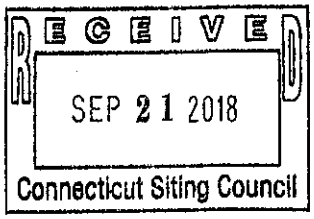
MURTHA CULLINA
ATTORNEYS AT LAW

BRUCE L. MCDERMOTT
203.772.7787 DIRECT TELEPHONE
860.240.5723 DIRECT FACSIMILE
BMCDERMOTT@MURTHALAW.COM

September 21, 2018



ORIGINAL

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

Re: Petition No. 1347 – Interrogatories in Connection with Petition of GRE GACRUX LLC

Dear Chairman Stein:

I enclose an original and fifteen (15) copies of Save the River - Save the Hills, Inc.'s Interrogatories for GRE GACRUX LLC in connection with the above Petition for submission to the Connecticut Siting Council ("Council").

Should the Council have any questions regarding these Interrogatories, please do not hesitate to contact me.

Very truly yours,

Bruce L. McDermott

Enclosures

Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
T 203.772.7700
F 203.772.7723

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

GRE GACRUX 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 16.78-MEGAWATT AC SOLAR PHOTOVOLTAIC ELECTRIC GENERATING FACILITY LOCATED AT 117 OIL MILL ROAD AND ASSOCIATED ELECTRICAL INTERCONNECTION TO EVERSOURCE ENERGY'S EXISTING SUBSTATION AT 325 WATERFORD PARKWAY NORTH IN WATERFORD, CONNECTICUT	:	**PETITION NO. 1347** ORIGINAL **September 21, 2018**

INTERROGATORIES DIRECTED AT PETITIONER GRE GACRUX LLC
BY
SAVE THE RIVER - SAVE THE HILLS, INC.

The following Interrogatories from Save the River - Save the Hills, Inc. ("SRSH") are in regard to the above-captioned Petition (the "Petition") and the associated Project (as defined below) proposed by GRE GACRUX LLC (the "Petitioner"). The term "Project", as used herein means, the Petitioner's proposed construction, operation, and maintenance of a 16.78 megawatt (MW) alternating current (AC) ground-mounted solar photovoltaic (PV) system on the property located at 117 Oil Mill Road, Waterford, Connecticut (the "Site"), as described in the Petition.

1. Reference page 4 of the Stormwater Management Report, which is dated June 8th, 2018, and included in Volume 3 of the above-captioned Petition (the "Report"). Please explain how gravel driveways and solar panels could be considered not impervious.

2. How will the (i) removal of stumps, (ii) regrading of the upper soil layers, and (iii) other vegetative removal associated with the Project impact the ability of the soil underlying the Project to infiltrate runoff? Will such removals result in an increase of runoff during rainfall events?

3. How has the Petitioner addressed the potential for a failure of the erosion control measures that could result from the proposed clearing, removal of stumps and/or regrading of the Site?

4. Reference page 27 of the Report. Explain why the Runoff Curve Number of 58 (class B soil for Meadow, non-grazed) was used.

5. How does the Petitioner plan on addressing the likely increase in runoff associated with the Project such that this runoff does not cause adverse impacts to any receiving watercourse?

6. Reference the erosion control plans. Are Sediment Basins or Sediment Traps being proposed? Please explain why the particular type of system was selected. Please explain your calculations for sizing these Sediment Basins and/or Sediment Traps as per the Connecticut Department of Energy and Environmental Protection ("DEEP") 2002 Guidelines.

7. What type of stormwater basin(s) per the DEEP 2004 Storm Water Quality Manual is/are being proposed by the Petitioner? Please explain why such basin type(s) was/were chosen.

8. Reference page DN-2 of the Project Plan Set. Please provide details of the construction of the outlet control structures associated with these stormwater ponds.

9. Reference page 90 of Appendix B of the Report. If the lowest rectangular orifice is set at elevation 171.74' and the bottom of the pond is set at elevation 172.0', how could water enter the lowest orifice?

