TTA) with Eversource for the entire facility output?

Eversource Energy will purchase 100% of the facility output through the NRES Buy-All Tariff Agreement.

Facility Development

6. What is the estimated cost of the proposed facility?

The estimated cost of the proposed facility is approximately $10.1 million. This cost does not reflect the upgrades to the electric distribution system. GCE is awaiting finalized distribution system upgrade costs from Eversource.

7. Is the facility, or any portion of the facility, 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.

8. When submitting a bid into the NRES Program, is there a requirement to identify alternative sites within a proposal?

No.

9. **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?**

Yes.

Proposed Site

10. **Is the site located within an Environmental Justice Community?**

No. Based on the DEEP "Connecticut Environmental Justice Communities" Map, this site is not considered either within the "Environmental Justice Block Group 2024" or an "Environmental Justice Distressed Community 2025."

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 Exhibit A for a copy of the redacted lease.

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

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

13. **In the lease agreement with the host parcel owner, are there any provisions for agricultural activities at the site? If yes, describe these agricultural activities.**

Not explicitly. However, the lease grants GCE or a third party the ability to use the site to support the Solar Farm, which could 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 facility's useful life? If so, please describe and/or provide any such provisions.**

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

GCE would be responsible for responding to concerns and/or complaints. A phone number will be located on the array fence to reach a member of Greenskies Clean Energy's staff.

16. 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 facility affect the use classification?

Yes. Parcel 21-19-29 has 20.00 acres and parcel 21-19-2 has 79.00 acres that are part of the Public Act 490 Program. It is possible that once Project construction is completed, the portion of that parcel that contains the solar facility may no longer be eligible for farm, forest or open space classification under Public Act 490 Program. However, as state law sets no minimum size for farmland, the Project would not remove the rest of the parcel from the program but would simply change the amount of acreage subject to it. For more information please refer to: https://portal.ct.gov/doag/commissioner/commissioner/public-act-490---the-basics?language=en_US.

17. Has the Department of Agriculture purchased any development rights for the facility site or any portion of the facility site as part of the State Program for the Preservation of Agricultural Land?

No.

18. Referencing Petition p. 4, how many acres of the host parcel are currently in productive agricultural use?

There are approximately 48.4 acres currently in agricultural use in both parcels.

19. Referencing Petition pp. and Appendix M, provide the following information for the agricultural activity areas:

a. What entity would manage these areas?

Greenskies Clean Energy would be ultimately responsible for managing the agricultural activity areas, which would be included within the leased area. However, the selected agricultural contractor would manage any day-to-day agricultural operations.

b. If the facility is sold and/or transferred to another entity, would the sale and/or transfer include management and maintenance of these agricultural activity 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 activities?

Greenskies Clean Energy would be responsible.

e. How would contact information be provided for complaints?

A telephone number will be posted on a sign on the array fence to reach a member of Greenskies' staff.

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 will consist of species that are well-suited to local soil and climate conditions.

20. Referencing Petition p. 17 and Appendix M, does GCE have an agreement with the host parcel owner separate from the facility site lease for access and control over the agricultural activity areas? Does GCE have an agreement with the host parcel owner separate from the facility site lease to allow third party access to the facility site? What if the host parcel owner seeks to restrict third party access to the agricultural activity areas?

Greenskies is leasing the land where the farming and solar project activities are proposed to take place. 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 retain a third-party farmer to undertake these activities. A third-party farmer has not yet been selected.

Proposed Facility and Associated Equipment

21. What are the approximate dimensions (LxWxH) of the transformer and switchgear that would be installed on each concrete pad?

The approximate dimensions of each transformer will be 90 x 96.8 x 83.1 inches. The approximate dimensions for each switchboard will be 90 x 60 x 48 inches.

22. Are the inverters mounted on a post-mounted racking system? What is the height above grade of the inverter/racking system?

The inverters will be mounted on a structural post or pile at a minimum of 3 feet above grade.

23. 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?

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.

24. Referencing Petition Site Plan C103, what is the acreage of the three fenced solar array areas?

The total acreage (and square footage) of each fenced solar array area are as follows:

- Western Field = 4.10 acres (178,474 square feet)
- Central Field = 5.26 acres (229,190 square feet)
- Southern Field = 9.71 acres (423,122 square feet)
- Total = 19.07 acres (830,786 square feet)

25. For each of the three array areas, provide the distance, direction and address of the nearest residential property line and nearest residence, not owned by the host parcel owner, from the solar array perimeter fence.

