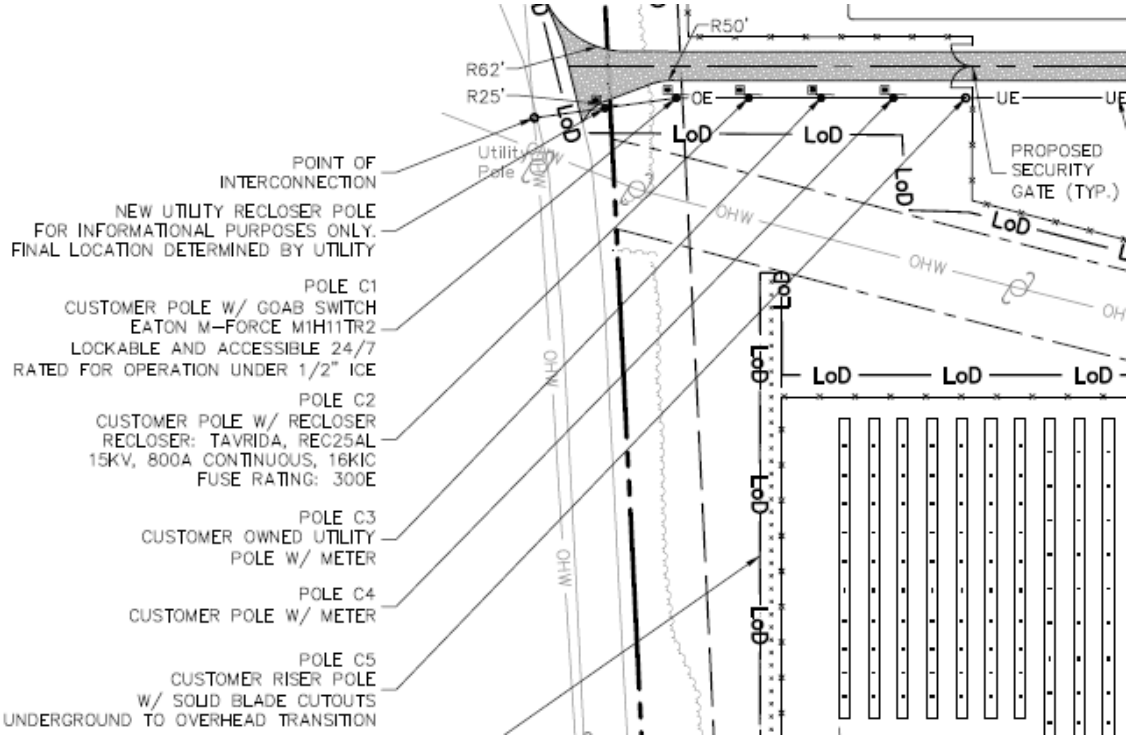
Chairman Joseph Lupia
Town of Manlius Planning Board
March 29, 2023

Dear Chairman Lupia and Members of the Planning Board:

As you know, Cypress Creek appeared before the Planning Board on February 13, 2023, with respect to certain field changes to a solar facility previously approved on May 23, 2022. At that meeting, the Planning Board requested that we provide a more detailed explanation as to the feasibility of converting the POI electric pole-line up into underground wiring given the proposed reduction in pole-to-pole distance from 50ft to 40ft. Please allow this correspondence to serve as a response to the Planning Board's concerns raised at that meeting.

Review of Project History:

On May 23, 2022, the Town of Manlius Planning Board issued a Site Plan Approval decision to Meltwater Solar, LLC. Drawings submitted as part of Meltwater's application had assumed the following "Point of Interconnection" or "POI" design:



On July 19, 2022, Meltwater Solar, LLC conducted a site visit with National Grid representatives to confirm final locations for the POI installation. This site visit instead resulted in Meltwater Solar, LLC receiving the following feedback from the utility:

1. ***The overall proposal will work.***
    1. ***National Grid will set a midline pole across the street to feed the site. Note: Should this pole/anchor need to be placed on 3rd party property, the developer will be responsible to obtain the easement/ROW.***

2. ***The pole line up needs to be a minimum of 10 feet off the access road.***
    a. ***Developer will update the site plan to incorporate this distance.***

3. ***National Grid Recloser pole location TBD. National Grid wants to make sure this pole is on the developer's property as well as outside the swale and requires the following:***
    a. ***Developer is going to locate the existing town ROW from centerline on street to their property.***
    b. ***Once National Grid determines the location of the recloser pole, all poles after that pole will be 50 feet apart.***

4. ***Developer to resubmit site plan with changes for review.***

On October 12, 2022, Meltwater Solar, LLC submitted a revised site plan (POI diagram shown below) to National Grid, which was subsequently accepted and approved for the development of a utility easement ahead of construction.

