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June 2, 2026

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

Re: Greenskies Clean Energy LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §§ 4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4.999-megawatt AC solar photovoltaic electric generating facility located on Schoolhouse Road in Ellington, Connecticut

Dear Ms. Bachman:

I am writing on behalf of my client, Greenskies Clean Energy LLC, which is submitting the enclosed petition for a facility to be located at the above-referenced location in Ellington, Connecticut. With this letter, I am enclosing the original and fifteen copies of the Petition, including Appendices A-N. I am also enclosing a check for \$625.00, made payable to the Connecticut Siting Council.

Electronic copies of the filing are available for download at the following link:
<https://pullcom.sharefile.com/d-s25d3b8f0e4494b20bc880e8bc3d2d4a4>.

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


Sincerely,

Lee D. Hoffman

Enclosures

cc: Town Clerk, via electronic mail, Town of Ellington, Connecticut, townclerk@ellington-ct.gov

ACTIVE/81669.18/KEBOUCHER/21113350v1



Greenskies Clean Energy LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §§ 4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4.999-megawatt AC solar photovoltaic electric generating facility located on Schoolhouse Road in Ellington, Connecticut

**Prepared for
The Connecticut Siting Council**

June 2, 2026

1.0 Introduction

This is a Petition for a declaratory ruling, pursuant to Connecticut General Statutes §§ 4-176 and 16-50k, that no Certificate of Environmental Compatibility and Public Need (“Certificate”) is required for the development, construction, operation and maintenance of a solar photovoltaic (“PV”) project (the “Project”) proposed by Greenskies Clean Energy LLC (“GCE” or “Petitioner”). The Project consists of the development of a 4.999-megawatt (“MW”) alternating current (“AC”) ground-mounted solar PV system (“Facility”) located on Schoolhouse Road in Ellington, CT (“Property”). See Figure 1 – Site Location Map and Figure 2 – Proposed Project Areas Aerial.

GCE submitted the Project in response to a renewable energy request for proposal (“RFP”) and it was selected in that RFP process. The 4.999-MW solar array was selected in the Shared Clean Energy Facility (“SCEF”) Program. The Facility has been designated as Project #SCEF5 - 8766. This Project will promote increased generation from renewable energy resources and diversification of the State’s renewable energy portfolio. The Tariff Terms Agreement Approval Date or In-Service Date for this Project is October 30, 2027.

Authorization by the Connecticut Siting Council (“Council”) via this Petition would allow Petitioner to construct the Project and assist the State of Connecticut in achieving its goal of energy conservation and sustainability. Pending approvals, the Project will commence financing, detailed engineering, procurement, and construction efforts in 2026 and 2027, with commercial operation planned for the entire Project in 2027.

The Project is located on one parcel within the Town of Ellington Rural Agricultural Residential (RAR) zoning district and is comprised of approximately 21.5 acres (“Project Area”) on an approximately 74.6-acre site. See Figure 3 – Zoning Map. The Town of Ellington Assessor’s Office has the parcel listed as 146 007 0000. The parcel is currently owned by Kenyon Shores and Kimberly Howden-Shores. See Figure 4 – Tax Parcel Map and Figure 5 – Existing Conditions Map.

2.0 Petitioner

GCE is a limited liability company headquartered at 127 Washington Avenue, North Haven, Connecticut 06473. Founded in 2009, GCE is a renewable energy company that originates, develops, constructs, finances, owns, and operates distributed generation renewable energy facilities throughout the United States. GCE specializes in commercial and industrial (“C&I”), utility-scale, and public sector solar projects serving large corporations, commercial real estate owners, utilities, municipalities, and other public entities. Through its integrated development and long-term ownership model, GCE manages projects throughout the full project lifecycle, from origination and design through construction, operation, and maintenance. To date, GCE has developed and constructed more than 395 MWdc of renewable energy facilities across more than 710 projects in 19 states.

GCE is owned by JLC Infrastructure and Hull Street Energy. GCE has developed projects for national commercial clients, including Fortune 500 companies such as Target Corporation,

Lowe’s Companies, Inc., Walmart Inc., and Amazon.com, Inc. Projects developed for these clients represent more than 190 MWdc across over 345 installations in 18 states. GCE currently owns and operates approximately 190 MWdc of renewable energy facilities across over 280 projects nationwide.

GCE has significant experience developing, constructing, owning, operating, and maintaining solar photovoltaic (“PV”) facilities throughout Connecticut. Since its founding, GCE has completed more than 100 MWdc of renewable energy projects across more than 200 projects located in 68 Connecticut municipalities, including more than 60 MWdc of ground-mounted and landfill solar PV facilities across more than 30 projects. Representative Connecticut ground-mounted PV facilities include the 18.68 MWdc Waterford facility completed in 2023, the 6.14 MWdc North Haven facility completed in 2020, the 6.11 MWdc North Stonington facility completed in 2021, the 6.09 MWdc Stonington facility completed in 2021, and the 3.75 MWdc Winchester facility completed in 2026. Representative landfill solar PV facilities include the 1.34 MWdc Fairfield facility completed in 2017, the 1.17 MWdc East Haven facility completed in 2021, and the 1.15 MWdc West Haven facility completed in 2025.

As a long-term owner and operator of renewable energy assets, GCE maintains in-house capabilities spanning project development, engineering, construction management, asset management, operations, and maintenance. GCE oversees project performance throughout the operational life of its facilities through ongoing monitoring, preventative maintenance, and operational management programs designed to support safe, reliable, and efficient system performance.

Correspondence and communications regarding this Petition should be addressed to the following individuals:

<p>Jean-Paul LaMarche VP Project Development Emilie Cohen Project Developer Greenskies Clean Energy LLC 127 Washington Ave West Building, Garden Level North Haven, CT 06473 jean-paul.lamarche@greenskies.com emilie.cohen@greenskies.com</p>	<p>Lee D. Hoffman Kathryn E. Boucher Liana Feinn Pullman & Comley, LLC 90 State House Square Hartford, CT 06103-3702 lhoffman@pullcom.com keboucher@pullcom.com lfeinn@pullcom.com (860) 424-4300</p>
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3.0 Proposed Project

3.1 Project Area Overview

As noted above, the Project is located on one parcel that is approximately 74.6 acres at Schoolhouse Road, Ellington, Connecticut. The proposed Project would allow the landowner to keep the land in the family as he retires and discontinues orchard operations, while still making use of the land.