The following details all abutter linear distances to the closest solar array perimeter fence (survey was limited to subject parcels; adjacent residences not available):

- Parcel ID 21-19-3 (177 Huntington Road), Anthony Jr. & Leahbeth Scandura
    - Twenty-six (26) linear feet due south to the Western Field
- Parcel ID 21-19-5 (165 Huntington Road), Pauline & Guy Passarello
    - Fifty (50) linear feet due south to the Western Field
- Parcel ID 21-19-32 (119 Huntington Road), Jason & Cynthia Habeeb
    - Twenty-One (21) linear feet due south to the Central Field
- Parcel ID 21-19-34 (119 Huntington Road), Suzanne Krach
    - Seventy-Three (73) linear feet due south to the Central Field
- Parcel ID 21-19-8 (75 Huntington Road), Kathleen & Michael Romeo
    - Forty-Eight (48) linear feet due west to the Central Field
- Parcel ID 21-19-28 (54 Gager Hill Road), John & Marie Beck
    - Fifty (50) linear feet due west to the Southern Field
- Parcel ID 21-19-26 (94 Gager Hill Road), Mathew & Heather Blanchard
    - One-Hundred Fifty-Eight (158) linear feet due north to the Southern Field
- Parcel ID 21-19-7 (126 Gager Hill Road), Linda Bird
    - One-Hundred Fifty-Three (153) linear feet due north to the Southern Field
- Parcel ID 21-19-5 (265 Gager Hill Road), Jeffrey & Austin Tandetzke
    - One-Hundred Sixty-Eight (168) linear feet due north to the Southern Field

26. Referencing Petition Appendix A, Site Plan C103, what is the width of the existing farm road at the wetland culvert crossing? What is the width of the proposed solar array access road at this location?

The existing farm road at the wetland crossing is approximately twenty-four (24) linear feet, with a proposed solar array access road width of fifteen (15) linear feet.

27. Referencing Petition p. 7, could the exclusive use of 670-watt panels reduce the solar array footprint? If yes, indicate the reduction in acreage.

No.

28. Referencing Petition p. 7:

a) How would the proposed tracker system be powered?

The tracker system will be DC powered. Each motor has a self-contained solar panel and battery that powers the motor throughout the day.

b) What is the lifespan of the tracker motors?

It is estimated that there is a minimum 30-year design life for all tracker components.

c) Do the tracker units have a snow accumulation sensor and the ability to tilt to shed snow?

No, snow will shed naturally as the trackers move.

29. Referencing Petition Appendix A, Site Plans C113 and C114 include knot wire and chain link fence detail. In what areas would each type of fencing be installed?

Greenskies anticipates that the final project design will employ agricultural fencing entirely around the perimeter of the array.

Energy Output

30. 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.

31. Referencing Petition p. 7, 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 output at the point of interconnection is 4.625 MW AC.

32. Will additional clearing be required to prevent or reduce solar array shading?

No.

33. 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?

Yes, localized sections can be isolated and shut down without harm to the rest of the system.

34. What is the projected annual capacity factor (expressed as a percentage) of the proposed facility?

The projected annual capacity factor of the proposed facility is 21%, which is based on AC capacity. This is based on: Capacity factor (%) = (production in kWh) / (system size kWdc * 8760) * (100).

Electrical Interconnection

35. Referencing Petition pp. 7-8, does the proposed facility interconnection require a review from ISO-NE? What was the result?

Yes, the project will be studied by the ISO as part of a transmission cluster study, which has not yet been finalized.

36. Referencing Petition pp. 7-8, what is the status of the Transmission Cluster Study and Facility Study?

Both studies are still pending with expected receival by the end of 2025 or early 2026.

37. What would be the approximate height of the proposed interconnection utility poles?

The Petitioner has not yet received specific design parameters for the height of the proposed utility poles, but anticipates that the height would be similar to those of the existing circuit along Gager Hill Road. Notwithstanding, the existing poles are estimated to be approximately 30 feet in height.

Public Health and Safety

38. Referencing Petition p. 10, 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?

The Petitioner’s monitoring systems do not automatically de-energize 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.

