



**Exhibit 20: Effect on
Communications**

Cider Solar Farm
Towns of Oakfield and Elba
Genesee County, New York

Matter No. 21-01108

EXHIBIT 20: EFFECT ON COMMUNICATIONS

Matter No. 21-01108

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Abbreviations

ISP

Internet Service Providers

NYCRR

New York Codes, Rules, and Regulations

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Glossary of Terms

Applicant	Hecate Energy Cider Solar LLC
Project	Refers to the proposed Cider Solar Farm, an up to 500-megawatt utility scale solar project that will be comprised of photovoltaic panels, inverters, access driveways, electrical collection lines, point of interconnection/substation, construction staging areas, fencing and plantings, located on private land in the towns of Elba and Oakfield, Genesee County, New York.
Project Area	Refers to the Project Site and surrounding/adjacent land totaling approximately 7,518 acres.
Project Footprint	Refers to the limit of temporary and permanent disturbance within the Project Site caused by the construction and operation of all components of the Project totaling approximately 2,452 acres.
Project Site	Refers to those privately owned parcels under option to lease, purchase, easement or other real property interests with the Applicant in which all Project components will be sited totaling approximately 4,650 acres.
Study Area	Refers to the area evaluated for specific resource identification and/or resource impact assessment. The size of this area is appropriate for the target resource and takes into account the project setting, the significance of resource or impact being identified or evaluated, and the specific survey distances included in Chapter XVIII, Title 19 of NYCRR Part 900. As appropriate, the Study Area for each type of survey or resource impact assessment is provided in the respective sections within the Application.

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The content of Exhibit 20 is provided in conformance with Chapter XVIII, Title 19 of the New York Codes, Rules, and Regulations (NYCRR) § 900-2.21, as follows.

a) Proposed Telecommunications Interconnection

There is no telecommunications interconnection proposed as part of the Project.

b) Existing Broadcast Communication Sources for Wind Facilities

The requirements of this section do not apply to the Project.

c) Existing Telecommunication Lines

Several publicly available databases were consulted to locate existing telecommunication facilities within a 1-mile radius of the Project Area (Study Area). These databases include the New York State (NYS) Office of Planning and Development Geographic Information Gateway, NYS GIS Clearinghouse, CUGIR (Cornell University Geospatial Repository), United States Geological Survey TNM Download, and Data.gov. Several data sources were obtained and are depicted on Figure 20-1: *Existing Telecommunications Facilities*.

No microwave service towers, antenna structures, or cable networks exist within the Study Area for telecommunications facilities; however, several public utility companies provide communication services within the Study Area, including Spectrum, Verizon, Viasat and HughesNet (In My Area 2021). According to the Genesee County Department of Planning's publicly available Web Map application, there are telephone and fiber optic communication lines located within the Project Area along Quaker Hill and Oak Orchard Roads in the Town of Elba. The Applicant contacted Genesee County on November 24, 2020, to confirm identification of these and other fiber optic lines, including possible connections to telecommunication towers. A response was received on November 24, 2020, wherein the County stated it does not hold complete sets of these data and was unable to confirm the present conditions related to the location of underground telecommunication lines (Genesee County 2020). The Applicant researched other publicly available databases and found no relevant information on the location of existing telecommunication lines relative to the Project Site nor Project Footprint.

The Project will be constructed in a manner that will avoid any impacts to underground cables or fiber optic lines. Before construction begins, the Applicant or its Contractor will submit a request for information with Dig Safely New York to locate and mark out buried utilities within the Project Footprint. The safety of all on-site personnel and the prevention of damages to existing/operating utilities is a top priority of the Applicant. The Applicant will avoid interference, or minimize interference where avoidance is not possible, through protection of buried utilities during construction and the selective use of trenchless crossing methods, and crossing existing utilities at 90-degree angles, where practicable.

d) Anticipated Electric Interconnect Effects

Anticipated impacts on existing communication systems as a result of the Project and electrical interconnection between the Project and point-of-interconnection are expected to be minimal and are discussed in Section (d)(1) through (d)(5) of this Exhibit. As discussed in Section (c), before construction

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begins, the Applicant will submit a request for information with Dig Safely New York to locate and mark all buried utilities within the Project Footprint.

