

267 Water Street
2nd Floor
Warren, Rhode Island 02885
401.889.2373

May 19, 2020

Town of Bristol | Planning Board

Re: Bristol Landfill Solar Narrative

To Whom it May Concern,

NuGen Capital Management is pleased to work with the Town of Bristol to present a plan to produce renewable energy from an approximately 4.98MW AC solar project at the Town's closed Landfill on Minturn Farm Road. NuGen holds itself and its partners to the highest standard of excellence in every aspect of its business, ranging from engineering and finance to equipment and field operations. Founded in 2009 and based in Rhode Island, NuGen has a strong, stable and successful track record. Specifically, NuGen owns over 50MW of operating solar farms, has over 40 power purchase agreements with public and private off-takers, owns over 500 acres of land and conducts its own asset management and performance optimization. As an investor and long-term owner of the assets it develops, NuGen is passionate about the importance of delivering high performance and reliable solar projects.

The Bristol Assessor's Office identifies the previously developed Site as Lot 171-25 with a total land area of 91.54 acres. The area within the Site is zoned as Open Space (see attached Zoning Figure) and the land use is municipal consisting of the landfill itself, the wastewater biosolids and yard waste composting operations and the town's Transfer Station. FEMA classifies the area as Zone X, which is determined to be outside of the 500-year flood. Proposed facility components and associated work will take place outside of nearby wetland areas and their associated buffer zones.

The solar array will be constructed using a ballasted system to minimize disturbances to the landfill cap. From the surface, the cap consists of a 12-inch vegetative support layer, a non-woven geotextile, a 12-inch drainage layer, a geosynthetic clay liner and a 6-inch bedding layer. There will be no significant increase in impervious area or land disturbance/excavation on top of the landfill. Proposed impervious areas will be limited to the small pads beneath transformers and other electrical equipment. The resulting post-development peak flow rates and runoff volumes are anticipated to be approximately equal to the pre-development rates. Existing stormwater management consisting of country drainage via the vegetation of the landfill, earthen diversion berms with underdrains and drainage swales will remain in place. No additional flows beyond the existing conditions will be introduced to the property, and no new discharges will be implemented to the surrounding areas.

NuGen is currently seeking project approval from the Rhode Island Department of Environmental Management (RIDEM) and is requesting to postpone the requirement to present RIDEM approval until the Final Plan Meeting as it is still in process. Based on our conversations with RIDEM to date, we do not expect any issues with that process. Within the next three weeks we will be submitting an engineering report to RIDEM that will include a structural evaluation of impacts on the cap from the ballasted anchoring system, a

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stormwater control plan, if deemed necessary, and an operations and maintenance plan that will discuss maintenance and protection of existing landfill components, safeguards/alarms incorporated into proposed electrical systems and site security. Our understanding is that the approval from the combined Master/Preliminary meeting would be conditional upon project approval from RIDEM.

Please note that NuGen has retained BETA Group, Inc. (BETA) to assist with the local permitting process. BETA has been performing landfill related services on behalf of the Town since the early 1990s. Accordingly, they have extensive knowledge of the landfill having designed all phases of landfill closure, the Town's composting facility and transfer station. They also have a strong understanding of Rhode Island's environmental regulations.

In addition, we would like to clarify the following required details of this submission as per the Land Development Checklist and Ordinance Reference 28-286.

1. Financial Surety (that satisfies Section 28-289a) | It is our understanding this requirement is not applicable to our project as per our negotiations with the Town of Bristol during the RFP
2. Stamped Plans (that satisfies Section 28-289 1) | Plans have been stamped as required.
3. Demonstration of Circulation (that satisfies Section 28-288e) | We have spoken to the Fire Chief and he has agreed to review our request for 20' road at the entrance to the top of the hill and then a 10' road around the west and north side to the turn around. Additionally, no additional parking will be added as we expect very limited to no traffic to the site on a daily basis due to this being a solar facility.
4. Lighting Plan (that satisfies Section 28-288) | There will be no additional lighting added to the site.
5. Security of Facility (that satisfies Section 28-288j) | There will be a KNOXBOX installed at the entrance of the Solar Facility and the Fire Department and Department of Public Works will be provided the access information in the event of an emergency. Once the site is fully constructed, NuGen Capital will provide an onsite training session to the Fire Department to review emergency shut-off procedures. Aaron Rust, Director of Asset Management, will be the main point of contact for all site operations. His direct cellphone number is (859) 537-6149 and email is arust@nugencapital.com.
6. Site Plan Requirements (that satisfied Section 28-289 (b)) |
 - a. Post Installation Settlement Plan & Operations and Maintenance Plan | Please see the Operations and Maintenance Plan provided for more information on settlement upkeep and upkeep of facility and lands within fenced solar facility site.
 - b. Construction Schedule | Assuming approval is granted, we plan to commence construction Winter 2020 / Spring 2021. For more information, please see the GANNT chart provided within this application package.
 - c. Emergency Plan | The plan identifies where the shutoff location of the site is located. Additionally, as indicated above, we have a designated team member who will be the point of contact for site operations and emergencies. Aaron Rust, Director of Asset Management, will be the main point of contact for all site operations. His direct cellphone number is (859) 537-6149 and email is arust@nugencapital.com.
 - d. Insurance | Provided in this application package is proof of General Liability Insurance.
7. Development Plans (that satisfied the Land Development Checklist) |
 - a. Name and Address of Applicant and Property Owner | As noted within the provided plans, they are as follows|
 - i. Land Owner | Town of Bristol

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- ii. Applicant | NuGen Capital Management, LLC 267 Water Street, 2nd Floor Warren, Rhode Island 02885
- b. Temporary Improvements | No temporary improvements are being made to this site.
- c. Consultants | For this project team has contracted with the environmental engineering firm BETA Group, Inc. and electrical engineering firm Renua Energy to compile the enclosed document for review for a combined Master/ Preliminary plan.
- d. Coordination with Fire Department and Department of Public Works | NuGen Capital Management has been in touch and is continuing discussions concerning this project with the Fire Chief and Department of Public Works, to ensure all feedback will be reflected in this submission and the Final Plan.