39. In the event of a shut-down, will the panels still produce and send power to the inverters? Can energized components pose a safety risk to emergency responders?

Yes, the panels would send power to the inverters, which would only pose a safety risk if personnel cut the wires connecting the panels, and combiner box to the inverters. If the system is shut down, the module-level conductors will still be energized. This could pose a safety risk to emergency responders, but it is mitigated through proper signage, education and training for first responders. Greenskies has prepared a draft Emergency Response Plan (ERP) provided as Exhibit B and will coordinate with the local fire department to ensure proper training and safety protocols are in place.

40. Are there manual facility shut-off switches that can be operated by emergency personnel? If yes, in what location(s)? Are the switches locked. If yes, how would emergency response personnel be able to operate the switch?

Yes. A gang operated air break switch is proposed on the utility pole connecting to the grid and a solar generator disconnect switch is proposed to be located on the equipment pads. Breakers are also proposed in the meter cabinets also on the equipment pad. The main shut-off switches are accessible within the site. If the main switch is inaccessible, the electricity can also be turned off on the utility side at the point of interconnection. This information will be included in the training of emergency responders.

41. 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 unlikely 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 shut down via the main switch. If the project main switch is not accessible, first responders can also turn off the electricity on the utility side at the point of interconnection. This information will be included during the training of emergency responders.

42. In the event of a brush fire between panel rows, how would fire equipment be able to access the area? What types of emergency vehicles can access the vegetated aisle area between the panel rows? If none, what is the minimum aisle width necessary to accommodate such vehicles?

In the unlikely 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. It is not recommended that emergency responders enter the areas between panel rows. This information will be included during the training of emergency responders.

43. Are there any sources of water for use by emergency responders within 0.5 mile of the site? If not, what alternative water sources are available to the fire department?

No. Water would need to be trucked to the site. However, it is GCE's understanding that the Scotland Fire Department uses a tanker truck with a total capacity of 3,000 gallons. For more information, please *see* https://www.firenews.org/ct/s/scotland/scotlandct.html.

44. Describe response procedures for both a brush fire and an electrical component fire at the site.

Please see Exhibit B for a draft ERP. If the project is approved, GCE will work with Scotland Town Officials and GCE's contractors to finalize a site-specific ERP.

45. In the event of a brush fire, what components of the solar array could catch fire (e.g. panels, conduit, wiring)?

In the unlikely event of a brush fire, all components of a solar array are at risk. While racking systems are typically steel or aluminum heat still represents a structural risk. All other electrical components could catch fire including panels, wiring, inverters, and anything non-metallic.

46. Will facility maintenance vehicles be equipped with fire extinguishers? Who ensures maintenance personnel follow emergency response procedures?

Yes, every technician vehicle is equipped with fire extinguishers and GCE ensures that all technicians follow our safety protocols.

47. With regard to emergency response:

a. Is outreach and/or training necessary for local emergency responders in the event of a fire or other emergency at the site?

GCE will reach out to local emergency responders to provide training in the event of a fire or other emergency on site.

b. 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.

c. In the event of a brush or electrical fire, how would GCE mitigate potential electric hazards that could be encountered by emergency response personnel?

Please see Exhibit B for a draft ERP. If the project is approved, GCE will work with Scotland Town Officials and GCE's contractors to finalize a site-specific ERP.

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

Yes, through the proposed disconnects referred to in Responses 38 and 40.

48. 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.

Please see Exhibit B for a draft ERP. If the project is approved, GCE will work with Scotland Town Officials and GCE's contractors to finalize a site-specific ERP.

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

The Connecticut State Fire Prevention Code includes the following text regarding solar PV ground mounted systems.

> 11.12.1 General.
>
> 11.12.1.1 Ground mounted photovoltaic systems shall be designed and installed in accordance with this section.
>
> 11.12.1.2 Electrical portions of ground mounted photovoltaic systems shall be designed and installed in accordance with NFPA 70.
>
> 11.12.1.3 Permits. Permits shall be in accordance with Section 1.12.8 of this Code.
>
> 11.12 1.4 Clearances. A clear area of 10 ft. (3048 mm) around ground-mounted photovoltaic installations shall be maintained.
>
> 11.12.1.5 Vegetation Management Plan. A vegetation management plan or noncombustible base acceptable to the AHJ shall be approved and maintained under and around the installation where required by the AHJ.

