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March 2, 2026

Via Electronic Mail and Hand Delivery

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

Re: **Petition No. 1696 – Terryville Solar One, LLC Petition for a Declaratory Ruling for the Proposed Construction, Maintenance and Operation of a 0.975 MW AC Solar Photovoltaic Electric Generating Facility at 270 Preston Road in Plymouth, Connecticut**

Dear Attorney Bachman:

On behalf of Terryville Solar One, LLC, enclosed please find the original and fifteen (15) copies of the Petitioner's responses to the Council's Interrogatories for Petition No. 1696. An electronic copy of the responses was also sent to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Kenneth C. Baldwin

Enclosure

Copy to:
Service List

34067537-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
A PETITION OF TERRYVILLE SOLAR ONE, LLC FOR A DECLARATORY RULING FOR THE PROPOSED CONSTRUCTION, MAINTENANCE AND OPERATION OF A 0.975 MW AC SOLAR PHOTOVOLTAIC ELECTRIC GENERATING FACILITY AT 270 PRESTON ROAD, PLYMOUTH, CONNECTICUT	:	PETITION NO. 1696
	:	MARCH 2, 2026

RESPONSES OF TERRYVILLE SOLAR ONE, LLC
TO CONNECTICUT SITING COUNCIL INTERROGATORIES

On February 9, 2026, the Connecticut Siting Council ("Council") issued Interrogatories to Terryville Solar One, LLC ("Petitioner"), relating to Petition No. 1696. Below are the Petitioner's responses.

Notice

Question No. 1

Referencing Petition pp. 13-15 and Appendix F, has Terryville Solar One, LLC (TSO) directly received any comments since the petition was submitted to the Council? If yes, summarize the comments and how these comments were addressed.

Response

TSO has not received any comments directly from the Town. TSO is aware that the Council did receive comments from the Town, included in its request for Intervenor Status asking the Council to consider the local ordinances and regulations and proper screening of the proposed facility. TSO is also aware of several comment letters filed by local residents in opposition to the project. The comments from area residents focused generally on visual effects,

noise, stormwater impacts, public safety, and impacts on property values.

Question No. 2

Referencing Petition Appendix F, of the certified letters sent to abutting property owners, how many certified mail receipts were received to date? Which abutting property owners did not acknowledge receipt of the certified mailing? Describe any additional attempts to notify these property owners.

Response

The notifications were sent by Certificate of Mailing. None of the notice letters were returned as undeliverable. Therefore, the Petitioner believes that all letters were delivered to their intended recipients.

Question No. 3

Referencing Petition Figure 4 on p. 16 and Appendix F, are 4 Lassy Court and 11 Lassy Court abutting properties to the proposed facility site? What is the use of these properties?

Response

4 Lassy Court and 11 Lassy Court are properties located on the opposite side of Preston Road from the TSO site and are zoned industrial. The property at 11 Lassy Court appears to be occupied by a business called "Reach for the Stars Academy of Dance". Based on an internet search, it appears that the industrial building constructed at 4 Lassy Court is currently vacant but may be in the process of soliciting and securing tenants for the facility.

Question No. 4

Referencing Petition pp. 13-15, please submit the following:

a. Town meeting minutes for the public meetings and hearings that were held related to the proposed solar facility;

b. A copy of Steven Trinkaus' review comments that were received on July 9, 2025;

c. The initial site plan presented to the Town and each revision made to the initial site plan; and

d. A map identifying the location of where solar panels were proposed to be located prior to the reduction in the foot print of the solar facility.

Response

a. See Exhibits A1 – A6.

b. See Exhibit B.

c. The initial submission to the Town was made on April 6, 2025. A total of (4) revised site plans were sent to the Town during its review process (see Exhibits C1-C5). A summary of the changes from the initial site plan are as follows:

- 2nd Iteration (June 9, 2025)

  Addition of a 2' wide by 2' deep stone trench with a 6" perforated pipe abutting the residential properties to the west to direct runoff into a catch basin in Preston Road and away from residences. Changes were made due to concerns over existing drainage issues from abutters during the public hearing.

