STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: HEXAGON ENERGY, LLC : PETITION FOR DECLARAORY : JUDGMENT :

DOCKET NO. 5060

HEXAGON ENERGY, LLC'S <u>RESPONSE TO</u> <u>COMMISSION'S DATA REQUESTS</u>

(SEPTEMBER 2, 2020)

Please provide written testimony supporting the factual representations and arguments in the Petition for Declaratory Judgment. Within the testimony answer the following questions and provide attachments to the testimony for questions asking for documentary evidence.

1. Describe the parcels where the solar projects are proposed to be located and attach copies of maps and diagrams showing the layout, configuration, and location of the two solar facilities, including the location of pre-existing parking lot(s) and any buildings on the site, as well as the boundaries of the parcels owned by the petitioner. Attach an aerial photograph of the parcels. If none exists, please use the Google Maps satellite photo feature and print out a copy of a picture of the property to attach to the testimony.

RESPONSE: See Folder 1 for Town of Burrillville property cards and site layouts for the two parcels.

2. Identify the owner(s) of the two parcels of property where the projects are proposed to be located.

RESPONSE: Parcel 1 – Going Green Realty LLC Parcel 2 – Montigny Enterprises Inc

3. Describe the type of parking lot surface that exists today in the location proposed for the carport (i.e., is it gravel or some type of hard surface)?

RESPONSE: The current surface is comprised of hard packed dirt and limited gravel, similar to the customer parking surface for the Pool Pirate retail building on site and access road from Broncos Highway. Hexagon Energy, LLC ("Hexagon") anticipates minimal augmentation to the site area with pervious stone parking surface materials.

4. Identify the owner(s) of the trucks that are parked or are planned to be parked on the parking lot.

RESPONSE: It is Hexagon's understanding that the trucks on the property belong to Northwest Trucking LLC, a venture owned by the property landowner.

5. Are any of the trucks that are or will be parked on the parking lot electric vehicles?

RESPONSE: Hexagon is not aware whether any of the trucks are electric vehicles.

6. How long are trucks typically parked on the parking lot? For example, of the trucks parked on the parking lot as of the date of the filing of the Petition, how long were they parked on the lot?

RESPONSE: It is Hexagon's understanding that the trucks are used primarily for pool service/supply delivery as well as other seasonal delivery operations. Loading and unloading occurs offsite from the property and the trucks are stored onsite when not actively employed.

7. If the owner of the trucks is not the owner of the parking lot, please describe the general terms of the lease agreement that allows the trucks to be parked at the location and indicate whether it is in writing or an oral agreement.

RESPONSE: N/A, see response 4.

8. Identify any building(s) located on either property, the purpose(s) of the building(s), the building(s) owner, the nature of the business with which the building(s) are associated, and how far away the buildings would be from the proposed carport.

RESPONSE:

No buildings on Parcel 2, Lot 012 See Folder 1 for town property card for Parcel 1, Lot 011. There is one main building that serves as a pool retail service store. This building is approximately 175 feet away from the nearest point of the proposed carport location.

9. Why did the Petitioner choose to limit the size of the CRDG Commercial Solar facility to 991 kW?

RESPONSE: The size of solar facility is limited by the allowable lot coverage set by a local solar ordinance at the time of design.

10. Could the property, Lot 012, have reasonably accommodated a CRDG Solar facility that was 1 MW or greater? How large of a CRDG Solar Facility could the property have realistically accommodated, physically?

RESPONSE: No. Due to the Town of Burrillville's 20% tree clearing limitation for solar arrays, the approximate 4.4 acre site layout is the maximum allowed on the property. Additionally, the unique shape of the property and emphasis from local planning and zoning officials on maintaining the current vegetative buffering for abutter viewsheds restrict the site size and location. See Folder 1 for layout.

11. How close are both of properties, Lot 012 and Lot 011, to other distribution customers on that National Grid's distribution system?

RESPONSE: See Folder 11 for identified abutters to each property. Hexagon assumes most of these properties are National Grid customers but does not have access to that information.

12. Is there any physical limitation on the property of the proposed carport, Lot 011, that requires the Petitioner to build a carport instead of building more ground-mounted solar?

RESPONSE: The limited acreage on Parcel 1, Lot 011 and local lot coverage constraint make solar development impractical if not infeasible without the dual-usage quality of a carport. The landowner's ability to increase the utilization of the property was a key component in pursuing a project and would not have done so with the vastly limited scope of a comparable ground-mount project.

13. Is the gravel parking lot capable of supporting a facility that is greater than 1 MW? If so, why did the Petitioner limit the size of the carport to 991 kW?

RESPONSE: No, see response 9. The maximum lot coverage for solar arrays within the Town of Burrillville at the time of project design restricts supporting a larger facility.

14. Did the Petitioner choose to site two separate projects instead of one larger project in order to have each project fall under smaller-size project classifications under REG program?

RESPONSE: No. The size of each project reflects the local land development constraints to include property boundary setbacks and lot coverage maximums. Additionally, the nature of the currently existing trucking business on Parcel 1 (Lot 11) makes the dual-use nature of carport desirable whereas such use would not be feasible on Parcel 2 (Lot 12).

15. Has financing been obtained and/or construction commenced for the CRDG Commercial facility? If so, when did it occur? If not, what is the schedule for obtaining financing and commencing construction?

RESPONSE: Financing has not yet been obtained nor has construction commenced. Hexagon is anticipating financing to be obtained between Q4 2020 and Q1 2021. Hexagon anticipates construction to commence in Q2 2021.

16. Please identify the number of customers enrollments that Superior Solar has secured.

RESPONSE: Hexagon has not yet begun enrolling National Grid subscribers for Superior Solar.

17. Identify which class Superior Solar bid into and which class Semistream Solar intends to bid into.

RESPONSE:

Semistream Solar intends to bid into the Commercial-Scale Solar (251-999 kW DC) + Solar Carport Incentive (Parcel 1).

Superior Solar bid into, and was awarded a certificate of eligibility in, the CRDG Commercial Solar (251-999 kW DC) (Parcel 2).