Greenskies confirms that all the above requirements will be met. Section 1.12.8 is the list of activities requiring fire marshal permits. PV is not listed by name, but this section authorizes the local fire marshal to require a permit where applicable. Some towns do require fire marshal review for PV installations and Greenskies will work with the Fire Marshal as requested.

50. Referencing Petition Appendix K, what is the name, distance and direction of the nearest federally-obligated airport from the site? Would construction at the site require the use of a crane that exceeds 15 feet in height? If yes, would a Federal Aviation Administration filing be required for such use?

The nearest known federally obligated airport is approximately 33.6 miles to the northeast of the project site (Theodore Francis Green Memorial State Airport (PVD)). The nearest airport that is not federally obligated is Windham Airport (IJD), which is approximately 5.3 miles to the northwest of the project site. The Notice Criteria Tool was run with a crane up to 199 feet above ground and was found to not exceed Notice Criteria. Any cranes required for construction will be less than 199 feet in height.

51. Would the facility have lightning protection? If yes, describe. In not, could lighting strikes cause electrical fires and damage facility equipment?

No, the facility will not have lightning protection. The PV system will be grounded in compliance with the National Electrical Code and PV installation best practices, which do not require a lightning protection system for this type of facility, as proper grounding is the most effective protection against lightning risks.

52. How does the proposed facility 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 of 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.

53. Referencing Petition Appendix L, Figure 3, a small icon shows the locations as "residences" in the area of the site. Does the icon show other structures bedsides "residences" on the figure, such as barns and other outbuildings? Where is the nearest residential structure to the sound producing equipment?

The icon indicates approximated locations for structures including barns and/or other outbuildings noted within abutting properties. The nearest residential structure to the sound producing equipment within the Southern Field is approximately sixty-hundred fifty (650) linear feet, and within the Central Field is approximately nine hundred forty-five (945) linear feet.

54. 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 a 7-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 the Card Street 11F Substation located via circuit 11F13 feeder, a facility owned and operated by Eversource Energy.
  - 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

55. Referencing Petition p. 15, during the March 26, 2025 meeting, how were DEEP's concerns regarding stormwater controls, fencing, and visual and noise impacts addressed? Please describe any recommendations, comments or concerns about the facility that were discussed.

A pre-application meeting was held with Petitioner, Petitioner's consultant, and DEEP division leaders to discuss design development requirements and supporting documentation. The stormwater design development process included considerations from DEEP, including but not limited to Stormwater Management controls in accordance with the Construction General Permit Appendix I for Solar Array Development, visual screening for neighbors to reduce public concern, a gap on the bottom of the perimeter fencing for the movement of wildlife, conducting a noise study to confirm compliance with local and state noise limitations, and scheduling a meeting with

Laschone Garrison for a site visit after Siting Council submission. Based on conversations with neighbors and the Town, GCE is proposing vegetative screening along the eastern side of the southern array to mitigate potential visibility from Gager Hill Road and along the southern portion of the southern array to mitigate visibility from 54 Gager Hill Road. In addition, GCE conducted a noise study, which found that sound levels at the two nearest abutting property lines ranged from 26 dB(A) to 47 dB(A) at Receiver A and from 25 dB(A) to 47 dB(A) at Receiver B. These levels are well below the applicable standards, including the daytime limit of 61 dB(A) and the nighttime limit of 51 dB(A) with an added 5 dB(A) penalty for potential tonal noise.

Further, a Stormwater Pollution Control Plan and supporting documentation, including Erosion and Sedimentation Controls, a Stormwater Management Report, and design calculations, were submitted on behalf of Petitioner in September 2025 to the DEEP ezFile system in support an Application for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. The application was approved on December 8, 2025, and GCE is in the process of providing the Letter of Credit to DEEP.

56. 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?

Yes, GCE submitted an application for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities to DEEP in September of 2025. The application was approved on December 8, 2025, and GCE is in the process of providing the related Letter of Credit.

57. Pursuant to DEEP General Permit Section 3 (b) (15), is the construction limit of disturbance within 100 feet of any Cold Water Habitat?

According to DEEP's Cold Water Stream Habitat Map, the project will not create any disturbance within 100 feet of a cold water site.

