



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

November 30, 2017

Christopher Little
Windham Solar LLC c/o Ecos Energy LLC
222 South 9th Street
Suite 1600
Minneapolis, MN 55402

RE: **PETITION NO. 1323** – Windham Solar LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of three 2.0 Megawatt AC and two 1.0 Megawatt AC solar photovoltaic electric generating facilities on an approximate 43 acre parcel located at 134 Bilton Road, Somers, Connecticut.

Dear Mr. Little:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than December 21, 2017. To help expedite the Council's review, please file the responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as a copy via electronic mail. In accordance with the State Solid Waste Management Plan, the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Yours very truly,

Melanie A. Bachman
Executive Director

MB/FC/bm

c: Council Members
Michael Melone, Windham Solar LLC c/o Allco Renewable Energy Limited

Petition No. 1323
Interrogatories
Set Two
November 30, 2017

Project Development

1. Please provide Sheet 2 of 14 and Sheet 3 of 14 of Exhibit A to the petition.
2. Pages 17-18 of the Petition state that the petitioner has contracts with Eversource under the LREC/ZREC Program to sell the renewable energy credits, but does not yet have a contract to sell the energy or capacity. Is the petitioner negotiating a contract to sell the energy or capacity?

Proposed Site

3. Is solar development proposed for the portion of the site parcel located in Longmeadow, Massachusetts?
4. Is the site parcel, or any portion thereof, part of the Public Act 490 Program? If so, how does the town land use code classify the parcel(s)? For example, is/are the parcel(s) classified as “Tillable D – good to fair”?
5. Has the State of Connecticut Department of Agriculture purchased any development rights for any portions of the proposed site as part of the State Program for the Preservation of Agricultural Land?
6. Does the proposed site contain any Connecticut Prime Farmland Soils? If so, what acreage of prime soils are the solar panels and associated equipment proposed to be located on?
7. Under Connecticut General Statutes §16-50k, “Core forest” is defined as unfragmented forest land that is 300 feet or greater from the boundary of forest land and non-forest land. Small core forests are core forest patches that are less than 250 acres. Medium core forests are core forest patches that are between 250 acres and 500 acres. Large core forests are core forest patches that are greater than 500 acres. Would the removal of the 15.5 acres of trees referenced on page 18 of the petition impact core forest? If so, what type of core forest – small, medium or large?
8. Could the site layout be reconfigured to reduce the number of panels or relocate the panels off the west slope of the central and northern section of the site? Would this reconfiguration reduce the 15.5 acres of tree removal?
9. If the reconfiguration in question no. 8 is feasible, please submit an alternative site layout depicting the reduction in the number of panels or relocation of the panels off the west slope of the central and northern section of the site and a narrative describing the reconfiguration.

Energy Production

10. What are the percent losses associated with the operation of the project?
11. Is the project capable of accommodating a future potential battery energy storage system?

12. Would power output be impacted by soft shading of the solar panels, such as air pollution, or hard shading of the solar panels, such as an accumulated solid? If so, would energy production be reduced?

Site Components and Solar Equipment

13. Page 19 of the petition indicates WS plans to install (8) 1000-kilowatt inverters, but also references WS may elect to utilize a string inverter design with (133) 60-kilowatt inverters. Under what circumstances would a string inverter design be employed and why? For example, would the installation of a string inverter design decrease the overall footprint of the project?

Interconnection

14. What is the status of the Eversource System Impact Study referenced on page 7 of the petition?

Public Safety

15. Would the solar plant have a protection system to shut the plant down in the event of a fault within the facility or isolate the facility during abnormal grid disturbances or during other power outage events?
16. Would the project comply with the National Electrical Code, the National Electrical Safety Code, the relevant provisions of the Connecticut State Building Code and any applicable National Fire Protection Association codes and standards?
17. Page 6 of the petition references a 7.5 foot tall chain-link security fence that would surround the entire facility. Could there be a gap in the fence at the bottom to allow for wildlife migration?
18. Where is the nearest airport and/or airfield? Would glare from the solar arrays have any impact on air navigation? Has a glare analysis been conducted?

Environmental

19. Page 10 of the petition references the commencement of a Phase II Environmental Site Assessment (ESA) consistent with the recommendations of the completed Phase I ESA. What is the status of the Phase II ESA?
20. On page 14 of the petition and Sheet 7 of 14 of Exhibit A, both reference a 50-foot wetland buffer. Sheets 3 and 4 of 14 of Exhibit A reference a 100-foot wetland buffer. Please clarify.
21. In Exhibit F of the petition, farm ponds were identified in the Wetland Report. Were these farm ponds determined to be or not to be vernal pools? If the farm ponds were determined to be vernal pools, what is the percent development in the 100-foot vernal pool envelope and the 750-foot critical terrestrial habitat?
22. 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 anticipated? If so, how would the petitioner manage and/or mitigate these impacts?

23. Are residences near the site served by private wells? Assuming some areas are served by private wells, can vibrations caused by the installation of the racking posts cause sediment buildup in adjacent wells? What measures will the petitioner undertake to ensure there is no effect on the wells?

Construction Questions

24. What is the anticipated sequence of construction? During what time of year would each sequence ideally occur? Does this account for possible seasonal construction restrictions due to the presence of protected species?
25. Is the Stormwater Management and Hydrology Report in Exhibit I compliant with the *2004 Connecticut Stormwater Quality Manual*?
26. Has the petitioner considered provisions to handle stormwater during/following an extreme rain event during construction? Are temporary swales and/or basins proposed?
27. Would the stormwater design be installed in phases to control stormwater flows onto adjacent properties during construction?

Maintenance Questions

28. Would snow accumulation on the solar panels affect the output of the facility? Under what circumstances would snow be removed?
29. Has any analysis been conducted to determine structural limits of snow accumulation on the solar panels and steel support structures, assuming heavy, wet snow and or ice? What accumulation of snow could the structures handle? Would the Petitioner clear snow from the panels when it approached the limit?
30. Would any mowing be required under or around the proposed solar panels/modules, and if so, approximately how often would mowing occur? Would the petitioner adhere to any seasonal restrictions on mowing due to the presence of state and/or federal protected species?
31. Would the installed solar panels require regular cleaning or other, similar, maintenance? How would this be accomplished? Would any chemicals be used or only water? Would this maintenance activity have any impacts to water quality?
32. Could the petitioner establish post-construction site restoration/revegetation that includes the incorporation of model pollinator habitat?