SHERIN AND LODGEN

Matthew S. Cote
617.646.2020
mscote@sherin.com
27937/212

August 7, 2018

VIA OVERNIGHT DELIVERY

Melanie Bachman
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, Connecticut 06051

Re: **West Farms Mall, LLC, with Safari Energy, LLC**
Petition for a Declaratory Ruling for the Construction and Operation of a 2.7618 MW (DC) / 2.019 MW (AC) Solar Photovoltaic Renewable Energy Generating Facility located at 1500 New Britain Avenue, West Hartford, Connecticut and 500 South Road, Farmington, Connecticut

Dear Ms. Bachman:

Enclosed please find an original and fifteen (15) copies of the above captioned Petition, together with one 24x36" copy of three (3) plans and a filing fee of $625.00.

In the Petition, Safari Energy, LLC, as agent for West Farms Mall, LLC, respectfully requests that the Connecticut Siting Council approve the location and construction of a 2.019 MW (AC) solar photovoltaic renewable energy generating facility to be located at the site of the Westfarms Mall in West Hartford and Farmington, Connecticut, for the purpose of generating electricity to be used on site.

Should you have any questions, concerns or require additional information, please contact me at 617-646-2020 or Brendan Canavan of Safari Energy, LLC at 646-465-8116.

Very truly yours,

Matthew S. Cote
Counsel for Safari Energy, LLC

Enclosures

00828638.1

WEST FARMS MALL, LLC
with
SAFARI ENERGY, LLC

PETITION FOR A DECLARATORY RULING FOR THE CONSTRUCTION AND OPERATION OF A 2.7618 MW (DC) / 2.019 MW (AC) SOLAR PHOTOVOLTAIC RENEWABLE ENERGY GENERATING FACILITY

located at

1500 NEW BRITAIN AVENUE, WEST HARTFORD, CONNECTICUT

and

500 SOUTH ROAD, FARMINGTON, CONNECTICUT

AUGUST 6, 2018

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I. INTRODUCTION

Pursuant to Section 16-50k(a) and Section 4-176(a) of the Connecticut General Statutes ("CGS") and Section 16-50j-38 *et seq.* of the Regulations of Connecticut State Agencies ("RCSA"), West Farms Mall, LLC, acting through its agent, Safari Energy, LLC requests that the Connecticut Siting Council (the "Council") issue a declaratory ruling approving the construction and operation of a 2.7618 MW (DC) / 2.019 MW (AC) solar electric generating facility (the "Facility"), located on land in a special development district at 1500 New Britain Avenue, West Hartford, Connecticut and in a business restricted district at 500 South Road, Farmington, Connecticut (collectively, the "Site"). A de minimus portion of the Site (away from the proposed location of the Facility) is located in Newington, Connecticut.

CGS §16-50k(a) provides:

> "Notwithstanding the provisions of this chapter or title 16a, the council shall, in the exercise of its jurisdiction over the siting of generating facilities, approve by declaratory ruling . . . (B) the construction or location of . . . any customer-side distributed resources project or facility. . . with a capacity of not more than sixty-five megawatts, as long as such project meets the air and water quality standards of the Department of Energy and Environmental Protection . . ."

Pursuant to CGS §16-50k(a), the Council shall approve the Facility by declaratory ruling as a customer-side distributed resources facility under 65 MW in capacity that complies with the air and water quality standards of the Connecticut Department of Energy and Environmental Protection ("DEEP"). Further, CGS §16a-35k establishes the State's energy policies, including the goal to "develop and utilize renewable energy resources, such as solar and wind energy, to the maximum extent possible." As demonstrated from the information included in this petition, the Facility will result in no air emissions, has minimal impacts that comply with DEEP's air and water quality standards, and will have no substantial adverse environmental effects. The Facility will further the State of Connecticut's energy policy by developing renewable energy resources. The Facility also furthers the State of Connecticut's goals announced in the 2013 Comprehensive Energy Strategy (the "CES"): "Connecticut has suffered from some of the country's worst air pollution, in part due to its geographic location downwind of out-of-state coal- and oil-burning power plants. A cleaner energy future requires support for electricity generation from low- or no-emission sources."[1] The Facility will be an important part of that cleaner energy future. The CES also emphasizes the necessity for the "development of more distributed generation", which includes the Facility.[2]

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[1] *See*, 2013 Comprehensive Energy Strategy for Connecticut, p. 70, available at http://www.ct.gov/deep/lib/deep/energy/cep/2013_ces_final.pdf

[2] Id. at p. 71.