3.1.1 Existing Site Land Use

The 74.6-acre Property consists primarily of an open, agricultural field surrounded by forest and wetlands. A man-made freshwater pond and pumphouse also exists in the southwestern section of the site for crop irrigation purposes. The Project Area is sited within the open portion of the Property to avoid adverse impacts to natural resources. A gravel road extends from Schoolhouse Road near the southwestern edge of the Project Area. Access to the Project Area will be via a new access road from Schoolhouse Road. Construction, maintenance, and all other activities related to the Project will use the access road. See Figure 5 – Existing Conditions Map.

According to the Town of Ellington’s Zoning Map, the land use of the parcels that comprise the Project Area is Rural Agricultural Residential (“RAR”). The RAR zone of Ellington is characterized as a low-density area with lots that are 40,000 square feet or greater. This zone permits ground mounted solar arrays as a primary use, subject to Special Permit and Site Plan approval from the town commission.

3.1.2 Surrounding Land Use

The Town of Ellington is characterized by its predominantly rural and agricultural character, with a landscape consisting of active farmland, forested areas, open space, small local businesses, and low-density residential development. Much of the town is zoned RAR, a sparse suburban/rural district primarily composed of farms, forests, rural businesses, and single-family residences. The Project site is surrounded by woodlands and a few nearby homes and is located approximately 2.5 miles northeast of the start of Commercial and Industrial zones of Ellington. Based on the DEEP “Connecticut Environmental Justice Communities” Map, this site location in the Town of Ellington is not considered either within the “Environmental Justice Block Group 2024” or an “Environmental Justice Distressed Community 2025.”

3.1.3 Project Area Alternatives

The Project Area was selected by GCE because it is suitable for a solar PV project and construction of the Project would have minimal natural resources and environmental impacts. The Project as designed will not have adverse effects on quality forested areas, agricultural land, or wetlands, and the Project will not diminish the quality of life of those who live in the vicinity. It was also important to GCE to select a site that allows interconnection of the generation facility to a feeder and substation of the utility company that is compatible with its grid and goal of better serving customers. The proposed Project Area allows for interconnection to the Eversource distribution grid at a cost that is viable and avoids any negative impacts to the electrical grid. Every attempt is made to minimize adverse effects of development on the land.

GCE conducted an extensive search of both public and private land, resulting in the selection of the Property. GCE uses third party consultants combined with site visits, thorough internal analysis and minimal impact requirements, and review of public data for environmental classifications/hazards to understand the biological, environmental, historical, and archeological impacts of solar development on selected sites. While all development has an impact on the area and community, the social and environmental impacts of this Project are a net positive.

3.2 Project Description

3.2.1 Site Access

The primary access point to the Project will be via Schoolhouse Road in the southeast corner of the site. The majority of the existing gravel/dirt driveways onsite will be removed, and a 15-foot-wide gravel driveway will provide access to the array areas. The existing gravel driveway providing site access from Schoolhouse Road will be relocated further east on Schoolhouse Road and away from the onsite wetland area. The proposed gravel roadway would provide access throughout the array. Petitioner proposes the construction of the roadway on prepared subgrades with a gravel topping which would match existing grades to the greatest extent feasible. See Figure 6 – Proposed Project Layout and Appendix A – Permit Plan Drawing Set - Overall.

3.2.2 Solar Facility Design and Layout

It is currently anticipated that the Project will consist of PV arrays to be comprised of 535-watt and 545-watt panels (depending on the state of module technology at the time of construction) arranged in a single-axis tracker layout. The panels will be located in the best available area within the Property while avoiding the region closest to the neighbors in order to minimize their view of the Project, as well as avoiding wetland buffers and environmentally sensitive areas. The proposed location also maximizes annual energy production while balancing environmentally responsible design. The panels will be mounted on steel racking with driven posts to a depth to attain sufficient structural capacity to resist the loads from the weight of the panels, as well as environmental loads including snow, wind, and seismic forces.

The current PV array on the electrical site plan has a nameplate capacity of 4.999 MW AC and is designed with 320 strings of 26 LONGI HI-MO5 LR5-72HBD (535W) modules and 106 strings of 26 LONGI HI-MO5 LR5-72HBD (545W) modules, for a total of 11,076 modules. There will be 40 125 kW inverters that are to be centralized within the array and adjacent to the racking structure. The DC capacity is 5.953 MW and the AC capacity is 4.999 MW. The DC to AC ratio is 1.19. The power from the inverters will be directed to a transformer, meter, disconnects and switchgear prior to interconnecting with the utility distribution feeder. The power will interconnect to the pole to the southeast of the access road at Schoolhouse Road.

3.2.3 Electrical Interconnection

The interconnection application for the solar array was submitted to Eversource on October 31, 2024. The proposed Project will interconnect with the SCITICO 27H Substation located via circuit 27H12 feeder. Based on conversations with Eversource, approximately 1-2 miles of existing single-phase feeder will be upgraded to three-phase distribution. The point of interconnection will be south of the access road on Schoolhouse Road.

In August 2025, Eversource kicked off a combined feasibility study for two projects (Ellington East and Ellington West). These projects had a combined output of 9750 kWAC and shared POI. Eversource's preliminary findings of both projects indicated substantial distribution line upgrades. By decreasing the output size to 4999 kWAC (solely Ellington West), the required upgrades were substantially minimized. An Impact Study for the new Project size is expected to be underway by June 2026. The project is included in the ISO-NE Transmission Cluster Study, which is anticipated to be completed in Q4 of 2026. Eversource may also require a Facility Study, which would begin by August 2026 and is expected to be complete in Q4 2026. Petitioner anticipates it will receive an Interconnection Agreement Q1 of 2027.