58. Referencing Petition Appendix J, p. 4, do the areas marked as "Potential Panel Visibility" include any residences? If yes, provide the distance/direction, and address of the residences.

The viewshed analysis in Appendix J, Page 4 indicates potential PV panel visibility from the following residential properties:

1. 91 Huntington Road, Scotland, Connecticut (1,230 feet north of the nearest PV array);
2. 75 Huntington Road, Scotland, Connecticut (1,300 feet northeast of the nearest PV array);
3. 54 Gager Hill Road, Scotland, Connecticut (616 feet northeast of the nearest PV array); and
4. 94 Gager Hill Road, Scotland, Connecticut (285 feet south of the nearest PV array).

However, as stated on Page 2 of Appendix J, the viewshed analysis is conservative in that it considers clearing of small hedgerows and tree stands that may allow for seasonal visibility. In reality, these conservative assumptions may ignore proposed screening features. For example, in the case of 91 Huntington Road, up to three narrow hedgerows would cumulatively screen the proposed PV array. There is a high likelihood that due to the PV array distance (1,230 feet) and the cumulative screening provided by both hedgerows and landscape vegetation, the PV array will be minimally visible regardless of the season (leaf-on or leaf-off). Similarly, 75 Huntington Road is screened by up to four hedgerows, so the viewshed analysis results are also likely to be overstated for these residences.

In the case of 54 Gager Hill Road, the viewshed analysis indicates a very small corridor of potential visibility that extends from the Project, up the road corridor and onto a residential property (visibility does not reach the actual residence). In this case, a combination of conservative vegetation clearing assumptions, and the minimal visibility indicated suggests that the viewer may only have visibility of a very small portion of the PV array from a very small portion of the property.

In the opinion of the visualization consultant, visibility from these three residential properties (91 Huntington Road, 75 Huntington Road, 54 Gager Hill Road) would not require any additional screening or mitigation due to the minimal visibility and distance from the PV arrays, as these locations would not likely experience any visual impacts as a result of the proposed PV array.

From 94 Gager Hill road, visibility of the PV array is likely. In this instance the Petitioner is proposing to install landscape mitigation. As illustrated in Appendix J, Attachment B, the photosimulations demonstrate that the proposed landscape mitigation will effectively reduce and minimize visibility of the proposed PV arrays.

59. Referencing Petition p. 20, have there been further discussions regarding screening? If yes, submit revised site plan(s). If not, what type of landscaping is proposed within the vegetative screening areas shown on Site Plans C104 - C107?

Greenskies anticipates using a mix of fast-growing arborvitae evergreen species with dense screening characteristics, though final species selections have not been finalized. Discussions related to potential screening for the residence at 119 Huntington Road are ongoing, and a visual simulation is currently being scheduled to inform any future considerations.

60. Referencing Petition Site Plan C114, what is the mesh size of the proposed perimeter fence? Is the mesh size variable or uniform? What mesh sizes or fence styles reduce the likelihood of large animal entrapment, such as deer?

Agricultural style fencing comes in various mesh sizes, and the style proposed has uniform 6x6” gaps. Fencing around a solar array must be at least 7 feet tall per NEC standards. This proposed fence is routinely used by GCE and is not anticipated to entrap large animals.

61. What is the reason 8-foot tall fencing was selected over 7-foot-tall fencing? Would 8-foot fencing increase the risk of large animal entrapment?

The initial 8-foot fencing specification was an error, and GCE hereby corrects the record to propose a 7-foot fence.

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

The nearest publicly accessible recreational area is Harry and Margaret Bowers Recreational Field, which is located at 233 Devotion Road, Windham, CT 06280. It is approximately 0.4 miles to the southeast of the project site and the proposed facility is not anticipated to be visible from that location.

63. Where is the nearest scenic road from the proposed site? Describe the visibility of the proposed facility from the nearby scenic road(s)

According to the Connecticut Department of Transportation "Connecticut Scenic Roads" App, the nearest scenic road to the proposed site is Huntington Road, which is approximately 0.2 miles north of the project site. The proposed facility is not anticipated to be visible from that road. Please *see* Exhibit C for the Visual Assessment, which depicts only a very small section of Huntington Road as having "potential PV panel visibility."