- 3rd Iteration (June 11, 2025)

  Modification of the stone trench to be 2' wide by 3' deep and include a 12" perforated pipe

- 4th Iteration (Jun 24, 2025)

  Addition of an earthen berm adjacent to the stone trench and dispersal of inverters to reduce potential for noise impacts to

abutting residences to the west. Changes were made in response to concerns raised during a scheduled site walk with the Planning & Zoning Commission and abutters.

- 5th Iteration (July 23, 2025)

  Addition of an earthen berm along the eastern property line, a yard drain at the SE property corner, and a stormwater management basin in the SW property corner. Additional modifications were made to solar panel layout. Changes were made in response to the 3rd party technical review comments received on July 9, 2025.

d. An overlay map has been prepared and included in Exhibit D to these responses.

Public Benefit

Question No. 5

Referencing Petition page 3, when is the contractual in-service date for the facility?

Response

The contractual in-service date for the solar facility is July 22, 2027.

Question No. 6

If the facility operates beyond the terms of the Non-residential Renewable Energy Solutions (NRES) contract, will TSO decommission the facility or seek other revenue mechanisms for the power produced by the facility?

Response

TSO may seek additional revenue mechanisms at the conclusion of the NRES contract to continue operation of the facility if such mechanisms are available and if the property owner is

agreeable to a lease extension. If this cannot be accomplished, TSO will decommission the facility.

Question No. 7

Referencing Petition p. 7, would Eversource Energy (Eversource) purchase the capacity and renewable energy certificates (RECs) for the facility?

Response

Pursuant to the NRES Tariff, Eversource will buy all Energy, RECs, and Environmental Attributes produced by the facility.

Facility Development

Question No. 8

If the facility is approved, identify all permits necessary for construction and operation.

Response

If the facility is approved, the following permits will be necessary for construction and operation:

a. Connecticut Department of Energy and Environmental Protection, General Permit for the Discharge of Stormwater and Dewatering Wastewater from Construction Activity.
b. Town of Plymouth, Building Permit.
c. Town of Plymouth, Electrical Permit.

Question No. 9

What is the estimated cost of the proposed facility? Does this cost include any necessary upgrades to the electric distribution system beyond the interconnection point? How are costs recovered?

Response

The estimated cost of the project is between $2.5M to $3M. These costs will include upgrades to the electric distribution system. Project costs are recovered from the revenue received through the NRES contract.

Question No. 10

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?

Response

No.

Question No. 11

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

Response

No.

Question No. 12

Referencing Petition p. 4, were other potential sites examined? If yes, please provide a list of sites and reasons these sites were rejected.

Response

Multiple sites around Connecticut are examined based on a variety of factors including, but not limited to, interconnection, site constraints, and landowner willingness.

Question No. 13

If TSO transfers the facility to another entity, would TSO provide the Council with a

written agreement as to the entity responsible for any outstanding conditions of the Declaratory Ruling and quarterly assessment charges under CGS §16-50v(b)(2) that may be associated with this facility, including contact information for the individual acting on behalf of the transferee?

Response

Yes. If the Petitioner chooses to transfer the facility, it would do so subject to a requirement that the transferee comply with all regulatory permits and approvals in place at the time of transfer. Contact information for the new ownership entity would also be provided to the Council.

Proposed Site

Question No. 14

Is the site located within an Environmental Justice Community?

Response

Yes, according to the Connecticut DEEP and DECD websites, the Town of Plymouth is considered an Environmental Justice Community.

Question No. 15

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.

Response

A redacted copy of the lease agreement is being provided herewith as Exhibit E.

Question No. 16

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

Response

The initial term of the lease agreement is 20 years with the option of up to 3 additional extensions of 5 years each, at TSO's sole discretion.

Question No. 17

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.

Response

The current lease agreement does not expressly address agricultural co-uses associated with the project. However, the lease agreement with the property owner permits the Petitioner to use the leased premises for the placement of a solar array and any lawful purpose during the lease term.

Question No. 18

Referencing Petition p. 12, please describe and/or provide any provisions in the lease agreement related to decommissioning or site restoration at the end of the facility's useful life.

Response

The lease agreement contains provisions that require the Petitioner, upon expiration or termination of lease, to remove, at its expense, all fixtures and equipment and restore the property to substantially the same condition that existed on the commencement date of the lease.

Question No. 19

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?