II. PETITIONER

West Farms Mall LLC ("West Farms Mall"), a Delaware limited liability company[3], has been a good steward of the Site over its forty-five years of ownership operation of the mall located thereon. It will continue to operate with an awareness of the environmental impact of its activities, including through the construction and operation of the proposed Facility. West Farms Mall has hired Safari Energy, LLC, a Delaware limited liability company[4] ("Safari Energy") to design, permit, and construct the Facility. Safari Energy was founded in 2008 and has become a leading partner for large commercial property owners looking to utilize solar power. Having developed over 250 projects nationwide, including dozens of mall properties, Safari has the knowledge and experience to develop and implement the Facility in a way that maximizes the renewable energy potential, with no significant adverse impacts.

Correspondence and/or communications regarding this petition should be addressed to:

Safari Energy
c/o Brendan Canavan
1407 Broadway
Floor 24
New York, New York 10018
Phone: 646-465-8116
Email: bcanavan@safarienergy.com

III. DESCRIPTION OF PROPOSED FACILITIES

The State of Connecticut has recognized the benefits of local renewable energy development and implemented renewable portfolio standard ("RPS") to encourage the development of renewable energy resources not only to lessen the country's dependence on foreign oil but also to reduce the environmental impacts associated with fossil fuel sources. The RPS requires that by 2020, twenty percent (20%) of electricity generation must be derived from Class I renewable energy sources such as solar photovoltaic (PV).

The Facility will play an important role in the State's renewable energy goals. The Facility will provide a significant source of clean, renewable energy produced locally. The Facility will produce 100 percent clean, renewable electricity with zero emissions will result in significant environmental benefits. Further, the Facility will act as a peak reducer by producing energy during the electric distribution companies' peak load hours. The Facility will therefore help moderate peak load requirements and reduce the demand on transmission lines.

A. Site Selection

The Site was selected based upon it being West Farms Mall's own land and the site of the structures which will use the energy produced by the Facility. The location on the Site was selected based upon a number of factors including:

[3] with a business address of 200 East Long Lake Road, Suite 300, Bloomfield Hills, MI 48304
[4] with a business address of 1407 Broadway, New York, New York 10018.

- solar resources;
- topographic characteristics for efficient facility design and construction;
- proximity to electrical infrastructure and roadways (the Site has direct public road access and is directly adjacent to an Eversource 3-phase electric distribution line);
- areas of existing development, so as to minimize the environmental impact;
- minimizing the impact on the existing use of the Site;
- consent of existing tenants to the extent required under leases affecting the Site; and
- minimizing the visual impact on abutters.

B. Site Description

The Site is located on land in a special development district at 1500 New Britain Avenue, West Hartford, Connecticut and in a business restricted district at 500 South Road, Farmington, Connecticut (collectively, the "Site"). A de minimus portion of the Site (away from the proposed location of the Facility) is located in Newington, Connecticut. An aerial view of the Site with the location of the proposed Facility can be found in Exhibit A (Facility Layout); a zoning map of the Site can be found in Exhibit B (Zoning Maps); and an Existing Conditions Survey and ALTA Survey showing the Site's general location, characteristics, and boundaries can be found in Exhibit C (Existing Conditions Survey and ALTA Survey). The Site is predominately impervious, consisting of existing mall structures and paved parking areas, with landscaped islands throughout the parking area. All existing structures will remain except for five (5) light poles in the proposed solar parking canopy area, which will be removed and replaced with under canopy lighting. A proposed plan to light the area under the canopies can be found in Exhibit H (Lighting Plan for Solar Parking Canopies). A minimal amount of trees will need to be removed (as discussed in Section VI(A), below), but the percentage of landscaped area will remain unchanged as the existing landscaped islands and low-lying vegetation will remain in place. The Site is surrounded by a ring of vegetation, including on a 22.96 acre parcel designated as "open space" as part of the mall development, to the west, and a 7.97 acre parcel owned by Connecticut Light & Power Company to the south. To the north of the Site is Highway 84 and to the east is Route 71. The proposed location of the solar parking canopies is on an existing paved parking area in the southwest corner of the existing paved parking area, nearest the large buffer parcels, surrounded by vegetation and bounded on the south, east, and west by the paved ring road that provides access to the mall. To the north of the canopy area is an existing parking garage. Based on the aerial mapping and the previously approved site development plans for the use of the Site as a mall, there is a stream channel running along the outside of the ring road flowing in a southerly direction with wetlands located to the south. Immediately south of the ring road is an existing retention pond that provides stormwater management for the mall. A plan of the wetlands affecting the Site can be found in Exhibit N (Wetlands Map).