1) Structures to Interfere with Broadcast Patterns

Due to the low profile of the Project components (maximum of 15 feet, except at the point of interconnection), there are no structures that will create significant interference with broadcast patterns.

2) Structures to Block Necessary Lines-of-Sight

The average height of the solar arrays will not exceed 15 feet. As a result, this Project is not anticipated to increase signal attenuation for microwave radio signal transmission.

3) Physical Disturbance by Construction Activities

The construction of the Project is not anticipated to damage buried or above ground communication facilities. Buried electrical collection lines may intersect buried utilities located along road frontages, which may include communication facilities. In accordance with 19 NYCRR § 900-6.4(f), prior to construction, the Applicant will notify Dig Safely New York to locate and mark buried utilities. As part of this process, relevant mapping will be provided to the Applicant by the utilities. The Project will avoid any impacts to underground cables or fiber optic lines through pre-construction planning and construction best management practices. During this process, the underground utilities will be located and include electric, gas, oil, steam, water, sewer, and communications lines. Dig Safely New York will respond to the request and either provide notification that the area is clear or will provide the locations of the utility facilities. The facilities are then marked above ground and will be avoided or protected during construction. If an underground facility cannot be avoided and needs to be exposed, the excavator will provide proper support and protection so that the facility is not damaged. Upon completion of work, the excavator will backfill around any exposed utilities.

4) Adverse Impacts to Co-Located Lines due to Unintended Bonding

Considering the measures to avoid impacts to existing utilities, the Applicant does not believe that there is significant potential for the proposed Project and buried electrical collection lines will adversely impact co-located or adjacent lines due to unintended bonding.

5) Other Interference Potential

Other potential for interference to communications systems is not anticipated as a result of the Project.

e) Sufficient Capacity to Support Project

The Project Site is currently serviced by cable-based internet (Spectrum) and wireless service providers. The Applicant will coordinate with internet service providers (ISPs) to establish a secure, encrypted broadband service line to service the substation and switchyard and temporary construction trailer, as needed. The Applicant will procure broadband service from a provider and the selected ISP will be responsible for evaluating capacity on the existing system and ensuring the procured broadband capacity

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is available. Any required system upgrades to the ISP's infrastructure to bring broadband service to the Project will be addressed through negotiations between the Applicant and the selected ISP.

f) Adverse Effects on Communication Systems

The Applicant conducted the review for the Project as well as the tap line and interconnection facilities and has determined that there will be no adverse impacts to communications systems.

g) Plans to Mitigate Impacts on Existing Communication Sources

There will be no significant adverse impacts from construction or operation of the Project on communication systems or telecommunication connections located within a one-mile radius of the Project Area. The Applicant will develop a Complaint Management Plan pursuant to 19 NYCRR § 900-10.2(e)(7) that will be utilized to address any issues. The Applicant will promptly investigate any complaints received. If the Applicant's investigation determines that the complainant has identified a problem attributable to the construction, operation, or maintenance of the Project, the Applicant will work directly with the complainant and the local municipalities (if appropriate) to resolve the identified problem.

h) Communications Interconnection Status

As discussed in Section (a) of this Exhibit, no telecommunications interconnection is proposed as part of the Project.

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References

Genesee County. 2020. E-mail communication between Stantec and Genesee County Department of Planning. November 24, 2020.