Response

Yes, the Property is currently a part of Connecticut's Public Act 490 Program. It is possible that once construction is completed, that portion of the parcel that contains the solar facility may no longer be eligible for farm, forest or open space classification under Public Act 490 Program. For more information, please refer to: https://portal.ct.gov/DOAG/Commissioner/Commissioner/Public-Act-490---The-Basics.

If the Petition is approved by the Council, TSO will meet with the Town of Plymouth Assessor to determine how the Town will treat the facility for tax purposes.

Question No. 20

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

Response

No, the State of Connecticut Department of Agriculture has not purchased the development rights for any portion of the Property.

Question No. 21

Provide the distance, direction and address of the nearest property line and nearest off-site residence that is not owned by the host parcel owner from the solar field perimeter fence.

Response

The nearest residential property line and off-site residence to the solar field perimeter fence is 258 Preston Road, located to the west. The property line is approximately 32 feet west from the fence at the closest point and the residential structure is approximately 86 feet southwest from the fence at the closest point.

Question No. 22

Referencing Petition p. 7 and Appendix B, Sheet 2.11, what is the total length of the existing paved driveway and new gravel access drive proposed for the site?

Response

The existing paved portion of the driveway is approximately 25 feet long and the new gravel access drive proposed for the site is approximately 610 feet long, for a total length of approximately 635 feet.

Question No. 23

Referencing Petition Appendix B, could the proposed access road and stormwater basin be relocated further from the southwestern property line? Explain.

Response

The Petitioner investigated this suggestion and found that a nominal shift of the access drive (approximately 5 feet to the east) and a slight reconfiguration of the stormwater basin grading could provide an additional 10-foot separation between the property line and the stormwater basin. This potential design change is indicated in Exhibit F.

Proposed Facility and Associated Equipment

Question No. 24

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

Response

Exact dimensions of the transformer and switchgear are still pending based on final engineering, selection, and procurement of this equipment. However, based on the anticipated selection of equipment, as indicated in Appendix A of the Petition, the transformer would be

approximately 6 feet high by 5.5 feet wide by 5 feet deep. The proposed switchgear would be approximately 6.5 feet high by 3.5 feet wide by 2 feet deep.

Question No. 25

What is the height above grade of the inverter/racking system?

Response

The inverters will be mounted approximately 6 feet above grade on the racking system.

Question No. 26

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

Response

Most of the wiring will be run on the racking system itself. Where wiring is not run on the racking, it would run inside protective conduit. All facility wires are weatherproof and rated up to 194° F.

Question No. 27

Referencing Petition p. 7, What is the length (in feet) of the proposed gravel access route?

Response

The proposed gravel access route is approximately 640 feet in length, inclusive of access to the equipment pad area.

Question No. 28

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?

Response

As indicated on sheet 2.11 of the Appendix B "Project Plans" the aisle width is 12.8 feet. CTDEEP Appendix I stormwater regulations require aisle width to be greater than panel row width. The indicated aisle width represents the minimum required to meet that standard and reduce interrow shading.

Question No. 29

Provide the distance, direction and address of the nearest residential property line and nearest residence from the solar field perimeter fence that is not owned by the host parcel owner.

Response

The nearest residential property line and off-site residence to the solar field perimeter fence is located at 258 Preston Road, to the west. The property line is approximately 32 feet west from the proposed fence at its closest point. The residential structure is approximately 86 feet southwest of the fence at its closest point.

Energy Output

Question No. 30

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

Response

TSO will not participate in the ISO-NE Forward Capacity Auction, as the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource") owns the capacity rights of any NRES program facility. However, at the conclusion of the NRES tariff, TSO may choose to participate in the ISO-NE Forward Capacity Auction or a similar capacity program available at that time.

Question No. 31

Referencing Petition p. 7 and Appendix F, the 0.975 MW AC system will generate enough electricity to power 229 homes in its first year of operation. Is this based on when the facility is operating at full power, or does it include other times when the facility produces no power or reduced power?

Response

This figure is based on typical production anticipated over the first calendar year and includes the system operating at the complete range from full power at peak times power to no power at night.

Question No. 32

Have electrical loss assumptions been factored into the output of the facility? What is the output (MW AC) at the point of interconnection?