3.2.4 Fencing and Site Security

Petitioner proposes a chain link security fence. The 7-foot-high chain link security fence would be installed around the perimeter of the solar array fields to provide site security, as well as to address National Electric Code requirements. There would be one (1) 20-foot-wide double swing access gate at the entrance of the array with locking hardware, proposed along the perimeter for access to the arrays and permanent stormwater infrastructure. See Appendix A – Sheet C113 and C114- Fence Details.

3.3 Construction Schedule and Phasing of Construction

Project construction is anticipated to begin in Spring/Summer 2027 pending regulatory approvals. Initial work would involve the installation of erosion and sediment control measures, including installation of sediment traps. It is currently anticipated that a temporary staging area would be centrally located within the Project Area pending future selection and consultation with an EPC contractor. Formal construction notice to proceed would be anticipated in Spring/Summer 2027, with delivery of equipment likely commencing in Summer 2027. As each discrete area of installation is completed, the ground surface will be stabilized, and best management practices will remain in place until final stabilization occurs.

Final installation of array equipment and landscaping/screening measures would be anticipated in Fall of 2027. Final site stabilization, testing, and commissioning would be expected to be completed in the late Fall of 2027. Construction activities would be expected to occur Monday through Saturday between the hours of 7:00 a.m. and 5:00 p.m. Notice will be provided to the Council in the event that Saturday work is planned. A draft construction sequencing schedule is included in Sheet C-103 in Appendix A.

The Construction Sequence for the Project begins by defining a weekly qualified inspector, emergency contact, and tentative schedule of all inspections, as well as holding a pre-construction meeting with representation from the general contractor, site contractor, Connecticut Department of Energy and Environmental Protection (“CTDEEP”), Town of Ellington, the engineer of record, and the qualified inspector. The contractor will contact Call-Before-You-Dig and notify the Town of Ellington at least 48 hours prior to commencement of any construction activity. Upon achieving completion of construction and final site stabilization, the engineer of record would investigate the site, and all temporary erosion controls would then be removed.

Prior to construction, a health and safety plan would be finalized by the contractor and would address not only the specific characteristics of the Project Area and the Project but also will reflect the nature of the surrounding land uses. A Storm Water Pollution Control Plan would also be finalized and implemented by GCE under the direction and assistance of the Engineer of Record, that will include regular inspection of erosion control measures to prevent sedimentation or water quality impact. The Stormwater Management Report (Appendix E) provides Erosion and Sedimentation Control Best Management Practices – Maintenance/Evaluation Checklists for Construction Practices and Long-Term Practices.

Further details regarding Construction Sequencing and Scheduling are included within Sheet C103 in Appendix A.

3.4 Operation and Maintenance

GCE has a dedicated Operations & Maintenance (“O&M”) team responsible for monitoring and maintaining operational assets throughout its portfolio. Following construction and commissioning, GCE would oversee the long-term operation, maintenance, and performance of the Project through a combination of in-house personnel, remote monitoring systems, operational analytics, and established maintenance procedures.

The Project would be monitored through GCE’s remote monitoring systems, which collect and report system performance data on an ongoing basis. Monitoring systems and alarm notification protocols would be utilized to track system performance, identify potential issues, and support safe and reliable facility operations. Operational personnel would evaluate system performance trends, respond to system alerts, coordinate corrective maintenance activities, and support ongoing system optimization throughout the operational life of the Project.

GCE utilizes preventative maintenance and corrective maintenance programs designed to support the safe, reliable, and efficient operation of its renewable energy facilities. Maintenance activities include routine inspections, equipment testing, system diagnostics, monitoring system validation, and manufacturer-recommended maintenance procedures. Corrective maintenance response protocols are prioritized based on operational urgency and system performance needs.

As a long-term owner and operator of renewable energy assets, GCE maintains in-house capabilities spanning asset management, operations, maintenance, and operational oversight. GCE’s asset management and O&M teams currently oversee a national portfolio of operating renewable energy facilities, including projects located throughout Connecticut. See Appendix C – Operations & Maintenance Plan.

3.5 Decommissioning

At the end of the Project life, decommissioning would include disassembly and removal of above-ground structures, removal of subsurface structures, and re-grading and restoration of disturbed areas. Where reasonably required, restoration would include regrading, seeding, and mulching to establish vegetation and prevent soil loss and erosion. While 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.

Racking posts pulled from the ground are expected to create minimal ground disturbance. Any disturbed areas will be seeded with the same seed mix used across the site during the life of the Project or, if the landowner prefers, another acceptable mix would be selected.

At the time of decommissioning, the Project owner would submit to the Town of Ellington and the Council a request plan for continued beneficial use of any components to be left on site, as requested, and determined by the landowner, such as gravel roads, landscaping and/or visual screening and stormwater buffers.

Under the proposed decommissioning plan, the Project owner would be responsible for all decommissioning costs. Any additional permits or approvals required for decommissioning, removal, and legal disposal of Project components would be obtained before decommissioning activities begin. All activities would be conducted in accordance with all permits and applicable rules and regulations. Disposal of all solid and hazardous waste would be conducted in accordance with local, state, and federal waste disposal regulations.

Facility Materials/Equipment

PV facilities are constructed using the same basic materials and methods of installation common to their application. Materials include.

Metals: Steel from pier foundations, racking, conduits, electrical enclosures, fencing; aluminum from racking, module frames, electrical wire, and transformers; stainless steel from fasteners, electrical enclosures, and racking; copper from electrical wire, transformers, and inverters.

Concrete: Equipment pads and footings.

PV modules: PV Modules are typically constructed of glass front sheets (some use glass back sheets as well), plastic back sheets and laminates, semiconductor rigid silicon cells, internal electrical conductors (aluminum or copper), silver solder, plus a variety of micro materials. The semiconductor PV cell materials represent a very small part of a PV module's weight, between 1 and 2%. As manufacturers pursue lower-cost modules, thinner layers of semiconductor materials are used which reduces this percentage. The most commonly used semiconductor material for the construction of PV modules is silicon. Glass, aluminum, and copper are easily recyclable materials, and silicon can be recycled by specialty electronics recyclers.