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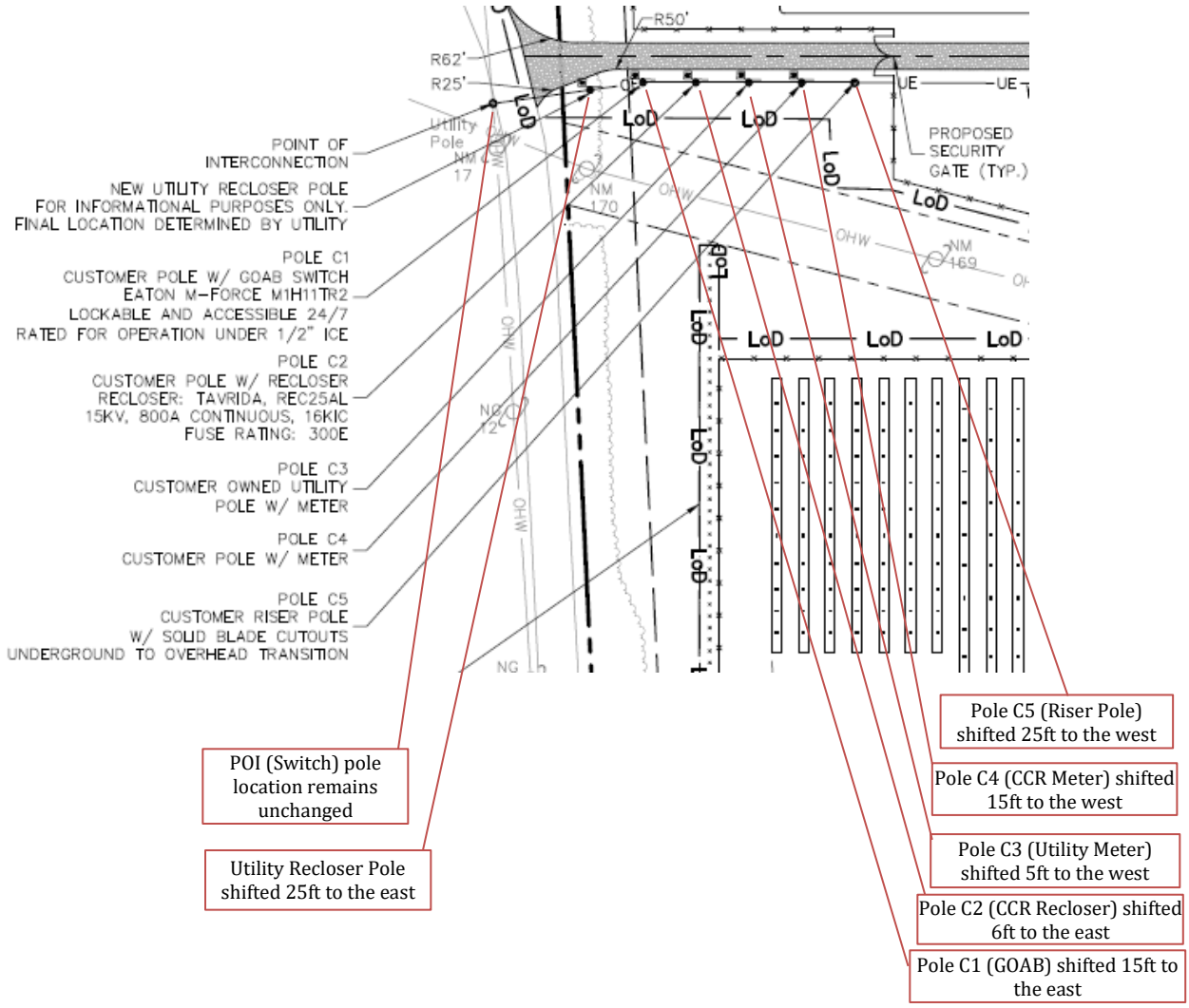


Note: Because Point #3a required shifting the utility recloser pole 25ft to the east to avoid the town ROW, there was not enough room between the first pole in the POI lineup and the project fence. As a result, the pole-to-pole spacing for the six poles to the east of Kirkville Rd was reduced from 50ft to 40ft. National Grid was accepting of this change given the site constraints (see separate attachment for email confirmation).

