

**From:** Noah Siegel <[NSiegel@truegreencapital.com](mailto:NSiegel@truegreencapital.com)>  
**Sent:** Thursday, September 17, 2020 5:49 PM  
**To:** Dryden Town Supervisor Jason Leifer <[supervisor@dryden.ny.us](mailto:supervisor@dryden.ny.us)>; Ray Burger <[rburger@dryden.ny.us](mailto:rburger@dryden.ny.us)>  
**Cc:** Ilias Garidis <[IGaridis@truegreencapital.com](mailto:IGaridis@truegreencapital.com)>  
**Subject:** Response to TGM and Additional Info on PSC

Hi Jason,

Attached are additional details from LaBella to respond to TG Miller's requests for clarification. Further, a number of questions came up yesterday onsite when we hosted a few members of the Town Board and Planning Board. We have also addressed these in the letter.

In regards to your question about State regulations, the **New York State Public Service Commission** issues the Standard Interconnection Requirements, which sets the safety and reliability requirements for the utilities. The [Standard Interconnection Requirements \(SIR\)](#), is an overarching document that governs the utilities in New York's safety and reliability standard as well as outlining interconnection customer obligations. For example, there are safety standards such as the project "installing external, manual, visible disconnect switches between generating systems" between the project and the grid to protect utility residential and commercial customers in the area, utility personnel, as well as the project itself.

Given the differences across utilities and projects, the PSC provides in the SIR, ***"The need for additional protective functions shall be determined by the utility on a case-by-case basis"*** In this case, per NYSEG's communication that has been shared, they require the Recloser, which is an automatic disconnect switch that protects the community and the project. We have integrated NYSEG's requirements for pole mounted equipment into the shared plans. Further, the utility must "tap" the street line and in this case, all taps are located on the private property, rather than having three taps along George Road.

We look forward to being on the meeting this evening to meet with you and the Town.

Noah

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September 17, 2020

Jason Leifer, Supervisor  
Town of Dryden  
93 East Main Street  
Dryden, New York 13053

**RE: Solar Photovoltaic Plants  
2150 Dryden Road  
Dryden-Tompkins Solar II, LLC  
Response to Revised Interconnection Review by T.G. Miller, P.C.**

Dear Supervisor Leifer:

I have received and reviewed the Review Letter from T.G. Miller, P.C. and have the following response and requested information.

1. Attached is a SWPPP Modification Report that describes the interconnect site work and Identifies the Sediment and Erosion Control practices of the area. The original Sediment and Erosion Control plan for the project included silt fence and vegetation maintenance for the area.
2. The new access drive for the interconnection area is required by NYSEG for access to the NYSEG equipment and will be installed as a limited use pervious access road, which meets NYSDEC requirements, so there will be no additional impervious surfaces added to the site.
3. The final design has a single underground electrical trench that will carry the Medium Voltage Underground electrical lines in conduit for each of the three systems, which will be constructed to the outside of the fence with risers on each of the lead poles for the overhead electrical over the stream. There are no overhead electrical lines within the arrays.
4. NYSEG has already cleared the trees on the bank and there is no further clearing required for NYSEG. Clearing on site at the creek crossing will be required for the overhead electric.
5. NYSEG has installed all poles that will be required along George Road.

Following a site visit by members of the Town Board and the Planning Board on September 16 several additional questions were raised and are addressed here.

1. Are there any DEC permit requirements for the poles and crossing needed here? There are no DEC requirements for an overhead crossing of Virgil Creek as long as there is no disturbance of the stream bank or bed.
2. Are there any approvals required for the utility poles in the Flood Plain? Is there a deeper embedment required for poles required in the flood plain? The installation of utility poles in the flood plain do not obstruct flow and there will be no fill in the flood plain to reduce the flood plain capacity. No additional embedment depth is required.
3. What is the distance from the stream to the closest poles on the South and North Side? The nearest pole on the South Site is 101 feet from the mapped Centerline of the stream and is at least 75 feet from the top of bank, and the nearest pole on the north side is approximately 59 feet from the mapped centerline and at least 30 feet from the top of bank
4. What is the clearance between the poles and the tree line? Is it wide enough for standard farm tractor and farm equipment? The minimum distance between the south line of poles and the tree line is 25 feet and the clearance at the North East corner post is approximately 31 feet, which is adequate for standard farm equipment.



5. What is the acreage of tillable land in the field and the acreage to be used for poles? The total tillable acreage is approximately 6.3 acres and the utility poles will occupy 0.7 acres, resulting in an area of 5.6 acres of tillable land in the field.

Respectfully submitted,

**LaBella Associates**

Daniel R. Walker PE  
Senior Project Engineer

September 16, 2020

**RE: Solar Photovoltaic Plants  
2150 Dryden Road  
Dryden-Tompkins Solar II, LLC  
SWPPP Modification Report**

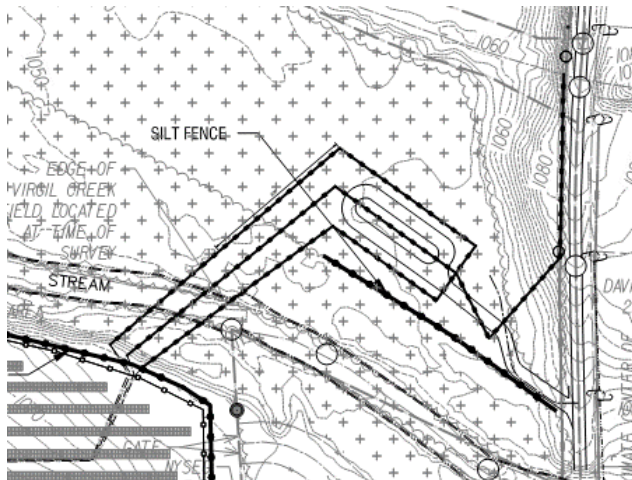
The Storm Water Pollution Prevention Plan for this project was submitted in June of 2017 and Revised May 2018.

The final electrical design has been designed to meet New York State Public Service Commission and the utility, New York State Electric and Gas, requirements. The final design consists of three electrical systems each with a six-pole configuration.

The access drive has been designed as a limited use pervious access road meeting NYSDEC requirements, so there will be no additional impervious surfaces added to the site. NYSEG requires that a stabilized access drive be provided to access the three sets of poles.

During the final electrical design of the project, three electrical lines were designed and it was determined that using overhead electrical lines over the creek would avoid any disturbance of the stream banks or bed. To provide NEC required clearances the poles lines must be a minimum of 30 feet apart and tree clearance must be at least 25 feet from the outside pole lines. This results in a minimal cleared width of 90 feet and a cleared area at the creek of 0.9 acres.

The Sediment and erosion control plan shows silt fence between the access road and the stream. (see figure 1) and the existing meadow vegetation will be maintained between the pole line and the wooded streambank.



**FIGURE 1**