C. Facility Description

The Facility is a renewable energy generation facility that will use solar photovoltaic modules to convert solar radiation to electricity. The Facility will be comprised of solar arrays located on the roof of the mall building and a solar canopy system located on the existing parking lot in the southwest corner of the existing paved parking lot. The roof system will consist of 1,684 solar modules totaling 519.5 kW (AC) and the solar canopy system will consist of 5,108 solar modules totaling 1.5 MW (AC). The Facility, with the roof and canopy systems combined, totals 2.019 MW (AC).

The modules will be oriented due south, with an azimuth ranging between 107 and 198 degrees, at a tilt angle of approximately 5 degrees. The panels on the roof system will be mounted using a combination of ballasted racking system and roof attachments. The panels on the solar canopy will be supported by steel columns which rise approximately 9ft above the parking lot grade, and which extend to the pavement surface where they meet the concrete footing below the pavement. The canopy has been strategically placed to avoid any conflicts with existing underground utilities. The canopies will be located over the existing parking stalls with the columns located, to the extent practicable, on the spine of the spaces on the painted markings, so as not to interfere with existing parking.

The solar modules will be wired in series strings of 18 modules per string for the canopy and 36 modules per string for the roof. Strings will be connected to inverters located on the roof (one 20 kW inverter and fifteen 33.3 kW inverters) or on the canopies (fifteen 36 kW inverters and sixteen 60 kW inverters). The inverters alter the DC output of the solar modules to 480V three-phase alternating current ("AC") output. All the inverters will sit behind a solar generator disconnect switch AC (known as a rapid shutdown initiation device), which will be mounted to the exterior wall of the electrical room where the system will be interconnected.

The solar parking canopy columns will be installed using helical coring and filled with concrete. All column hole locations have been mapped (see the second page of Exhibit G, below) and sub-surface conditions determined by a geo-technical survey. An existing conditions plan can be found on the first page of Exhibit C (Existing Conditions Survey and ALTA Survey).

All elements of the Facility's design, construction, operation, and maintenance will be performed in accordance with all applicable local, state, and national rules, guidelines, and regulations. The particulars of the Facility's footprint design and equipment locations can be seen in detail in Exhibit A (Facility Layout), Exhibit E (Sketch of Rooftop Equipment), Exhibit G (Structural Drawings of Solar Parking Canopies), and Exhibit S (Equipment Specification Sheets).

D. Interconnection

The Facility is proposed to be interconnected behind existing Eversource customer meters located in the main mall building. All of the electricity generated by the Facility

will be used on Site and applied towards offsetting the electricity used by the mall and its tenants. On August 1, 2018 Eversource granted Contingent Approval for the three points of interconnection of the Facility (two for the solar canopy system, one for the roof system) (see Exhibit Q). The Facility was also subject to an Impact Study from Eversource (see Exhibit R, which study was performed on a different system layout, but substantially similar system), and Safari Energy is complying with the results of the study to design and install protection (breakers/switches/relays) for the Facility. The interconnection will be made pursuant to Eversource's Guidelines for Generator Interconnection.

E. Service Life and Capacity Factor

The Facility's equipment has an expected useful life of approximately 30 years, and the Facility would operate until the equipment has exhausted its useful life. According to the 2014 Integrated Resources Plan for Connecticut, PV solar has an expected capacity factor of approximately 13 percent.