64. Referencing Petition Appendix M, p. 5, does GCE intend to increase the percentage of pollinator-friendly species within the seed mix?

GCE does not anticipate increasing the percentage of pollinator-friendly species within the seed mix, but could consider alternative mixes, so long as the mix stabilizes grasses from a stormwater perspective.

65. Referencing Petition Appendix M p. 7, the lowest point of the solar modules will be raised higher than is needed to support agricultural activities.

a. What would be the minimum height of the leading edge of the modules above grade to support energy production if there were no planned agricultural activities at the site?

The minimum height of the modules required to support energy production is approximately 18 inches feet above grade.

b. What is the estimated additional cost (as a percentage) associated with raising the panels above the minimum height required for energy production?

GCE cannot accurately estimate the added cost at this time. The cost increase will depend on thickness of the steel in the post based on soil type, corrosivity of soils, foundation needs, snow loads, and wind loads. However, cost increases are proportional to added length. Thus, an increase in height of one foot may be in the range of a 10 % increase assuming a 10-foot post length.

66. 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 Photographic Site Documentation, including a photographic log and map is provided as Exhibit D with aerial imagery depicting the location and direction of each photograph.

Facility Construction

67. Will blasting be required to develop the site or stormwater features? If not, how will bedrock be removed if encountered?

No, blasting will not be required. If bedrock is encountered during racking pile installation, predrilling will occur. The proposed project does not require depths that will necessitate the removal of bedrock.

68. What is the estimate of cut and fill. If there is excess cut, where would it be disposed of?

Approximately 1,150 cubic yards will be cut, in addition to fill of 2,090 cubic yards, resulting in a net fill of 940 cubic yards. The cut/fill analysis accounted for the subgrade preparation of the 8-inch-thick proposed gravel access roadway, with this import volume excluded from the net fill.

Proposed earthwork is limited to grading of the proposed gravel access road, concrete equipment pad area, and associated stormwater management system components. The proposed project includes maintaining existing topography to the best extent possible in order to achieve pre-development drainage areas and flow paths.

69. If erosion control blankets are used to stabilize disturbed areas, can net-less or 100 percent natural fiber erosion control blankets be specified to reduce the potential for wildlife entanglement?

Yes, Greenskies can use either natural fiber or netless erosions control blankets. The pre-construction site protection sequencing on Appendix A, Page C102 of the refers to the use of a "biodegradable erosion control blanket without monofilament mesh is an acceptable alternative." Prior to construction, the Petitioner's primary contractor will be required to provide shop drawing submittals, including but not limited to erosion control blankets.

70. 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 per day depending on the stage of construction. The highest number of 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.

Facility Maintenance

71. Would the transformers and tracker motors last the life of the facility? If not, at what time interval would this equipment need to be replaced?

Transformers and tracker motors are anticipated to last for the life of the facility.

72. Referencing Appendix C - Operations and Maintenance Plan, could GCE include an annual maintenance plan for the replacement of dead or dying landscaping for the life of the facility?

Yes.

73. Could the Operations and Maintenance Plan for the proposed facility include a periodic perimeter fence inspection for damage, trapped wildlife, etc.?

Greenskies conducts regular fence inspections for damage.

Decommissioning

74. 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.

75. Referencing Petition Appendix D, does the lease agreement with the host parcel owner specify any type of final land cover and/or soil restoration once decommissioning is complete? What specific ground cover will be used?

The lease agreement does not specify a final type of land cover or state of soil restoration. Greenskies will coordinate with the landowner to determine the final ground cover.

76. Referencing Petition Appendix D, the first paragraph of the Decommissioning Plan references Town of Durham officials. Clarify.

This reference was a scrivener's error and should state the Town of Scotland, not Durham.

77. Has the manufacturer of the proposed solar panels conducted Toxicity Characteristic Leaching Procedure (TCLP) testing to determine if the panels would be characterized as hazardous waste at the time of disposal under current regulatory criteria? If so, submit information that indicates the proposed solar modules would not be characterized as hazardous waste. If not, would the Petitioner agree to install solar panels that are not classified as hazardous waste through TCLP testing.

GCE has not yet finalized the modules for this project and does not have in its possession testing for the QCell modules proposed at the time of filing. Petitioner can submit TCLP testing for the proposed modules when they are finalized. 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.