On January 13, 2023, Meltwater Solar, LLC notified the Town of Manlius of these field changes. The Town of Manlius subsequently requested that Meltwater Solar, LLC attend their February 13, 2023, Planning Board meeting to review these changes in more detail. At this meeting, Meltwater Solar, LLC provided a side-by-side comparison of the new vs. old POI design (included as Appendix A) and fielded several questions from Planning Board members. At the end of the

meeting, the Town Planning Board requested that Meltwater Solar, LLC return with a more detailed explanation as to the feasibility of moving all wiring at the front of the site underground, to mitigate the Planning Board's aesthetics concerns of having these poles spaced too closely together.

Below is Meltwater Solar, LLC's response to such an inquiry:

At a high level, the central goal of the Point of Interconnection ("POI") design is to ensure that the local utility has safe and convenient access to a certain set of standardized equipment that will allow them to:

1. Keep track of (or "meter") the amount of electricity generated or consumed, and
2. Disconnect the facility (for either emergency or maintenance purposes).

Given these dual priorities of safety and convenience, it should not come as a surprise that POIs are often pole-mounted and as close to the public ROW as possible.

Though there may be an option to pad-mount some of this equipment, it is generally not recommended for the following reasons:

1. <u>Pole-mounted equipment is the industry standard, and as such, the lead times to procure, build and maintain it are significantly shorter than for pad-mounted equipment.</u>
    - This is of particular concern to Meltwater Solar, LLC, as National Grid has warned that any further changes beyond what they had requested following the site visit will put the project at risk of not being able to interconnect this year.
2. <u>Using industry-standard equipment mitigates the impact of operational malfunctions.</u>
    - If the interconnection equipment needed replacement, pole-mounted equipment would usually be readily available in the utility's inventory, as it is the industry standard. Pad-mounted equipment, on the other hand, is custom-made, and as such, involves significantly longer lead times to be delivered. This presents a risk that the solar facility could shut down for months in the event of an equipment malfunction in a pad-mounted POI lineup.

3. Pole-mounted equipment takes up less space and blends in with existing infrastructure.

    - This is a notable consideration, particularly in Meltwater's case, where there is already an existing sub-transmission line that cuts diagonally across the property. It is also important to note that, to the untrained eye, these poles will look very similar to the existing overhead utility poles that run parallel to Kirkville Road. This contrasts with a pad-mounted POI scenario in which each piece of equipment would require its own concrete pad, which would be secured from public access either via steel encapsulation or by perimeter fencing. To the untrained eye, this would resemble a series of commercial-grade backup generators at the site's entrance.