10. Reference page 13 of the Report. What are the additional best management practices and how will they function?

11. How will the proposed stormwater basins address non-point source pollutant loads?

12. How will the proposed stormwater basins address thermal impacts of the runoff from the Project?

13. Reference page 13 of the Report. How would the Petitioner address the water quality and volumetric requirements found in the DEEP 2004 Storm Water

Quality Manual if the gravel driveways and solar panels are determined to be impervious?

14. How will the Petitioner satisfy the hydrologic requirements of the General Permit for the Discharge of Stormwater from construction activities and dewatering activities?

15. How will the Petitioner address stormwater concerns associated with the Project if soil tests at the Site demonstrate that the location and type of basin proposed for the Project cannot be constructed at the Site's current location?

16. During construction, how will the Petitioner prevent the Project's stormwater management systems from failing?

17. If the Project's stormwater management system does fail, what steps has the Petitioner taken to prevent the discharge of turbidity and sediment into receiving inland wetlands and watercourses?

18. Reference the erosion control plans. Why is the Petitioner using a singular barrier or siltation fence at the limit of disturbance for the Project rather than a perimeter barrier consisting of a Filtrexx Soxx?

19. The Petitioner has proposed many temporary and/or permanent swales on the Site that are located on grades steeper than 6%. How will erosion of these swales be prevented?

20. Reference page 14 of the Petition. How will the Project's steepness of grade affect (1) runoff, and (2) erosion of the proposed gravel roads?

21. On page 22 of the Report, the Petitioner states, "Due the existing rock ledge promoting forest and ground cover growth, the rock ledge impact on the stormwater analysis is considered negligible and pervious." Please explain how the rock ledge is "pervious"?

22. Explain why no ground borings were done in the area of any of the proposed stormwater basins?

23. Reference pages 14–15 of the Petition. If the Petitioner encounters shallow bedrock at the Site of the Project, would this bedrock be removed? If so, how would it be removed? How would bedrock removal affect the design of the stormwater management system?

24. What percentage of the area of the ground-mounted solar photovoltaic PV system has ledge at the ground surface?

25. How will the Petitioner maintain the pre-development hydrologic conditions at the Site as per the requirements of the DEEP General Permit?

26. If shallow groundwater is exposed by the site grading, this will increase the water directed to a stormwater basin. How will this potential increase of runoff be addressed? How will saturated soils be stabilized if groundwater is exposed on the ground surface?

27. How would the compacting of soil at the Site affect the underlying ground water table?

28. Refer to Exhibit Q of Petitioner's Responses to Council Interrogatories, Set One, 9/7/18, page 7 of the GeoReport by Terracon (May 22, 2018). This report states that the exposed subsoil will be compacted with a 10 ton roller, which will reduce infiltration. How will the Petitioner address the resulting increased runoff directed to the stormwater basins?

29. Refer to Exhibit Q of Petitioner's Responses to Council Interrogatories, Set One, 9/7/18, page 6 of the GeoReport by Terracon (May 22, 2018). This report notes that piles for the solar panels may create issues because of the compactness of the soils, the presence of underground boulders, and the fact that the upper 3.5' of soils on the site are subject to frost heaving. How has the Petitioner addressed these issues?

30. The Niantic River Watershed Management Plan, (2006), includes pollutant loading modeling for potential development in the watershed. Development of this parcel is identified in the model and has indicated that there is a potential for a resulting increase in the total nitrogen, phosphorus and total suspended solids loading by greater than 100% over existing loadings. How does the Petitioner plan on addressing concerns of increased pollutant loadings?

31. How will this Project affect the native trout populations in Stony Brook and Oil Mill Brook? What considerations has the Petitioner made in regard to these trout?

32. Refer to Exhibit Q of Petitioner's Responses to Council Interrogatories, Set One, 9/7/18, page 19 of the GeoReport by Terracon (May 22, 2018). This report discusses how the movement of heavy construction vehicles over gravel roadways can result in rutting of the surface. What are the maintenance protocols for the gravel driveways to ensure that they remain stable and are not subject to erosion during or after the construction period?

33. Refer to Petitioner's answer to question 85 of Petitioner's Responses to Council Interrogatories, Set One, 9/7/18. Aside from mowing under or around the Project, does Petitioner plan on using any herbicides or other chemicals in maintaining the grounds underlying the Project?