IV. FACILITY BENEFITS

Projects that are "necessary for the reliability of the electric power supply of the state or for a competitive [electric market]" present a clear public benefit. Conn. Gen. Stat. §16-50p(c)(1). The Facility provides exactly the benefit contemplated in the statute and more, as it will generate much of its power at peak times. By providing electricity when there is high demand, the Facility will help stabilize the electrical grid.

Additionally, there exists a clear public need for renewable projects and undertaking them supports the State's energy policies as codified in Conn. Gen. Stat. §16a-35k, expressing the legislature's goal to "develop and utilize renewable energy resources, such as solar and wind energy, to the maximum practicable extent." Solar facilities are considered Class I renewable energy sources under General Statutes §16-1(a)(26). Over the life of the Facility, it will contribute to a significant reduction in NOx, SOx, PM, CO and VOC emissions as compared to combustion-based generation. These figures are further outlined in Section VI(C), below. Additionally, the Facility will deliver its generated power 'locally' as all of the power generated by the Facility will be used to offset a portion of the electricity demands of the mall located on the Site. This decreases the amount of power that will need to be imported to the Site, lightening the load on utility transmission infrastructure and increasing local grid reliability.

The Facility will also help the State move closer to meeting its renewable portfolio standards. Further, providing increased renewable capacity helps further distance Connecticut from foreign energy supply and helps support energy independence, a local and national goal.

As part of larger state, national, and global strategies, reductions in greenhouse gas emissions from the Facility will have long-term secondary biological, social, and economic benefits. Similarly, the advancement of renewable resources at a distributed level contribute to our Nation's desire for energy independence and reduces our dependency upon foreign countries where geo-political issues may introduce issues with the reliability of their fuel supply. Safari

Energy intends hire local labor, as practical, and be a source of increased revenue for local businesses during construction.

V. LOCAL INPUT & NOTICE

West Hartford (rooftop only): On April 24, 2018 and May 3, 2018, Todd Dumais, Town Planner, and Brittany Bermingham, Planning Technician, were provided with (i) an early version of the layout of the proposed Facility (while portions of the Facility have since been revised, the portions to be located in West Hartford remain unchanged); (ii) street view images; (iii) calculations demonstrating the rooftop system will not be visible from the ground; (iv) elevations of a typical ballasted PV rooftop system; and (v) elevations of a typical rooftop inverter. Mr. Dumais concluded his review of the submitted materials, stating that he had no concerns with the proposed Facility and that the proposed Facility will not trigger any Special Development District zoning review or approval process and will be subject only to receipt of a building permit to commence construction.

Farmington (rooftop and parking canopies): On July 3, 2018, the municipality was provided with (i) an overhead showing the proposed layout of the Facility; (ii) elevations of roof mounted solar modules; and (iii) excerpts from draft Structural Plans for the parking canopies showing a more detailed layout, elevations, and renderings. On July 19, 2018, Safari Energy LLC and members of its team met with William Warner, Town Planner, Shannon Rutherford, Assistant Town Planner, and Bruce Cyr, Town Engineer, to discuss the proposed Facility. On July 23, 2018, the proposed Facility was presented to the Farmington Inland Wetlands Commission. On July 30, 2018, the proposed Facility was presented to the Farmington Town Planning and Zoning Commission. The feedback from these meetings was positive.

Newington (No structures): The portion of the Site located in Newington is de minimus. No structures relating to the Facility are proposed for the portion of the Site located in Newington. Safari Energy has provided notice of this petition to appropriate municipal officials in Newington, as set forth below.

Notice: In addition to contacting the municipalities of West Hartford and Farmington directly, notice of this petition has been provided to all abutters and appropriate municipal officials and government agencies to whom notice is required pursuant to CGS §16-50j-40(a). For details, see Exhibit T (Notices).

VI. POTENTIAL ENVIRONMENTAL EFFECTS

Safari Energy has evaluated the Site and taken inventory of the resources available onsite. The Facility has been designed so as to be compatible with the existing environment while avoiding, reducing, and mitigating potential environmental impacts.