Response

Yes, electrical loss assumptions have been factored into the output of the facility. The output at the point of interconnection is estimated to be 0.964 kW AC, when factoring in losses.

Question No. 33

Referencing Petition Appendix B, Sheet 2.61, could the relocated evergreen trees that are to be transplanted along the southwest side of the proposed site create any solar array shading? Explain.

Response

A shading analysis was performed and any possible shading by the relocated evergreen trees is considered in the production model.

Question No. 34

If one section of the solar array experiences electrical problems causing the section to shut down, could other sections of the system still operate and transmit power to the grid?

Response

Yes, only the DC panels or DC to AC inverters for the affected area would shut down. The remaining portion of the system would continue to operate and generate power.

Electrical Interconnection

Question No. 35

Referencing Petition pp. 7-8, what is the cost of the upgrade to the electric distribution system to add the new overhead service?

Response

Eversource has indicated a cost of approximately $400,000 to upgrade the distribution system and add the new overhead service.

Question No. 36

Referencing Petition p. 8, will the interconnection provide energy to a substation? If yes, identify the name of the substation and distance from the interconnection to the substation.

Response

The facility provides energy to the Eversource managed distribution system. The Petitioner cannot determine if this energy is utilized by facilities on the distribution system or if energy can reach the nearest substation and no such determination is expressed by Eversource in the results of the impact study that was completed. However, given that the study indicated no adverse impact to any Eversource substation, it can be inferred that it is unlikely that energy produced by the facility would reach the substation. In the unlikely event energy is transmitted

back to the substation, Eversource mapping indicates the interconnecting 2B5 circuit connects to the Thomaston substation located approximately 2.8 miles southwest of the point of interconnection.

Question No. 37

Referencing Petition p. 8, describe what construction payments are due under the Interconnection Agreement. How many payments has TSO made? Is TSO still making payments?

Response

The Interconnection Agreement breaks up the construction costs into three payments of 20%, 40%, and 40% of the total cost. TSO has made the initial 20% payment and will be making the remaining payments in the coming months.

Question No. 38

Referencing Petition p. 8, are there provisions of the NRES contract and/or Interconnection Agreement related to obtaining regulatory approvals? What are the consequences if approvals cannot be obtained?

Response

There are no provisions in either the NRES contract or Interconnection Agreement that are tied to other regulatory approvals.

Question No. 39

Provide the line voltage of the proposed electrical interconnection.

Response

13.2 kV

Question No. 40

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

Response

It is approximately 168 feet from the interconnection point to the facility equipment pad.

Question No. 41

Referencing Appendix B, Sheet C-2.11, please provide the electrical plans referenced in the Site Layout Plan.

Response

The electrical plans are included herewith as Exhibit G.

Question No. 42

Referencing Petition p. 8, of the seven electrical interconnection poles, how many would be TSO-owned and how many would be Eversource-owned and what equipment would be located on the respective poles? Could the number of poles be reduced (ex. by consolidating equipment)?

Response

The Petitioner recently learned that Eversource will need three poles, not four as originally indicated, and therefore a total of six poles, not seven, are proposed. Eversource's first pole will be the tap pole for interconnection to the grid, the second Eversource pole will have the recloser & RTAC (Real-Time-Automation-Control) devices, and the third Eversource pole will have the primary billing meter. The three TSO-owned poles will contain a GOAB (Gang Operated Air Break) disconnect switch, a customer meter, and a customer recloser. These devices cannot be installed on the same pole and therefore that is not an option for reducing the number of poles.

Question No. 43

Referencing Petition Appendix B, Sheet C-2.11, 5 utility poles are depicted along the gravel access drive and one utility pole is depicted along Preston Road as the proposed interconnection point. Where is the 7th utility pole referenced on Petition p. 8 located on Sheet C-2.11?

Response

Per the response to No. 42, the correct number of proposed poles is six, not seven, and sheet C-2.11 accurately depicts this.

Question No. 44

Referencing Petition p. 8 and Appendix B, provide the height above grade of the proposed utility poles.

Response

The poles will be 40-45 feet above grade.

Question No. 45

Referencing Petition Appendix B, Sheet C-2.11, what is the distance of the underground electrical connection from the equipment pad to the point of transition to an overhead configuration?

