

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051 Phone: (860) 827-2935 Fax: (860) 827-2950 E-Mail: siting.council@ct.gov www.ct.gov/csc

VIA ELECTRONIC MAIL

October 4, 2019

Carrie Larson Ortolano, Esq. Associate General Counsel Lodestar Energy, LLC 40 Tower Lane, Suite 145 Avon, CT 06001

RE:

PETITION NO. 1380 – LSE Delphinus, 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 1.992-megawatt AC solar photovoltaic electric generating facility on approximately 9.86 acres located generally east of Powder Hill Road north of the intersection with Monroe Road and Abbe Road in Enfield, Connecticut and associated electrical interconnection.

Dear Attorney Ortolano:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than October 25, 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.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the October 25, 2019 deadline.

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/RM/emr

c:

Jeffrey J. Macel, Lodestar Energy, LLC



Petition No. 1380 Lodestar Energy- Enfield Interrogatories - Set One October 4, 2019

Project Development

- 1. Referring to the Petition p. 3, what is the length of the power purchase agreement for the ZRECs purchased by Eversource? Has PURA approved the standard contract for the power purchase agreement?
- 2. Referring to the Petition p. 3, what alternating current megawatt output is under contract for use by both the Town of Enfield and the Town of East Windsor (Towns)? Is all of the power being produced by this facility being sold to the Towns? If not, where will the excess power be sold?
- 3. Is the alternating current megawatt capacity of the facility fixed at a certain amount per the PPAs? Is there an option within the PPAs to allow for changes in the total output of the facility based on unforeseen circumstances?
- 4. If a battery unit is installed in the future, would the terms of the PPA be affected?
- 5. If the PPAs expire and are not renewed and the solar facility has not reached the end of its lifespan, will the Petitioner decommission the facility or seek other revenue mechanisms for the power produced by the facility?
- 6. Could the project being designed to serve as a microgrid?
- 7. Would the petitioner participate in the ISO-NE Forward Capacity Auction? If yes, which auction(s) and capacity commitment period(s)?

Site Components

- 8. Is any wiring for the panels installed on the racking? If such wiring is external, are there any concerns regarding potential damage from weather exposure, vegetation maintenance, or animals?
- 9. Petition p. 6 mentions ballast foundations for the perimeter fencing whereas the site plans show pier foundations. Please clarify.
- 10. The Petition Site Plan includes a concrete pad for a potential future battery. At what time would the Petitioner determine if a battery is viable for this Project?

Interconnection

- 11. Petition p. 6 describes transmission lines and a transmission line tap whereas p. 9 describes an interconnection to Eversource's distribution system. Please clarify.
- 12. What is the status of the Eversource interconnection agreement?
- 13. What is the output (MW AC) at the point of interconnection?

Energy Production

- 14. What is the efficiency of the solar panels?
- 15. Would the power output of the solar panels decline over time? If so, estimate the percent per year.
- 16. Is the project designed to maximize annual energy production or peak load shaving?
- 17. What is the projected capacity factor (expressed as a percentage) for the proposed project?
- 18. Petition p. 6 states the owner of the property would continue gravel operations for one year after construction. Would dust from gravel operations affect the output of the site?

Public Safety

- 19. Would the project comply with the National Electrical Code, the National Electrical Safety Code and applicable National Fire Protection Association codes and standards?
- 20. Referring to Petition p. 21, what is the status of the FAA filling?
- 21. Referring to Petition Tab 4 (O&M Plan), where is the O&M Manager based?
- 22. With regard to emergency response:
 - a. Would the Petitioner conduct any outreach and/or training to local emergency responders regarding site design and the site shut-down procedures listed in the Petition O&M Plan?
 - b. How would site access be ensured for emergency responders?
 - c. In the event of a brush or electrical fire, how would the Petitioner mitigate potential electric hazards that could be encountered by emergency response personnel?
 - d. Could the entire facility be shut down and de-energized in the event of a fire? If so, how?

Environmental

- 23. What is the Town of Enfield's Wetland setback/buffer area? What does the green color represent on the Town's Wetland map provided in Petition Tab 15?
- 24. Please provide the Wetland Report mentioned on Petition p. 15.
- 25. Referring to Petition p. 14, what is the status of the Petitioner's response to DEEP's Natural Diversity Database review letter dated September 5, 2019?
- 26. Although the parcel is used as a gravel quarry, does the proposed site contain any Connecticut Prime Farmland Soils, as mapped by the Natural Resource Conservation Service? If so, provide the acreage of prime farmland soils within the solar field areas.
- 27. Would the residential property across from the existing/former gravel operation access drive have direct views of the solar facility?
- 28. Petition p. 19 states evergreens would be installed near the access road to provide visual screening. Indicate the type of evergreens and their location on the site plan.

- 29. The Site Plan indicates that the Scantic River State Park abuts the site to the northeast. Would there be any visibility of the solar facility from park trails?
- 30. Petition p. 19 states existing dense vegetation surrounds the Project site. Is most of this vegetation on surrounding properties?
- 31. Would site topography limit views of the facility from surrounding areas? Please explain.
- 32. Petition p. 6 states the landowner would continue gravel operations at the site for one year after completion of site construction. Where on the parcel would the gravel operation occur? How would that area be accessed? Would additional site clearing be necessary for this gravel operations/access, and if so, would clearing increase the potential for site visibility?

Facility Construction

- 33. How would the posts (that support the racking system) be driven into the ground? In the event that ledge is encountered, what methods would be utilized for installation? Will blasting be required to install any site infrastructure? If not, what methods would be used if bedrock is encountered?
- 34. Petition p. 8 and Site Plan Sheet 4 mention grading- Is grading proposed for the site? If so, provide a final contour plan.
- 35. Petition Site Plan Sheet 5 mentions topsoil stock piles. Where would the stockpiles be located?
- 36. Petition Site Plan Sheet 6 shows a Cement Truck Washout Area. Where would the washout area be located?
- 37. Has the Petitioner discussed the Project with the DEEP Stormwater Division? If so, when? Does the Petitioner intend to submit an application for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities to DEEP? If so, at what time?
- 38. Petition p. 14 states the site would be seeded with a pollinator mix. Does this selected mix include shade tolerant species to allow for growth in areas shaded by the solar panels?

Facility Maintenance

- 39. The Petition O&M Plan mentions monitoring of vegetation outside of the solar field perimeter fence. What is the anticipated frequency of clearing in these areas and how would clearing be accomplished if stumps are to remain?
- 40. Would pesticides or herbicides be used at the site? If so, specify anticipated products and use.
- 41. Would there be periodic cleanings of the solar panels to remove dust that may accumulate from gravel operations, and if so, would chemicals be used?