A. Natural Environment and Ecological Balance.

The Site selected for the Facility's footprint is not an area with any sensitive, rare, or protected natural resources. The Facility will be entirely constructed on both the roof of existing buildings and in parking lot areas that are already developed and

paved. See Exhibit A (Facility Layout). Facility construction will require the removal of thirty-nine (39) trees located in man-made landscaped islands in the parking lot area where the solar parking canopies are to be located. Additionally, Facility operation will require the trimming or removal of an additional twenty-five (25) trees abutting the footprint of the parking canopies to the southeast to prevent interference with insolation to the Facility. A tree removal plan with aerial views of existing conditions can be found in Exhibit K (Tree Removal Plan). With respect to these abutting trees, Safari Energy will endeavor to limit its activities to trimming wherever practical (including waiting to designate trees for removal until construction or operation shows such removal to be the preferred course) and will look to offset such removal with additional plantings. Despite the tree removal, the percentage of landscaped area will remain unchanged as the existing landscaped islands and low-lying vegetation will remain in place. No hazardous substances or materials will be used or stored onsite during construction or operation.

B. Public Health and Safety

Overall, the Facility will meet or exceed all health and safety requirements applicable for electric power generation. During construction, each employee working onsite will:

1. receive required general and site specific health and safety training;
2. comply with all health and safety controls as directed by local and state requirements;
3. understand and employ the site health and safety plan while on the job site;
4. know the location of local emergency care facilities, travel times, ingress and egress routes; and
5. report all unsafe conditions to the construction managers.

It is anticipated that approximately 10-20 passenger vehicles would make daily trips onto the Site, plus weekly delivery of construction materials, during the approximately one hundred (100) day construction period. During construction, noise may be audible offsite. Therefore, all work will be conducted during normal weekday working hours (7:00am-5:00pm), and it is not anticipated that any levels of construction noise will exceed state or local noise limit standards. During operation, the Facility will not present a health or safety hazard to the general public. Inverters will be mounted on columns or on the roof and inaccessible to the general public. Operation of the Facility will not generate any offsite noise, harmful glare, vibrations, or damaging emissions of any kind. PV solar is a long-proven safe and benign generation technology. An operations plan can be found in Exhibit P.

Authorized personnel visiting the Facility during operation will be fully licensed and properly trained on how to navigate a solar facility safely and how to quickly respond in the event of an emergency. Appropriate means of disconnect to shut down the Facility in the event of an emergency will be located on the ground, but inaccessible to the general public. Once operational, Safari Energy will work with local fire and law enforcement

officials to ensure they have the appropriate knowledge and access to provide their services to the Facility if necessary. In addition, the inverters have UL-1741 certification and will de-energize the Facility with the loss of utility power.

C. Air Quality

Overall, the Facility will have minor to no air emissions of regulated air pollutants and greenhouse gases during construction and no air permit will be required. During construction, any air emission effects will be temporary and negligible. During operation, the Facility will not produce air emissions of regulated air pollutants or greenhouse gases (e.., PM10, PM2.5, VOCs, GHG, or Ozone). Thus, no air permit will be required. Moreover, the Facility will have a net benefit effect on air quality, as over its anticipated 30 years of operation, the Facility will result in the offset/elimination of approximately 6,980 metric tons[5] of CO_2 equivalent, which is equal to 14,343 passenger vehicles off the road[6] or 23,338 tons of avoided landfill waste[7].

D. Scenic Values and Visual Renderings

Once installed, the Facility will be minimally visible from surrounding properties. The Site is bordered on the north by vegetation and, where there is limited vegetation, by South Road, across from which is additional vegetation; on the east by vegetation and, where there is limited vegetation, by Route 71, across from which are commercial plazas and residences (but no residences are visible from the paved area of the Site); and on the south and west by vegetation, including a 22.96 acre parcel owned by West Farms Mall and designated as "open space" to the west and a 7.97 acre parcel owned by Connecticut Light & Power Company to the south. It is in this southwest corner that the parking canopies are to be located. Google Street View images from both the perimeter of the Site and from the proposed location of the solar parking canopies (demonstrating that the solar parking canopies are well screened) can be found in Exhibit D. Calculations demonstrating that the rooftop equipment will not be visible from the perimeter of the Site can be found in Exhibit F.