Glass: Most PV modules are approximately 80% glass by weight.

Plastics: A limited quantity of plastic materials are used in PV systems due to a system's continuous exposure to the elements and long operational lifetime. Plastics typically are found in PV facilities as wire insulation, electrical enclosures, control and monitoring equipment, and inverter components.

Sequence of Decommissioning

The following sequence for the removal of the components will be used:

PV Site:

- Disconnect PV facility from the utility power grid;
- Disconnect all aboveground wirings, cables and electrical interconnections and recycle offsite by an approved recycling facility;
- Remove concrete foundations. Electric components and their foundations will be removed and recycled off-site by a concrete recycler;
- Remove PV modules and transport to recycling facilities for recycling and material reuse;
- Remove the perimeter fence and recycle off-site by an approved metal recycler; and
- Remove all waste.

Inverters/Transformers:

- Disconnect all electrical equipment;
- Remove all on-site inverters, transformers, meters, fans, and other electrical components and recycle off-site by an approved recycler; and
- Remove all waste.

Access Road:

- The access road built for the Project and associated drainage infrastructure will remain as a means to access the site in the future and facilitate stormwater management, if landowners choose to maintain it.

4.0 Project Benefits and Needs

The Project is anticipated to provide multiple benefits to the Town of Ellington, the State of Connecticut, and the rest of New England. As the Council is aware, the State of Connecticut aims to meet specific clean energy goals that this Project helps support. Solar projects supply renewable energy that helps reduce greenhouse gas emissions, support regional habitat conservation, promote energy independence, and further a robust and reliable grid.

High levels of greenhouse gas emissions have been linked to changes in the climate, as well as health risks for the population. The resulting climate change alters regional and nation-wide habitat and threatens our natural resources. The Project is able to produce energy in a way which produces significantly fewer greenhouse gases than fossil fuel generation over the course of the Project's lifetime. With fewer harmful emissions, this Project is also able to help mitigate the health risks people face by smog and similar poor air quality conditions. Further, leaving behind a need for fossil fuel generation directly corresponds to regional and national energy independence. Reducing the need to purchase fuel from foreign countries enables the United States to keep more financial capital within the country.

The Project's energy generation will also align with Connecticut's seasonal and time-of-day peak energy needs. Given that the Project will produce energy during the day when power is generally consumed, it is anticipated that it will have benefits that the Council has recognized pursuant to Conn. Gen. Stat. § 16-50p. The timing of this generation can help the grid support changes in the loading of the system and thus supports a more robust grid. ISO New England recently shared that distributed solar reduced the amount of electricity consumed by New Englanders in 2024 by

about 5%.¹ The ability of this solar Project to generate electricity in a de-centralized way means that the grid can support customers more reliably during day-to-day and emergency circumstances.

The Project has received an award with the State's SCEF Program. Pursuant to Conn. Gen. Stat. § 16-50p, a public benefit exists when a facility is necessary for the reliability of the electric power supply of the state or for the development of a competitive market for electricity. Special Session Public Act 05-1, An Act Concerning Energy Independence, portions of which were codified in the Public Utility Environmental Standards Act, established a rebuttable presumption that there is a public benefit for electric generating facilities selected in RFPs. Because it was selected in a competitive procurement, there is a clear public need for the Project.

5.0 State and Local Outreach/Input

GCE has been in communication with and has engaged state and local regulators regarding the design and development of the Project.

On January 6, 2026, GCE initiated communications with the Town of Ellington. Since that time, GCE has continued correspondence with Laurie Burstein, First Selectman; Lisa Houlihan, Town Planner; and Matthew Reed, Town Administrator. GCE met with Town officials on February 17, 2026, to introduce the Project. At that time, GCE was advancing two adjacent projects in Ellington—Ellington West and Ellington East—both located on properties owned by the same landowner. However, at this time, only Ellington West is moving forward, although Ellington East may move forward at a later time. Laurie Burstein, Lisa Houlihan, and Matthew Reed attended the meeting. During the discussion, Town officials asked questions regarding the location and size of the proposed arrays. Following the meeting, Lisa Houlihan requested clarification regarding the lease areas, which GCE subsequently provided in the form of an outlined overlay on the project design images. Ms. Houlihan also advised GCE that the Ellington Planning and Zoning Commission would review the drawing at its April 27, 2026 meeting; however, the matter was later tabled to the Commission's May 18, 2026 meeting. A follow-up email was sent on May 19, 2026, requesting additional details regarding the feedback discussed during this meeting. Lisa Houlihan sent a letter with the Commission's comments on May 20, 2026, which included concerns about satisfying the 200-foot buffer requirement, soundproofing, and building on land that was used for agriculture, even if not prime farmland. GCE responded that Ellington West's design complies with the required 200-foot buffer from all property lines, as reflected in the submitted drawings. Regarding soundproofing, GCE provided the noise study demonstrating compliance with applicable state regulations, requested clarification on any more stringent Town requirements, and offered to conduct a post-construction noise study using live receptors to verify compliance. No response from that email has been received yet. See Appendix I for a copy of this letter and email correspondence.

In early February 2026, GCE mailed introductory letters to 24 neighbors in close proximity to the adjacent Ellington West and Ellington East projects. The mailing included preliminary project designs for both sites, as well as contact information for Emilie Cohen, Project Developer, for any questions or concerns, and a proposed timeframe window to meet with

¹ <https://isonewswire.com/2025/07/09/solar-power-reduced-new-england-power-grid-demand-by-5-in-2024/>

interested parties. Following the mailing, a group of neighbors abutting the Ellington East project requested a meeting and provided a list of questions in advance. GCE met with these six individuals on Grassy Hill Road on February 27, 2026. During the meeting, GCE provided printed materials containing detailed responses to the questions submitted and addressed additional follow-up questions raised by attendees. Although GCE presented information on both projects, the neighbors' concerns primarily related to the Ellington East project. Documentation of this correspondence, including a summary of the February 27 meeting, is included in Appendix I – Public Outreach.