Response

It is approximately 48 feet from the equipment pad to the overhead configuration.

Question No. 46

Referencing Petition p. 8, was an ISO-NE study or approval required for the interconnection? If so, provide the status of such studies and/or approvals.

Response

An ISO-NE study or approval was not required for the interconnection.

Public Health and Safety

Question No. 47

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

Response

Yes.

Question No. 48

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

Response

The facility will have a maintained vegetative surface beneath the panels, maintained grass access paths in and around the panels, and a gravel access road leading from the point of interconnection to the equipment pad area, and along the majority of the western edge of the array, as requested by the Plymouth Fire Marshall. In addition, the facility will incorporate any measures required by the local Fire Marshall during building and electrical permit review, including , but not limited to, the installation of a "knox box" to ensure unrestricted access for first responders.

Question No. 49

How does the facility comply with industry Best Management Practices for Electric and Magnetic Fields at solar facilities? Would the site design conform to these practices.

Response

The Petitioner is not aware of any industry Best Management Practices for Electric and Magnetic Fields at solar facilities that connect to the existing distribution system such as the TSO project. We would also like to direct the Council to the report provided by Exponent that addressed this concern for the similar Burlington Solar One project. That report indicates that there were no EMF concerns for that project as a solar facility is not expected to increase the magnetic-field level outside the range typical of distribution lines. The Burlington Solar One project was approved by the Council and is currently in service (see Docket No. 497, Petition No. 1437, https://portal.ct.gov/CSC/1_Applications-and-Other-Pending-Matters/Applications/3_DocketNos400s/Docket-No-497---Burlington-Solar-One).

Question No. 50

Referencing Petition p. 30, would notice to the FAA be necessary for the temporary use of a crane during construction? If a crane is used, what would be the crane height needed to install site equipment?

Response

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

Question No. 51

Referencing Petition Appendix D, where are the facility shut-off switches that can be operated by emergency personnel located?

Response

The facility shutoff switches are located both at the equipment pad area and the first

customer installed pole that is adjacent to the Eversource installed interconnection poles. The shutoff switch on the pole is locked in the closed position with a lock that can be removed by emergency personnel to operate that switch. The switch located in the equipment pad area is not locked.

Question No. 52

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

Response

The facility is engineering with all the proper grounding equipment, such as grounding rings and a grounding transformer, per the applicable electrical code, to absorb electrical surges such as from lightning strikes.

Question No. 53

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?

Response

During a shut-down, the panels still produce DC energy and the wires to the inverters will be live. The appropriate signage and education will be provided to the emergency responders.

Question No. 54

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?

Response

Yes, there are manual facility shut-off switches that can be operated by emergency

personnel. The manual shutoff switches are located both at the equipment pad area and the first customer installed pole that is adjacent to the Eversource installed interconnection poles. The shutoff switch on the pole is locked in the closed position with a lock that can be removed by emergency personnel to operate that switch. The switch located in the equipment pad area is not locked. Access to the equipment pad area will be provided to emergency responders through the installation of a "knox box" device.

Question No. 55

In the event of a brush or electrical fire, how are potential electric hazards that could be encountered by emergency response personnel mitigated? What type of media and/or specialized equipment would be necessary to extinguish a solar panel/electrical component fire?

Response

In the event of any type of fire, any potential electrical hazards are mitigated by the operation of the manual disconnect switches or remotely shutting down the system. The Petitioner is not aware of any specific media and/or specialized equipment that is needed to extinguish a fire within a solar facility.

Question No. 56

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

Response

Emergency Response Plan that is being provided herewith, are as follows:

1. Ensure Personal Safety:
    - Move everyone on site to a safe distance (at least 300 feet)
2. Notify Authorities:

- Call 911 and report a fire at the facility
- Contact the facility Emergency Coordinator

3. Shut Down Facility (if qualified and safe to do so):
    - Engage emergency shutoff switches
    - Follow Lockout/Tagout (LOTO) procedures
4. Fire Suppression Measures:
    - Local Fire Department will perform fire suppression measures in accordance with department policies and procedures.
    - Local Fire Department will have the knowledge of the water supply locations for fighting fires.
5. Support Emergency Personnel as needed
6. Post-Incident Actions:
    - Conduct a damage assessment
    - Notify utility company if equipment is compromised

Question No. 57

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

Response

In the event of a brush fire, it is possible for components such as the wiring insulation and conduit to catch fire, depending on the intensity of the flames. It is far less likely that the panels would catch fire, as those materials are less combustible at temperatures from a typical brush fire.

