

PHILIP M. SMALL
ATTORNEY-AT-LAW

Direct: 860-509-6575
Fax: 860-509-6675
psmall@brownrudnick.com

185 Asylum
Street
Hartford
Connecticut
06103
tel 860.509.6500
fax 860.509.6501

December 9, 2015

VIA ELECTRONIC MAIL AND OVERNIGHT DELIVERY

Mr. Robert Stein, Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Petition No. 1181 – SolarCity Corporation petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction and operation of a 4.93 Megawatt Community Shared Solar Photovoltaic Electric Generating facility located at 9 Stott Avenue and 292 Plain Hill Road, Norwich, Connecticut -- *Response to December 7, 2015 Interrogatories -- Development and Management Plan Revision: Tree Trimming*

Dear Chairman Stein:

Enclosed are SolarCity Corporation's responses to the Connecticut Siting Council's December 7, 2015 Interrogatories.

If you have any questions, please call me at 860-509-6575.

Very truly yours,

BROWN RUDNICK LLP

By: 

Philip M. Small
Counsel for SolarCity Corporation

PMS/jmb
Enclosure

62260164 v1-WorkSiteUS-022345/0005

**Petition 1181: SolarCity
Norwich, Connecticut
Interrogatories – D&M Plan Revision: Tree Trimming**

- 1. Confirm whether the proposed tree trimming is to mitigate “shading” of the solar panels? Was avoidance (i.e. not cutting the trees or relocation of the solar arrays) considered as mitigation option?**

The newly proposed tree trimming for the Stott Avenue site is solely due to the overhang of the smaller trees over the main access road for the Site and in no way to mitigate shading of the solar panels. The limbs and branches overhanging the roadway will need to be trimmed to accommodate the height and width of construction vehicles accessing the site. As originally designed, the solar panels are located on the opposite side of the access road and are setback an adequate distance from the trees to avoid any shading. Therefore, the proposed tree timing is not due to any potential impacts on the operation of the solar panels. As shown in the photographs provided below, the usefulness of the roadway for construction vehicles is significantly impacted by the low, overhanging trees.





- 2. Would All Points Technology's Environmental Assessment have any changes to its conclusions as a result of the proposed tree trimming?**

The proposed tree trimming activities would not alter the conclusions of the Environmental Assessment prepared by All Points Technology.