On February 9, 2026, GCE met with the CTDEEP Concierge team, including Robin Blum, Chris Stone, Eric Hammerling, Linda Brunza, Jordan DiDomenico, Laschone Garrison, and Jessica Bilyard. GCE addressed questions related to stormwater controls, the proximity of the Ellington West project to Ellington East and how the two are distinguished as separate projects, as well as noise and visual impacts. GCE also consulted with CTDEEP Wildlife Division for a Natural Diversity Database Review as articulated in greater detail in Section 6.11.1 Rare – Threatened, & Endangered Plants and Wildlife.

Following this review, American Kestrels were documented near or on the Project Site. GCE consulted with Tom Sayers, who has experience studying and protecting American Kestrels in Connecticut and is familiar with the project site, to identify opportunities to enhance habitat conditions. Based on his recommendations, GCE proposes to incorporate a pollinator seed mix beneath the array and implement a mowing schedule that maintains vegetation to a desirable level that allows kestrels to see their prey. Additional information is provided in Section 6.11.1 below.

6.0 Environmental Considerations

6.1 Site/Community Setting & Scenic Character & Values

The Project site consists of approximately 74.6 acres and is located on Schoolhouse Road. The Property has been actively used for peach and apple trees since the landowner cleared the land in 1993. As the landowners transition into retirement, they have chosen to pursue a solar energy project rather than sell or lease the property for residential development or more intensive uses such as off-road recreation. This approach allows them to remain on the land while generating a stable source of income. The use of solar panels will maintain the open character of the land by avoiding dense development and preserving its expansive nature.

The site is not located near any publicly used spaces, such as schools, parks, trails, or ballfields. The closest public space or park appears to be Crystal Lake Elementary School and associated fields approximately 1.2 miles to the southeast of the project parcel and Soap Stone Mountain Observation Tower approximately 1.2 miles to the northwest of the project parcel. The closest scenic road is Route 74 approximately 4 miles to the south of the project. The existing tree line surrounding the site will provide a large level of screening for homes around the Project parcel. Located in the northeastern corner of Ellington, the site is approximately three miles from the town's denser central areas to the southwest.

In addition, GCE reviewed the Town of Ellington zoning regulations to ensure reasonable compliance with their regulations for ground-mount primary-use solar installations. Per Article 7, Section 15.7 of the zoning regulations, “A ground-mounted solar array and any portion thereof shall be located at least 200’ from property lines and shall comply with the maximum lot coverage requirements for the zoning district in which it is located” and “Transformers and inverters shall be located 200’ or greater from all property lines and soundproofed.”² In accordance with these requirements, all solar panels, transformers, and inverters were sited a minimum of 200 feet from all property lines. While soundproofing is not defined, the modeled noise levels meet Connecticut noise levels without mitigation – See Appendix L – Noise Study. GCE is also in contact with neighbors and the Town of Ellington to address concerns about any potential impacts.

6.2 Public Health and Safety

The proposed Project is not expected to create any adverse impact with regard to public health or safety. The proposed Project will meet or exceed all local, state, national and industry health and safety standards and requirements. During construction and post-construction operations and maintenance, workers and personnel would follow all health and safety standards applicable to solar energy generating facilities.

A site-specific construction health and safety plan is typically developed prior to initiation of any on-site Project-related tasks. During the construction phase of development, all contractors, sub-contractors and personnel will be appropriately trained and briefed on any potential site health and safety issues. There will always be a designated construction manager and/or site safety officer or representative present during construction, and such individuals will be responsible for overseeing/implementing the site construction health and safety plan.

Construction traffic relative to the site includes standard construction trucks, small earth moving equipment, and all-terrain forklift equipment. Vehicle trips would be relative to scheduled deliveries of the major materials such as solar racking, solar panels, electrical equipment to serve the solar site, and fencing materials to be installed around the perimeter of the solar field. Potential pollutants that might be used on the site would include polyvinyl chloride (“PVC”) glue for use with electrical conduit installations and carbon-based fuels for vehicles and equipment. Petitioner anticipates that there will be less than one gallon of PVC glues, and less than 25 gallons of fuel stored on-site. Petitioner would keep all flammable liquids in code compliant cabinets and containers. Petitioner will also keep spill kits in all vehicles and equipment on-site. Petitioner will monitor chemical usage daily to ensure compliance with requirements. No risk of release to the environment is anticipated.

² Town of Ellington, Zoning Regulations Section 7.15.7, Page 88, *available at* https://resources.finalsite.net/images/v1775051561/ellingtonctgov/km2jjs4aptd0sxak9lpr/ZoningRegsw-cover_EFFECTIVE_04-01-2026.pdf.

6.3 Noise

6.3.1 Noise Level Guidelines and Regulatory Requirements

Potential Project-related noise is regulated by § 22a-69-2 of the Regulations of Connecticut State Agencies, which requires the Project to remain below the following sound levels: 61 dBA at the nearest residential property during the day (when the Project would be generating electricity); 51 dBA at the nearest residential property at night (when some accessory equipment may still be in operation); 66 dBA at the nearest commercial/educational property; and 70 dBA at the nearest agricultural/industrial property. The regulation also accounts for impulse and other types of noise. Construction noise is exempt from the regulation. The Town of Ellington does not quantify sound level limits for photovoltaic facilities but states the following requirement in Article 7 Special Regulations Section 7.15.7 Ground-Mounted Primary Use and Other – All Zones, Paragraph D: “Transformers and inverters shall be located 200 feet or greater from all property lines and soundproofed.”

6.3.2 Proposed Project-generated Noise

Due to the nature of the use, facility design, required equipment and distance from potential noise receptors, the proposed Project is expected to have no adverse noise-related impact on the surrounding area. Existing uses around the perimeter of the Project Area are residential, agricultural, and rural undeveloped land.