4. Pole-mounted equipment is less impactful from a stormwater perspective.

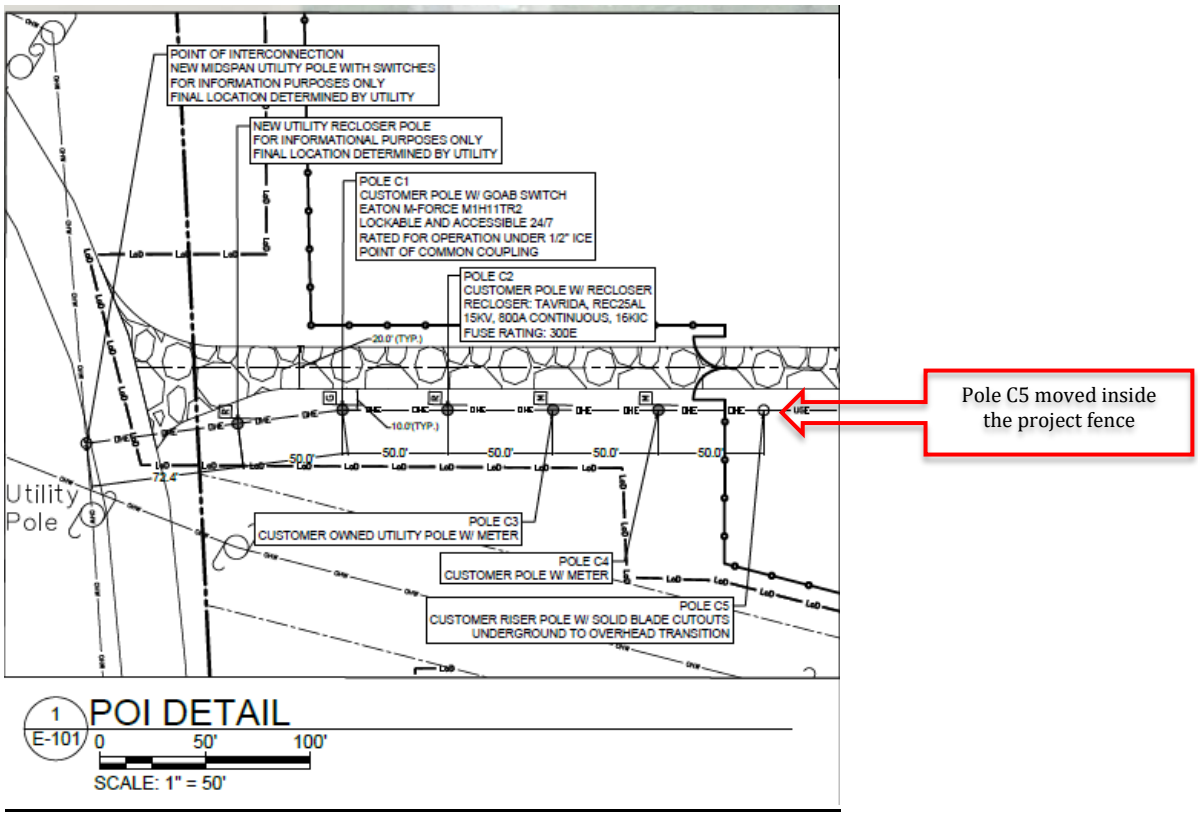
    - As discussed above, the only alternative to pole-mounted equipment is pad-mounted equipment. As the terminology suggests, this requires mounting the same interconnection equipment on a concrete pad, which would result in an increase of impervious surface.

    - Moreover, the addition of new impervious surface would invalidate previous stormwater calculations that had been incorporated into Meltwater's Stormwater Pollution Prevention Plan (SWPPP), and cause need for further analysis. This could result in construction delays and poses a threat to Meltwater's ability to be commissioned before the end of the year.

In addition to these general concerns, there are also project-specific concerns with changing Meltwater's POI design to use ground-mounted equipment, as it would make the project vulnerable to supply chain risks, which in turn are expected to translate into material construction delays. Please see the email correspondence with National Grid (provided separately), in which National Grid provides confirmation that a change to ground-mounted equipment would delay the construction timeline.

Proposed Solution: Given the above considerations, Meltwater Solar, LLC proposes restoring the 50ft pole-to-pole distance that was originally approved by the Planning

Board. This can be achieved by moving Pole C5 inside the fence and moving eastward the remaining poles to the east of the Utility Recloser Pole, as shown below. This would mitigate the aesthetics concerns prompted by the revised POI design presented at the February 13, 2023 meeting, while still adhering to National Grid's requirement to move the Utility Recloser Pole outside of the ROW.