Question No. 58

Will facility maintenance vehicles be equipped with fire extinguishers?

Response

Yes.

Question No. 59

What is the distance of the nearest municipal fire hydrant to the proposed facility? What alternative water sources are available to the fire department? How would water be brought to the site in the event of a fire?

Response

The nearest municipal hydrant is located on Lassy Court approximately 320 feet south from the entrance to the site from Preston Road. An alternative source of water may be available where the Pequabuck River intersects Preston Road, approximately 400 feet east of the site entrance. The Petitioner anticipates that emergency services would either utilize the nearby hydrant or choose to utilize tanker and/or pumper trucks, if that is their preference, to bring water to the site in the event of a fire.

Question No. 60

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?
b. How would site access be ensured for emergency responders?
c. In the event of a brush or electrical fire, how would TSO mitigate potential electric hazards that could be encountered by emergency response personnel?
d. Could the entire facility be shut down and de-energized in the event of a fire? If

so, how?

Response

a. The Petitioner will provide training to local emergency responders. It would be up to the Town of Plymouth Fire Department to determine if training is "necessary".
b. Emergency responders will access the facility through the main gated entrance using the "knox box" that will be provided.
c. In the event of any type of fire, any potential electrical hazards are mitigated by the operation of the manual disconnect switches or remotely shutting down the system.
d. The facility can be shut down and de-energized in the event of a fire by operating the pole mounted disconnect switch.

Question No. 61

Provide an Emergency Response Plan for the proposed facility. 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.

Response

The requested Emergency Response Plan has been incorporated into the Operations and Maintenance Plans and is attached as Exhibit H.

Question No. 62

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 and contact

information signs be located on the fence? Where?

Response

The facility will be secured physically by the surrounding minimum 7-foot-high fence and locked access gates. Additionally, the facility will be remotely monitored and if there are issues with equipment on site the operations team is alerted. The remote monitoring and control of the facility is maintained through secure communication protocols that will employ available industry acceptable protective measures. Warning signs will be placed on the perimeter fence, spaced approximately 50 feet apart. A contact information sign will be placed at the facility entrance gate.

Environmental Effects and Mitigation Measures

Question No. 63

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

Response

The transformers will utilize FR3 fluid which is derived from over 95% renewable vegetable oil and is non-toxic. The transformers do not have an oil containment system. The transformers will have liquid level gauges that will be monitored through the facility monitoring platform.

Question No. 64

Referencing Petition p. 11, what is the status of the General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities from DEEP?

Response

Per an email from Chris Stone of the CTDEEP Stormwater Division on December 10, 2025, review of the General Permit was completed and was ready for approval for this project, pending the Petitioner providing the required letters of credit. Since the Petitioner was not in a position at that time to post the required letters of credit, Mr. Stone advised that the application be resubmitted at the start of the new year via the new online portal that CTDEEP was switching over to. The Petitioner then reapplied on 1/13/26. In a 2/19/26 conversation with Mr. Stone, he confirmed that the resubmission was received and is being reviewed with design re-approval still pending at this time. As there was no change to the stormwater design from the prior submission that was due to receive approval and the current submission, the Petitioner anticipates that preliminary design approval will be issued again, with a final approval letter being issued upon the Petitioner providing the required letters of credit. A copy of the 10/10/25 email from Chris Stone is attached herewith as Exhibit I.

Question No. 65

Referencing Petition Appendix B, Sheet 2.21, are interrow check dams for post construction flow planned for the east side of the site? Why or why not?

Response

As discussed in our response to Question No. 64 above, the design as currently constituted was considered to be in a position to be approved by CTDEEP without the implementation of interrow check dams. If, in its final determination, CTDEEP indicates the addition of interrow check dams are necessary, the Petitioner will add them to the design plans.