The selected inverter has an acoustic noise rating of 73 dBA at 1 meter distance and 67 dBA at 3 meters distance as noted in the inverter specification sheet provided in Appendix B. There are two equipment pads, Equipment Pad 1 is approximately 205 meters (674 feet) to the nearest property line and Equipment Pad 2 is approximately 196 meters (643 feet) to the nearest property line. Based on noise modeling completed for the Project, sound levels from expected daytime operation along the property line are a maximum of 42 dBA, which occurs at a location in the southwest. These sound levels are below the daytime criteria of 61 dBA and the nighttime criteria of 51 dBA with a 5 dBA penalty applied for the potential of tonal noise. The maximum sound level at the property line modeled for nighttime is 25 dBA, at the same location. A negligible amount of noise will be generated at night when the sun is not present and therefore this Project will abide by the 51 dBA sound requirement at nighttime. A copy of the report is included in Appendix L.

The nearest abutting property line to a noise generating equipment pad is located approximately 643 feet from the closest equipment pad. Since sound dissipates with distance, Petitioner does not anticipate that any Project-generated noise would be detectable by potential residential receptors and will be below regulated limits.

6.4 Air Quality

Because the Project is a solar energy generating facility, no air emissions will be generated during operations and, therefore, an air permit would not be required. Temporary, potential, construction-related mobile source emissions would include those associated with construction vehicles and equipment. Any potential air quality impacts related to construction activities can be considered *de minimis*. Such emissions would be mitigated using available measures including

limiting idling times of equipment; proper maintenance of all vehicles and equipment and watering/spraying to minimize dust and particulate releases. In addition, all on-site and off-road equipment would meet the latest standards for diesel emissions, as prescribed by the United States Environmental Protection Agency and, with the above mitigation measures, should reduce the exhaust emissions.

6.5 Visual Impact

A visibility assessment was conducted to identify areas where the proposed PV panels would be visible, and to illustrate the potential visual change resulting from the installation of the Project through the development of photo simulations. The digital surface model viewshed analysis was conducted which considered the height and location of all surface features. The results indicated that potential PV panel visibility would mostly occur within the Project Area due to dense forest vegetation. Visibility is limited to small areas of open land to the east and south, and parts of Schoolhouse Road. Overall, less than 0.5% of the 2-mile radius study area will have potential visibility of the panels. Refer to Appendix J - Visual Impact Assessment, Figure 1. Photo simulations from three representative viewpoints were developed to illustrate PV panel visibility. Refer to Attachment B of Appendix J for the photo simulations. The Petitioner has reached out to 24 neighboring property owners, as well as the Town of Ellington, to address any potential visual concerns related to the Site. To date, no comments or concerns have been raised regarding the visual impact on this project.

6.6 Federal Aviation Administration Determination

Petitioner used the Federal Aviation Administration (“FAA”) Notice Criteria Tool to screen the Project Area to assess if the Project triggers the FAA Notice Criteria. The result of the initial screening on July 29, 2025, is that this project is required to file notice with the FAA. On February 3, 2026 GCE filed notice with the FAA. The notice is still under review. The nearest federally obligated airport is Bradley International Airport (BDL), which is approximately 15 miles to the west of the site. See Appendix K - FAA Consultation and Notice Application.

6.7 Environmental Site Assessment/Conditions

A site investigation by a Licensed Environmental Professional from Verdantas investigated the Project Area for potential signs of contamination in October 2025. Verdantas performed a Phase I Environmental Site Assessment and prepared a report summarizing the findings. Verdantas concluded that no Recognized Environmental Conditions were identified on the site.

6.8 Site Soils and Geology

6.8.1 Existing Site Soils and Geology

Verdantas completed a cursory review of the Natural Resources Conservation Service (“NRCS”) Web Soil Survey soil mapping of the site. Based on available data, the site is comprised of 3 soil map units (see Table 1).

Table 1 Project Site Soil Map Units

Soil Map Unit Name/Map Unit Symbol	Hydrologic Soil Group
Woodbridge fine sandy loam, 0 to 8% slopes, very stony (46B)	C/D
Woodbridge fine sandy loam, 3 to 15% slopes, extremely stony (47C)	C/D
Sutton fine sandy loam, 0-8% slopes, very stony (51B)	B
Canton and Charlton fine sandy loams, 0 to 8% slopes, very stony (61B)	B
Paxton and Montauk fine sandy loams, 3-8 % slopes, very stony (85B)	C
Paxton and Montauk fine sandy loams, 8-15 % slopes, very stony (85C)	C

In order to confirm in-field characteristics, on May 14, 2025, Verdantas personnel completed a test pit program in accordance with CTDEEP Stormwater Quality Manual. A test pit (TP-1) was advanced to a depth of ten (10) feet below ground surface (bgs) at the location of the proposed infiltration basin by means of a mini-excavator.

The in-situ soil texture below the proposed infiltration basin was determined to be a gravelly fine sandy loam, consistent with the NRCS Web Soil Survey soil in that area (i.e., map unit 61B). Groundwater was not encountered.

The CTDEEP Stormwater Manual, Table 10-2, Default (Rawls) Infiltration Rates for Use as Design Infiltration with Static Method Sizing, details the infiltration rate for Sandy Loam (HSG B) as 1.02 in/hr. In accordance with the CTDEEP Stormwater Manual Chapter 10, the infiltration rate used for the stormwater management design near TP-1 was 1.02 in/hr. See Appendix A for Test Pit locations and Appendix B for the Soil Log within the Stormwater Management Report.

This site does not contain mapped prime farmland soils.