If you should have any questions, please do not hesitate to contact me directly.

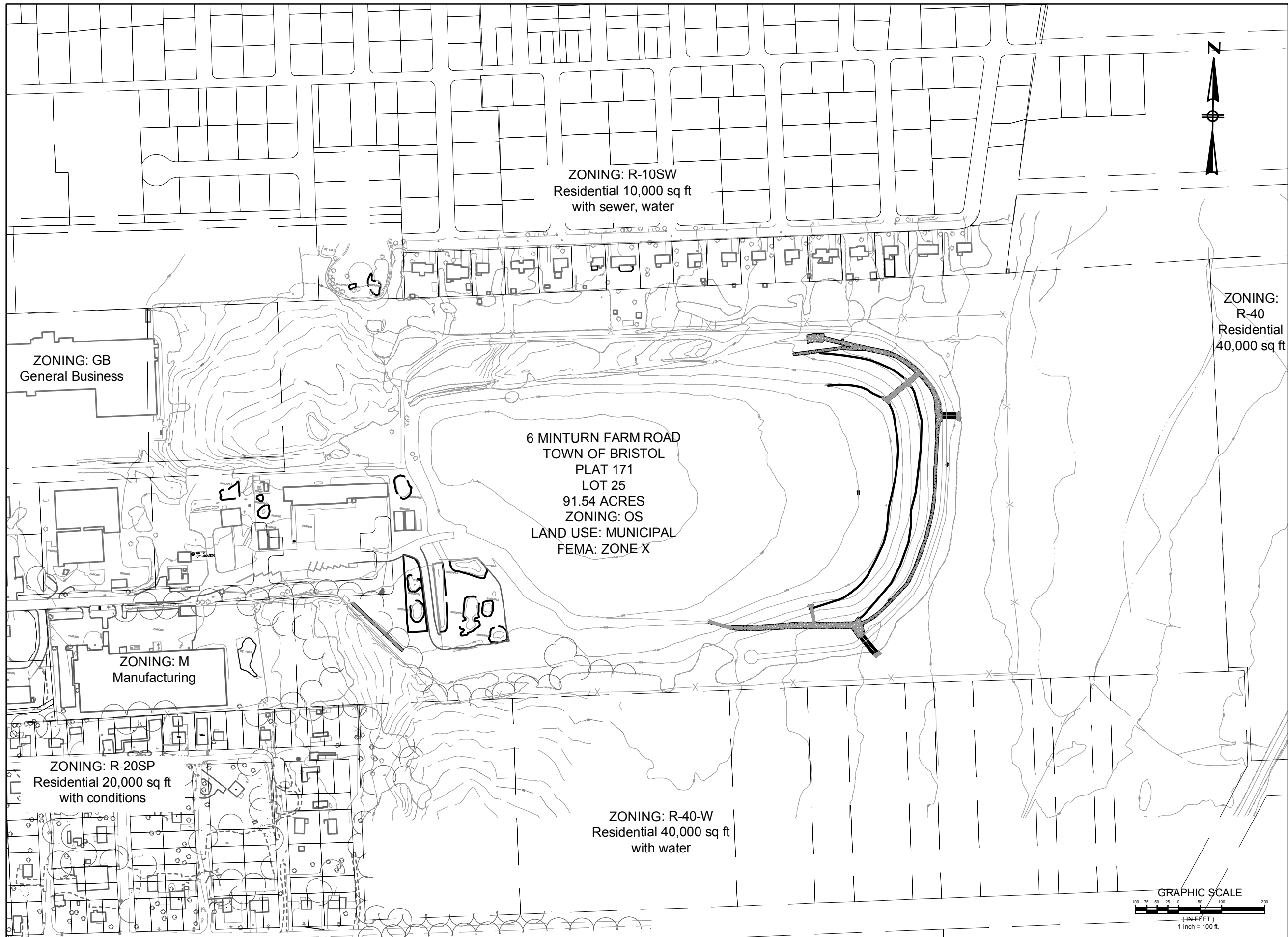
Best Regards,



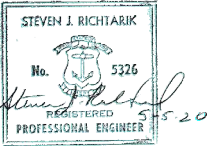
David Milner
Chief Executive Officer

Attachments
Zoning Figure

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PLANNING BOARD CHAIR DATE



REV	DESCRIPTION	DATE	CHK



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701 GEORGE WASHINGTON HWY.
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RENUA ENERGY, INC.
16 HUDSON AVENUE, UNIT 2731
GLEN FALLS, NY 12801
<http://www.renuenergy.com/>

DEVELOPER



NUGEN CAPITAL MANAGEMENT LLC.
267 WATER STREET
WARREN, RI 02885
<http://www.nugencapital.com/>

PROJECT NAME AND ADDRESS

BRISTOL LANDFILL SOLAR
MINTURN FARM RD
BRISTOL, RI 02809

SHEET TITLE

ZONING FIGURE

ENGINEER

SJR

DRAWN BY

JC

PROJECT NO.

6851

SHEET NO.

CREATION DATE

4/24/2020

SCALE

1" = 100'

C-100