Question No. 66

Referencing Petition Appendix B, Sheet 2.21, why does the yard drain discharge at the

stormwater basin? Could the yard drain be designed as a stormwater basin? Explain.

Response

The contributing drainage area to the yard drain is well under one acre and does not necessitate the construction of a second stormwater basin. The current proposed stormwater basin has been sized to accommodate the flows from the yard drain.

Question No. 67

Referencing Petition p. 9 and Appendix B, Sheet 2.21, a berm is referenced. What is the height of the berm? Why does the berm extend along the entire east side of the facility site?

Response

The referenced berm is one-foot tall. The berm along the eastern property line was designed to help direct runoff towards the yard drain. The berm on the western side of the property was added in response to concerns raised during a Planning & Zoning site walk as an added measure to ensure runoff would enter the proposed stone trench/perforated pipe and in turn alleviate existing drainage issues to the residences to the west.

Question No. 68

Referencing Petition Appendix B, Sheet 2.31, define silt fence with "wings."

Response

The silt fence wings described are 10 feet long "V-shaped" portions of silt fence that are meant to section off one-acre or less of untreated runoff. These silt fence wings are meant to be used in lieu of sediment traps/basins or any other treatment BMPs during construction to minimize earthwork for temporary measures.

Question No. 69

Referencing Petition Appendix B, Sheet 2.61, describe how the removal of the existing

120 evergreens on the northeast portion of the site could affect stormwater drainage toward the off-site watercourse located to the northeast.

Response

The relocation of the existing evergreen trees is not anticipated to impact drainage to the off-site watercourse. An approximate 200 to250 foot wooded buffer will still exist between the property and the off-site watercourse.

Question No. 70

Referencing p. 24 and Petition Appendix B, the Pequabuck River is located approximately 40-feet to the northeast of the site. Does the Pequabuck River contain any Cold Water Stream Habitat?

Response

According to the CT DEEP's official Cold Water Habitat Map, the proposed project is located approximately 750 feet east of the closest mapped Cold Water Site associated with the Pequabuck River.

Question No. 71

Referencing Petition p. 7, what is the mesh size of the proposed perimeter fence? Is the mesh size variable or uniform? What mesh sizes or fence styles and NEC-compliant fence heights reduce the likelihood of large animal entrapment, such as deer?

Response

The fence will most likely have a variable mesh size that will be larger at the bottom and smaller at the top from approximately 3"x3" to 2"x2" mesh size. This proposed mesh size and the proposed seven-foot height are NEC-compliant and those specifications are not conducive to the entrapment of large animals such as deer.

Question No. 72

Referencing Petition p. 26, how many acres of the 2.24 on-site acres of Prime Farmland Soils would be impacted by the proposed facility?

Response

The project area shown in Figure 6 was incorrect and has been updated accordingly. There are approximately 3.13 acres of prime farmland on-site, of which approximately 2.77 acres will be occupied by the proposed facility. A full set of revised figures have been provided which reference the correct project area. See Exhibits J1-J7.

Question No. 73

What is the length of the posts and to what depth would the posts be driven into the ground to provide structural stability? Are any impacts to groundwater quality anticipated? If so, how would TSO manage and/or mitigate these impacts?

Response

The final structural design of the racking system will be developed upon selection of the racking vendor and their review of the results of the geotechnical study. However, we can state that typically, the posts extend approximately 7-8 feet above grade & in the range of approximately 6 feet to 10 feet below grade depending on foundation type. TSO does not anticipate impacts to groundwater quality from this activity.

Question No. 74

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).

Response

A Remote Field Review has been prepared and included with these responses as Exhibit K.

Facility Construction

Question No. 75

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

Response

Based on the geotechnical study that was conducted, it is unlikely that bedrock will be encountered during construction of the site or stormwater features. If bedrock is encountered, it would be during installation of some of the posts to support the racking for the solar array. In those instances, limited line drilling to enable the posts to reach proper depths may be required. No blasting will be required.

Question No. 76

Approximately how many vehicles would be expected to enter the site during construction and where would they park?

Response

During construction, the number of vehicles visiting the site will vary depending on the amount of activity ongoing but during working hours will generally vary from as little as five to as many as fifteen. The vehicles would likely park in the open area to the east of the proposed access drive, between the proposed fence line for the array and Preston Road.

