



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

December 13, 2018

David W. Bogan, Esq.
Kathryn E. Boucher, Esq.
Locke Lord LLP
20 Church Street
Hartford, CT 06103

RE: PETITION NO. 1352 – Nutmeg Solar, 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 19.6-megawatt AC solar photovoltaic electric generating facility on approximately 162 acres comprised of 9 separate parcels located generally south of Bailey Road and east of Route 191 (Broad Brook Road), and associated electrical interconnection to Eversource Energy's Scitico Substation at 20 Bailey Road in Enfield, Connecticut.

Dear Attorneys Bogan and Boucher:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than January 3, 2019. To help expedite the Council's review, please file individual 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.

Sincerely,

Melanie A. Bachman
Executive Director

MB/MP/lm

c: Council Members
Neil E. Watlington-Armstrong, Nutmeg Solar, LLC
Matthew Singer, Nutmeg Solar, LLC

**Petition No. 1352
Interrogatories
Set Two
December 13, 2018**

Site Alternatives

73. Which project site alternatives, consistent with the Tri-State Clean Energy RFP (Tri-State RFP) requirements, were considered by Nutmeg Solar, LLC (Nutmeg or Petitioner)? What were Nutmeg's site selection criteria? Is the proposed site the only known available site that would meet such criteria?
74. Were any other raw land sites (consistent with Tri-State RFP requirements) considered? Were any of these sites already developed? Why were such sites rejected?
75. Were any brownfield sites considered? If yes, provide the addresses of such sites and the reason(s) for rejection.

Public Outreach

76. On page 17 of the Petition, Nutmeg notes that it held an open house for abutters on August 1, 2017 to provide information and answer questions or concerns about the proposed project. Abutters also attended the presentation at the Enfield Town Hall on August 9, 2017. A community open house was also held on September 26, 2017. What kinds of feedback on the proposed project did Nutmeg receive from abutters based on these meetings? And how did Nutmeg respond to such feedback?
77. Were any public information meetings held after September 26, 2017?

Proposed Site

78. Referencing the response to Council interrogatory 13, the nearest off-site residential property line is about 5.5 feet from the proposed perimeter fence. Provide the distance from the proposed perimeter fence to the closest corner of the residence.

Project Development

79. Estimate the total cost of the proposed project. Break down the total cost into categories that the Petitioner deems appropriate.
80. Referencing the response to Council interrogatory number 1, Nutmeg provided a list of permits and regulatory approvals required for the proposed project. Of those listed below, indicate which permit/approval applications have already been filed and when, and indicate which applications would be filed later if the project is approved by the Council.
 - a) DOT Encroachment Permit;
 - b) Town of Enfield Building Permit;
 - c) Town of Enfield Electrical Permit; and
 - d) CT PURA Class I Certification.

81. Based on the 400 W solar module configuration versus the originally proposed 345 to 355 W configuration, could the solar facility be potentially decreased in area or physical size?

Capacity

82. Referencing the response to Council interrogatory 14, Nutmeg notes that, "The proposed Project has a 32.14 MW DC capacity based on current solar module power rating assumptions." Is that based on the updated 400 MW DC panels or the originally proposed 345 W to 355 W panels? How was 32.14 MW DC computed based on the 72,520 modules of not more than 400 W each? Explain.

Public Benefit

83. On page 112 of the Electric Power Sector portion of the 2018 Comprehensive Energy Strategy, it notes that, "Most recent analyses indicate that there should be adequate Class I resources available to meet Connecticut's Class I Renewable Portfolio Standards (RPS) goals in 2020." However, is it correct to say that this February 8, 2018 report was based on the (then current) "20 percent by 2020" RPS requirement?

Interconnection

84. Referencing the response to Council interrogatory 32, the Petitioner expects that the equipment and modifications at the Scitico Substation would be provided as part of a Development and Management Plan if ordered by the Council. Generally, what types of modifications would be required for the Scitico Substation? Would such modifications necessitate an expansion of the fenced substation?

Magnetic Fields

85. Referencing pages 8 and 9 of the Petition, there would be an underground 115-kV transmission line from the collector substation to Eversource's Scitico Substation. Would it be one circuit or two? Would the Petitioner expect that the transmission line design would comply with the Connecticut Siting Council's Electric and Magnetic Field Best Management Practices for the Construction of Electric Transmission Lines in Connecticut?
86. Provide a projected magnetic field profile in milliGauss (mG) of a cross-section of the proposed 115-kV underground line based on peak load conditions. Identify the highest projected magnetic field in that profile in mG.
87. Would the proposed modifications to Scitico Substation be expected to materially affect magnetic field levels at the boundaries of property the Scitico Substation is located on?
88. Would the proposed on-site collector substation or inverter/transformer pairs be expected to materially affect magnetic field levels beyond the boundaries of the (combined) subject property?

Environmental

89. Would the change to 400 Watt panels materially affect the "Life Cycle Greenhouse Gas Assessment" under Tab M of the Petition? If yes, please provide an update.
90. Is the EPA Greenhouse Gas Equivalencies calculations provided as response to Council interrogatory number 45 based on the current 400 Watt panel configuration? If no, please provide updated calculation sheets if necessary.

91. Provide the post-construction percent developed Critical Terrestrial Habitat area.
92. Referencing page 2 of the Connecticut Department of Energy and Environmental Protection (DEEP) comments dated November 28, 2018, does Nutmeg have any proposed best management practices to maintain the proposed berms? If yes, please summarize such best management practices.
93. Under Tab O of the Petition, DEEP notes that it concurs with the best management practices included in the July 27, 2018 Herpetofauna Avoidance and Mitigation Plan (July 2018 HAMP) that will be implemented to protect state listed amphibians and reptiles from project impacts. Under Tab D of the Petition, Nutmeg has included its "Herpetofauna Avoidance and Mitigation Plan" dated October 2, 2018 (October 2018 HAMP). Is the October 2018 HAMP the same or substantially the same as the July 2018 HAMP that DEEP refers to? If no, explain how and why the plan changed or was updated.

Decommissioning Plan

94. Page 4 of DEEP's comments dated November 28, 2018 note that, "[T]he decommissioning plan does not specifically state the land will be returned to a state capable of supporting agricultural use." Please respond to this DEEP comment. What are Nutmeg's plans for the subject properties at the end of the useful life of the facility?