6.9 Historic and Archeological Resources

Heritage Consultants prepared a Phase 1A Cultural Resources Assessment Survey in July 2025. The assessment identified that approximately 60 acres of land within the Project Area that will be impacted by construction have a moderate sensitivity for archaeological resources. Based on the Phase 1A Survey, a Phase 1B study was recommended within approximately 20.3 acres of the Project Area and a 248-meter (790 foot) long access road/interconnection. In August 2026, Petitioner retained Heritage Consultants to conduct a Phase 1B shovel test. During the Phase 1B Survey, 37 post-European Contact period artifacts, including pieces of brick and glass shards, were recovered. These artifacts, found in low densities and disturbed soils, as well as the lack of associated above or below ground features, do not possess research potential and were classified as unassociated field scatter and deemed not eligible for listing on the National Register of Historic Places (NRHP).

Additionally, a single precontact era quartz flake was recovered and was deemed to have been redeposited during events of agricultural plowing. As a result, the isolated find was assessed as not eligible for listing on the NRHP.

The results of the Phase 1B study concluded that no additional archaeological examination is recommended prior to construction. A copy of the Phase 1A and Phase 1B report is included in Appendix F. In a letter dated September 8, 2025, the State Historic Preservation Office concurred that no historic properties will be affected by the proposed solar facility, and no additional archaeological investigation is warranted.

6.10 Wetlands and Watercourses

6.10.1 Wetlands Delineation and Methodology

In July 2025, soil scientists from Davidson Environmental investigated the site to determine if regulated Inland Wetlands or Watercourses were present. In Connecticut, Inland Wetlands are defined by areas of poorly drained or very poorly drained soils or alluvial soils of any drainage class. The investigation was facilitated using hand-drilled soil borings and hand dug test pits that were used to examine soil profiles and evaluate drainage classes. A Wetlands Delineation Report dated July 29, 2025, was prepared outlining the survey process and findings. A copy of this report is included in Appendix G.

6.10.2 Existing Wetlands and Watercourses

The wetland delineation concluded that wetlands were identified and delineated on the Project site, including a Palustrine forested wetland that encompasses the western and northeastern sides of the Property, and a manmade pond in the southwest portion of the Property that drains to the wetland via a culvert. The western wetland includes a series of braided intermittent watercourses that become the headwaters of Martin's Brook. Martin's Brook flows through the extreme northeast portion of the Project site and drains to the southeast.

The site features three wetlands, which are all hydrologically connected to form one large wetland system that weaves on and out of the Property boundary. The manmade pond located in the southwestern portion of the Project site that drains to the palustrine wetland on the west side of the Project site via a culvert. Wetland hydrology ranged from saturated to semi-permanently flooded, and vegetation was dominated by hydrophytic vegetation. Species observed included red maple (*Acer rubrum*), spicebush (*Lindera benzoin*), highbush blueberry (*Vaccinium corymbosum*), winterberry (*Illex verticillata*), skunk cabbage (*Symplocarpus foetidus*), and cinnamon fern (*Osmundastrum cinnamomeum*).

6.10.3 Vernal Pools

No habitat for vernal pools was discovered within the Project Area during the on-site field investigation in 2025 and wetland scientists from Davison Environmental have recommended that no further in-season surveys are required as part of the development.

6.10.4 Proposed Project & Mitigation

The Project has been designed to avoid direct impacts to wetlands. The design also includes maintaining a 50-foot undisturbed wetland buffer to minimize disturbance. Additionally, demolition and site preparation will include removal of the existing gravel/dirt driveways, culverts, and riprap and grassed swales. The removal of the gravel/dirt driveways will render the swales and culverts unnecessary; therefore, the swales will be filled, and the culverts will be removed. Grades will also be adjusted in these areas to redirect stormwater runoff to flow overland. These efforts will improve hydrology by promoting sheet flow and reducing concentrated flow, and thereby reducing flow velocities, and minimizing the potential for erosion and sedimentation.

Prior to construction, erosion and sediment control measures, such as silt fences and silt socks, will be installed to prevent sediment from entering the wetlands and stream. Additionally, the Project will implement a limit of construction to ensure construction activities do not encroach on protected areas. Vegetative buffers will be preserved and protect the integrity of the wetlands and stream during and after construction. These measures are designed to ensure that the natural habitats are preserved and that the environmental impact of the Project is minimized. The Project limits meet or exceed the CTDEEP Stormwater General Permit's minimum suggested setbacks for both solar panels (100') and overall disturbance (50') to wetlands with the exception of minor demolition and site preparation activities. While some of these activities will be in 50-foot buffer zone, this is only to accommodate removal of existing site features and inadequate existing stormwater management infrastructure, such as undersized culverts and swales, and the gravel/dirt driveways. These efforts will in fact provide a benefit to the wetlands as direct concentrated discharges of stormwater runoff via the culverts will be removed and the removal of swales and associated grading will promote natural sheet flow of stormwater runoff. Additionally, the proposed array and gravel driveways will be located further from the wetland areas than the existing gravel/dirt driveways and cultivation areas (to be removed), creating a greater buffer distance between the active areas of the Property and the wetlands. Overall, these improvements will improve stormwater management and water quality by reducing flow velocities, reducing erosion and sedimentation potential and will provide an enhanced buffer for wildlife and vegetation health.

6.11 Wildlife & Habitat (NDDB)

6.11.1 Rare, Threatened & Endangered Plants and Wildlife

A Request for NDDB State Listed Species Review was completed and submitted to CTDEEP Wildlife Division for review. In return, a Final Determination was issued on July 18, 2025, confirming that one Federal or State Endangered, Threatened or Special Concern, the American kestrel (*Falco sparverius*), has been documented within or in close proximity to the Project area. The Final Determination is included in Appendix H. A biologist skilled in kestrel identification and habitat from Davison Environmental conducted a formal breeding season for this species between April 22 and May 12, 2026. The purpose of the survey was to document kestrel sightings, potential nest trees, and nesting or foraging behavior in the project vicinity.

Three survey events were conducted during this period. During these surveys one individual kestrel sighting was documented on May 1, 2026, whereupon a single bird flew over the project site but did not land. The project area and bordering forest were characterized as low quality habitat. No nesting or potential natural nesting cavities were observed. There is a nest box installed by the property owner on the eastern project boundary that was unoccupied during the survey events. The box will be temporarily removed following the 2026 breeding season to avoid conflicts with construction, and reinstalled following construction. The kestrel report will be submitted to CT DEEP Wildlife Division for concurrence that the species are not present and breeding on site.