Question No. 77

Referencing Petition Appendix B, Sheet 2.61, what is the estimate of cut and fill. Where would excess cut be disposed of?

Response

The proposed grading results in a net cut of approximately 231 cubic yards of material. The excess material can be spread on-site in a manner that maintains existing drainage patterns.

Question No. 78

The Petition Site Plans refer to the use of erosion control blankets. Can net-less or 100 percent natural fiber erosion control blankets be specified to reduce the potential for wildlife

entanglement?

Response

The Petitioner has utilized traditional mesh erosion control blankets in all the sites previously constructed and has never encountered the issue of wildlife entanglement. Therefore, Petitioner respectfully requests to continue utilizing traditional erosion control blanket but would be willing to specify net-less or 100 percent natural fiber as an alternative that would be required if wildlife entanglement becomes an issue.

Question No. 79

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

Response

A geotechnical study was performed, and it was determined that the subsurface conditions support development of the facility with the subsurface conditions consisting of till. The report provided options for the structure of the facility such as driven piles or ground screws.

Question No. 80

Referencing Petition Appendix B, Sheet 2.11, who is responsible for repairing the existing sidewalk and what repairs would be required?

Response

It is assumed that the Petitioner is responsible for repairing or replacing the section of sidewalk that would be affected by the construction of the pipe connection, in accordance with the applicable town standard detail.

Question No. 81

Referencing Petition Appendix B, Sheet 2.21, does TSO have the right and/or approval to connect to the Town catch basin?

Response

During the previous discussions with local officials, the Petitioner received mapping information from the Director of Public Works at that time, Carl Johnson, for the purpose of connecting a pipe to discharge drainage from the on-site drainage system to the town's drainage system. During these local reviews, Mr. Johnson did not indicate any objection or opposition to the proposed connection. Since receiving this interrogatory question from the Council, the Petitioner reached out to the new DPW Director for the Town of Plymouth to inquire if there is a formal process for requesting and being granted permission to make the proposed connection. To date, the Petitioner has not received a response from the DPW Director, but will continue to pursue an answer, and will follow up by providing the Council with any additional information received from any future response.

Facility Maintenance

Question No. 82

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

Response

No replacement modules will be stored on-site. Damaged panels can be detected through routine visual inspection, thermal imagery from the use of a drone, and remote monitoring of the system's production levels.

Question No. 83

Referencing Petition p. 9 and Appendix B, Sheet 2.21, how would TSO keep the perforated pipe and yard drain clear from debris?

Response

The following maintenance measures will be implemented for the stone trench/perforated pipe:

- Inspect after major storms (1 inch or more of precipitation) in the first few months following construction.
- Inspect the trench annually.
- Remove trash and organic debris (leaves) in the Spring and Fall.
- Remove sediment from the trench surface when the sediment accumulation exceeds 2 inches or when drawdown time exceeds 48 hours after the end of a storm event, indicating that the system is clogged.

The following maintenance measures will be implemented for yard drains:

- Over the span of the first year of a new installation, visually inspect each basin every two months or after two storm events once the site has stabilized.
- Check for obstructions and debris at the openings of the grate and remove as needed.
- After cleaning the surface of the grate, remove the grate from the frame.
- Once the grate is removed from the frame, check for obstructions and debris inside the basin (including the sump and inlet and outlet pipes) and clean out as needed.
- A vacuum truck is best for the removal of debris when necessary. After the collection of the debris, it shall be disposed of according to the local environment requirements.
- After the maintenance or inspection of the structure completed, set the grate back in

the frame so it sits flush and does not rock.

- Once the monitoring period is over, it is best to continually schedule maintenance based on the amount of debris or sediment that accumulates over time.

Question No. 84

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

Response

Yes, TSO could include an annual maintenance plan for the replacement of dead or dying landscaping for the life of the facility. This has been incorporated into the updated Operations, Maintenance, & Emergency Response Plan that is included in Exhibit H.

Question No. 85

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

Response

Yes, the O&M Plan can include periodic fence inspection for damage, trapped wildlife, litter, and/or any other related concerns. This has been incorporated into the updated Operations, Maintenance, & Emergency Response Plan that is included in Exhibit H.