E. Wildlife & Habitat

According to the 2017 Natural Diversity Data Base Areas map for Farmington, Connecticut (also depicting the relevant portion of West Hartford), the only area of the Site containing "State and Federal Listed Species & Significant Natural Communities" is

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[5] CO2 off-set calculations were made using the US Environmental Protection Agency ("EPA") GHG Equivalencies Calculator: https://www.epa.gov/energy/ghg-equivalencies-calculator-calculations-and-references

[6] Passenger Vehicle off-set calculations were made using the EPA GHG Equivalencies Calculator: https://www.epa.gov/energy/ghg-equivalencies-calculator-calculations-and-references

[7] Avoided landfill calculations were made using the EPA GHG Equivalencies Calculator: https://www.epa.gov/energy/ghg-equivalencies-calculator-calculations-and-references

the far southeast corner, away from the proposed location of the Facility. A copy of the map can be found in Exhibit O. The Facility will be located outside of this area, on the rooftop of existing buildings and on existing paved parking areas and as such will have no impact on sensitive plant or wildlife species or the associated habitats.

F. Water Resources and Storm Water Management.

The Facility is not anticipated to have an impact to the water resources of the state and will have a negligible impact on storm water. The Facility will be located on the rooftop of existing buildings and on existing paved parking areas. The parking canopies are pervious, with a ¾" gap between each of the solar panels, allowing storm water and snow melt to pass through the structures onto the existing pavement below. Sketches and images demonstrating the perviousness of the canopies can be found in Exhibit I. Existing drainage patterns will remain.

There are no vernal pools or wetlands located in the area proposed for the Facility. There is a stream channel running along the western edge of the Site flowing in a southerly direction with wetlands located to the south, including an existing retention pond that provides stormwater management for the mall, but no work will be done in these areas. A map showing the wetlands affecting the Site can be found in Exhibit N.

Impacts from construction of the Facility will be mitigated as follows:

- Per guidance from the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control document, Safari Energy will use proper measures to manage sediment onsite. Routine inspections will be performed to ensure that project's soil erosion and sediment control measures are properly installed and maintained. An example of a stormwater construction report can be found in Exhibit J.

- Dust will be controlled and contained onsite by regular mechanical sweeping within the construction area, and at the construction entrance if necessary.

- The downgradient limit of work will be surrounded by a silt barrier to intercept and retain sediment. These barriers will protect existing downstream wetlands and waterways from any excess sediment. Downgradient catch basins will also be surrounded by silt sacks. An example can be seen on the last page of Exhibit G. Barriers will be inspected at least once a week and within 24 hours of the end of a storm with a rainfall amount of 0.5 inches or greater to determine maintenance needs. In instances of observed failure, silt barriers will be replaced or repaired within 24 hours. Failures include the overtopping, undercutting or bypassing of runoff water, barriers that have been moved out of position, or deteriorated or damaged barriers.

- Due to the nature of the project, minimal stockpiles are expected. However, in the event of stockpiles, they will be located away from adjacent wetlands and waterways, drainageways, and steep slopes. Erodible stockpiled material will be no steeper than 2:1. Stockpiles that are not to be used within 30 days will be seeded and mulched immediately upon formation. Silt socks will be installed as a barrier around stockpiles at approximately 10 feet from the proposed toe of the slope. Sediment barriers around stockpiles will be inspected in a similar fashion to those around the limit of work and catchment basins.

VII. ADDITIONAL INFORMATION

The Council has previously reviewed petitions for other solar facilities similar to the ones being proposed by the Petitioner. In these other dockets, the Council has sent out interrogatory requests with multiple questions about the proposed facility. This section will attempt to pre-emptively answer some of those questions that were not addressed in previous sections of this petition.

1. What is the efficiency of the photovoltaic module technology that would be employed by the Petitioner at the proposed Site? Does this efficiency decrease over time? The efficiency will be approximately nineteen percent (19%), decreasing at a predicted average rate of one-half percent (0.5%) per year.

2. Would the angles of the Facilities' solar modules be adjusted during the year to maintain optimal alignment with the sun's changing path? No. The solar modules will be installed on a fixed-tilt.

3. Approximately what percentage of the proposed facilities' maximum possible output would occur during those times of the year when Connecticut normally experiences its peak demand for electricity? Energize Connecticut (http://www.energizect.com) defines the peak electricity demand in Connecticut as occurring weekdays between noon and 8 pm, during the summer months of June through September. The Facility will create approximately 14% of their total annual output during this timeframe.