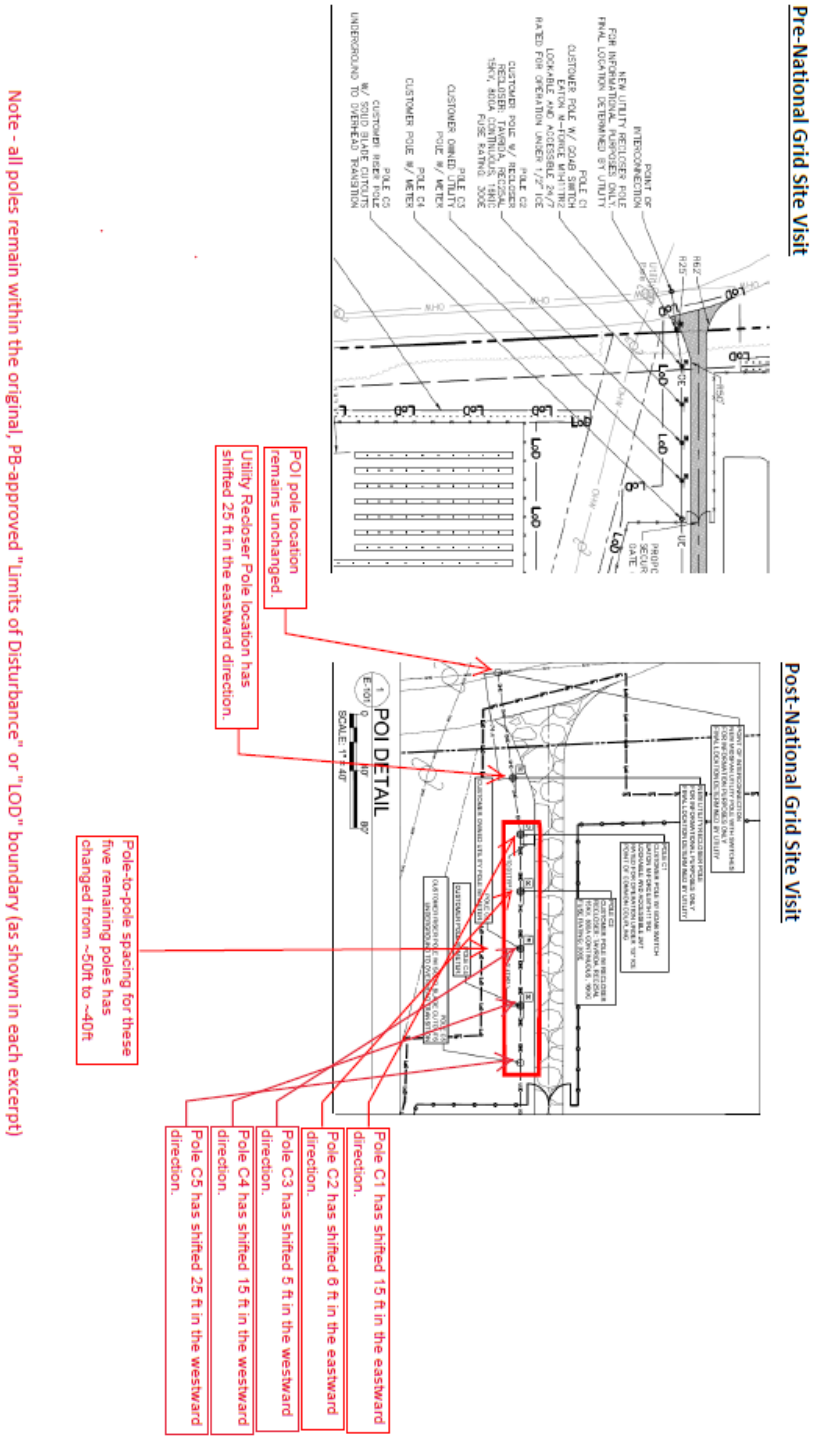
Meltwater Solar, LLC respectfully requests that the Town of Manlius Planning Board consider all the above factors and allow for the project to proceed with this newly revised POI design.

Please let us know if you have any further questions or concerns.

Sincerely,

Bernardo Urdaneta

Appendix A


Pre-National Grid Site Visit
Post-National Grid Site Visit
POI DETAIL
POI pole location remains unchanged.
Utility Recloser Pole location has shifted 26 ft in the eastward direction.
Pole-to-pole spacing for these five remaining poles has changed from ~50ft to ~40ft
Pole C1 has shifted 15 ft in the eastward direction.
Pole C2 has shifted 6 ft in the eastward direction.
Pole C3 has shifted 5 ft in the westward direction.
Pole C4 has shifted 15 ft in the westward direction.
Pole C5 has shifted 25 ft in the westward direction.
Note - all poles remain within the original, PB-approved "Limits of Disturbance" or "LOD" boundary (as shown in each excerpt)