As stated previously, GCE is in communication with Tom Sayers, who has experience studying and protecting American Kestrels in Connecticut and is familiar with the project site, to identify opportunities to enhance habitat conditions post-construction.

6.11.2 Core Forest

A review of the CTDEEP Forestland Habitat Impact Map indicates no core forest exists within the project site.

6.12 Water Supply

No water for the construction of the Facility will be sourced on site from either a well or utility hook-up. All water used for construction will be trucked in. Minimal long-term water use will be required for operations for the purpose of cleaning modules, and this water will also be trucked in.

6.13 Stormwater Management

6.13.1 Existing Conditions

The existing Property is currently used as an orchard and contains open plowed fields and nursery area. The orchard and fields are connected by a network of dirt and gravel access roads and are surrounded by wooded areas. Two wetlands were delineated onsite and a manmade pond is located near the southeast of the Property. Most of the existing dirt and gravel roads will be removed, and a new gravel access road will be constructed to provide access to the Property. Surrounding land use is largely residential or used for agricultural purposes.

The Property includes a centrally located high point and under existing conditions, most stormwater runoff from within the Property limits generally flows overland to the east and west. Existing stormwater management infrastructure includes several riprap and grass/vegetated swales, and various culverts that convey stormwater runoff from the orchard area beneath the internal access roads. No explicit stormwater management infrastructure is present onsite to provide groundwater recharge or treatment of stormwater runoff.

Topography on the site generally consists of flat to gentle slopes (0-8%) near with some steeper slopes (8-15%) approaching the wooded area. Information and computations regarding existing conditions hydrology are contained in the Stormwater Management Report. A copy of this report is included in Appendix E.

6.13.2 Proposed Conditions

Petitioner prepared a Stormwater Management Report in accordance with the CTDEEP Stormwater Quality Manual (“Manual”), publication date September 30, 2023, effective March 30, 2024, and the corresponding Appendix I of the Manual for Stormwater Management at Solar Array Construction Projects. A copy of the report is included herein as Appendix E.

In accordance with the Manual, Petitioner reviewed the NRCS soil mapping to determine potential soil conditions based on available documentation. In conjunction with the cursory review NRCS mapping, Petitioner also performed a subsurface field geotechnical study in May of 2026 to investigate the native soil conditions and presumed infiltration rates at the proposed location of the infiltration basin. As indicated in the attached Stormwater Management Report, pre-development drainage patterns have been maintained to the greatest extent feasible in an effort to maintain pre-development flows to off-site areas.

The proposed solar array development includes the installation of approximately 11,076 panels erected by means of driven piles with a subsequent gravel access drive and two concrete equipment pads. The proposed development of the Project Area includes limited clearing as to accommodate the installation of the solar array, while maintaining existing topography to promote no change to stormwater runoff or flow direction. The proposed stormwater management of post-development conditions implements Low Impact Design Site Planning and Design by utilizing simple disconnection of impervious surfaces. In accordance with Appendix I of the Manual, stormwater runoff from the proposed impervious surfaces are naturally conveyed to a grassed infiltration basin via a riprap stone stabilized swale, and a grassed swale is used to divert stormwater runoff flowing from upland off-site areas. The infiltration basin includes a

sediment forebay and is sized to accommodate the Water Quality Volume for a 1.3-inch rain event. Hydrologic calculations for existing and proposed conditions were performed using HydroCAD software, which uses TR-55 methodology to calculate runoff and TR-20 methodology for stormwater routing through the stormwater conveyance facilities. Site hydrology was evaluated for the 1-, 2-, 10-, 25-, and 100-year 24-hour storms.

The riprap swale was designed to convey the runoff from the 100-year storm event with non-erosive velocity in accordance with the procedure described in Hydraulic Engineering Circular No. 15 (HEC-15) Design of Roadside Channels with Flexible Linings, Third Edition by the Federal Highway Administration. Non-erosive velocities are also achieved for the grass swale with a maximum velocity of less than 3 feet per second during the 10-year design storm event, in accordance with the Manual. The primary outlet at the infiltration basin was designed to pass the 100-year design storm event and serve as an overflow spillway in the event of extreme precipitation (i.e., beyond a 100-year storm).

The site was analyzed for 17 independent existing conditions watershed delineation areas (ES1A, ES1B, ES1C, ES1D, ES1E, ES1F, ES1G, ES1H, ES1I, ES2A, ES2B, ES2C, ES3A, ES3B, ES4A, ES4B, and ES4C), and for 14 proposed watershed delineation areas (PS1A, PS1B, PS1C, PS1D/E, PS1F, PS1G, PS1H, PS1I, PS2, PS3, PS4A, PS4B, PS4C, and PS4D) with associated flow direction and design point, respectively.

As further detailed by the CTDEEP Stormwater Manual for Solar Array Runoff, Verdantas also proposed a series of level spreaders spaced a maximum 150-feet with no greater than a 1-foot per second inflow velocity to ensure long term sheet flow conditions. In addition, upon completion of the solar array, in the areas that will not be farmed, an Ernst grass and forb seed mix shall be planted to further assist in the management of overland runoff.

7.0 Conclusion

The Project clearly meets the standards set forth in Connecticut General Statutes §16-50k(a). Specifically:

- The Project meets CT DEEP's air and water quality standards, with no material emissions associated with either construction or operation, and water quality standards associated with construction and operational stormwater management as a primary focus of the Project's design;
- The Project has been configured to avoid any substantial environmental impacts;
- The Project will not alter areas of core forest;
- The Project would not materially affect the status of prime farmland; and
- The Project is designed to minimize visibility from public viewsheds or from surrounding properties, and there will be no impacts from noise.

Given the benefits this Project will provide to the State of Connecticut, GCE respectfully requests that the Council approve this Project as currently designed and issue a declaratory ruling that a Certificate is not required.