4. Does the Petitioner have contracts to sell the electricity it expects to generate with the proposed Facility? No, all of the electricity produced by the Facility will be used to offset the demand of the mall located at the Site.

5. Is the Facility located near any Important Bird Areas designated by the Connecticut Audubon Society? No.

6. Describe how the Facility would be decommissioned at the end of its useful life. West Farms Mall will own both the Facility and the Site. As such, West Farms Mall may leave the Facility up beyond its useful life and is not required to submit a decommissioning plan.

7. Where is the nearest off-site residence from the center of the solar array? The nearest residence to the boundary of the Site is 40 feet (to the north). The nearest residence to the proposed location of the parking canopies is 570 feet (to the west, separated from the parking canopies by the 22.96 acre, vegetated parcel designated as "open space".

8. In general, in the case of fixed solar panels, does orienting your solar panels to the south provide a sort of balance (in terms of sun exposure) between the sun rising in the east and setting in the west and ultimately result in optimizing (or attempting to maximize) your total annual energy production (in kilowatt-hours) and your capacity factor? This statement is correct. To the extent possible, the roof system is oriented south while keeping it mounted parallel to the roof edge, as is industry practice for flat roofs. Orientation of the solar parking canopies is restricted by the alignment of the existing parking stalls, but is also oriented south to the extent possible.

9. Please provide the specification sheets for the inverters and solar modules/panels. Please see the attached Exhibit S for the specification sheets for the inverters and solar modules that are currently selected for the project.

10. Is the proposed Facility located within an aquifer protection area? No, the proposed Facility is not located within an aquifer protection area. The nearest aquifer protection area is approximately 4.3 miles from the Site. See a map showing the closet aquifer locations at Exhibit M.

11. Is the proposed Facility located within a 100-year or 500-year flood zone? If yes, indicate which portion(s) of the project area are located within flood zones, and provide a Federal Emergency Management Agency flood zone map that includes the subject property. While the southwest border of the Site is located within a 100-year flood zone, the proposed Facility is not located within this area. A flood zone map can be seen at Exhibit L.

12. Would the solar panels "heat" rainwater and potentially thermally pollute wetlands? No. There is no evidence that this occurs given the short duration that rainwater is on the panels, furthermore, the panels would be clouded during the time of rainfall, leaving surface temperatures of the panels less than on a sunny day.

13. Does the proposed Facility meet the applicable DEEP noise standards at the boundaries of the subject properties? (Sources of noise might include but not be limited to inverters, transformers, etc.) Yes

14. Has Petitioner any analysis to determine structural limits of snow accumulation on the solar panels and steel support structures, assuming heavy, wet snow? The rooftop and canopy components of the Facility are designed in compliance with local building codes, including snow loads.

VIII. CONCLUSION

The Facility will provide numerous and significant benefits to the municipalities, the State of Connecticut and its citizens, while producing significant environmental benefits with minimal environmental impact. Pursuant to CGS §16-50k(a), the Siting Council shall approve by declaratory ruling the construction or location of customer side distributed resources project or facility with a capacity of not more than sixty-five (65) MW, as long as such project meets DEEP air and water quality standards. The Facility meets these criteria. The Facility is a customer-side distributed resources facility "grid-side distributed resources" facility, as defined in CGS §16-1(a)(40), because the Facility involves "the generation of electricity from a unit with a rating of not more than sixty-five megawatts on the premises of a retail end user within the transmission and distribution system including, but not limited to . . .photovoltaic systems," and, as demonstrated herein, the Facility will meet DEEP air and water quality standards. The Facility will not produce air emissions, will not utilize water to produce electricity, was designed to minimize wetland impacts, will result in no net increase in runoff to any surrounding properties, and furthers the State's energy policy by developing and utilizing renewable energy resources and distributed energy resources. In addition, as demonstrated above, the Facility will not have a substantial adverse environmental effect in the State of Connecticut.

Accordingly, Petitioner respectfully requests that the Siting Council approve the location, construction and operation of the Facilities by declaratory ruling.

Respectfully Submitted,

SAFARI ENERGY, LLC

By: _____
Name: Brendan Canavan
Title: VP Development

"ORIGINAL"
Counsel

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