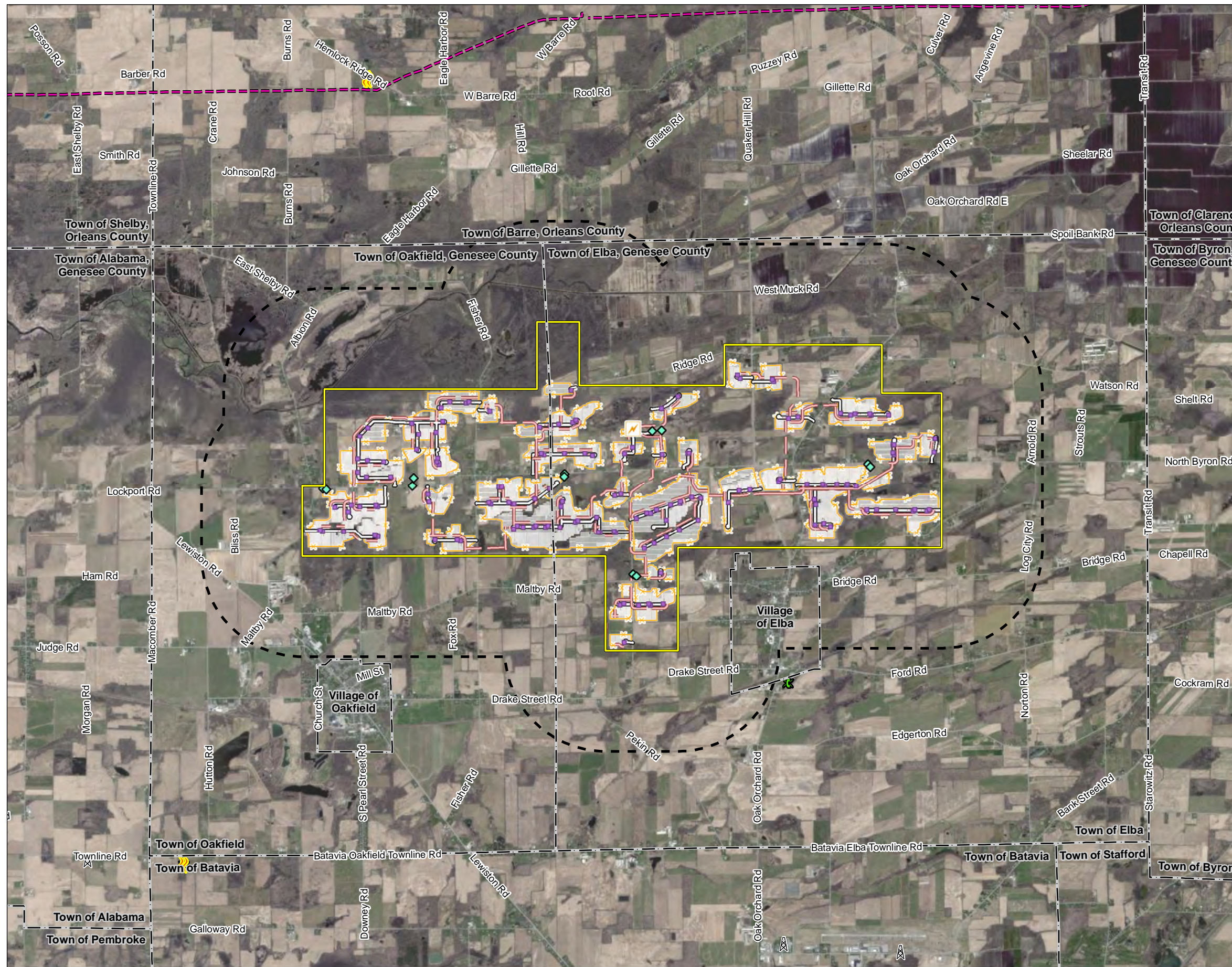
In My Area. 2021. Utility Providers by Zip Code. Available at: <https://www.inmyarea.com/utilities>. Accessed March 2021.

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FIGURES

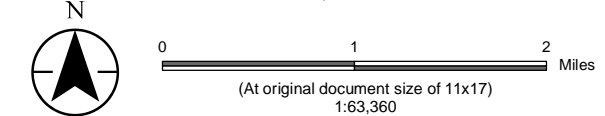
U:\1190502038\03_data\gis\mxd\Application\Exhibit20\Fig_20-1_Existing_Telecommunication_Facilities_CSF.mxd Revised: 2021-04-28 By: astapleton



Legend

- Project Area
- 1-mile Study Area
- Proposed Project**
- ⚡ Substation and Switchyard
- Inverter
- ◆ Laydown Area
- PV Panel Array
- Collection Line
- Access Road
- ✂ Fence Line
- Existing Features**
- Municipal Boundary
- Active Windstream Cable Network
- Communication Towers**
- ⇄ Microwave Service Towers
- ✳ TV Station Transmitter*
- 🗼 Antenna Structure Registrar
- ✳ Paging Transmission Tower*
- ✂ Cellular Tower
- 🗼 Land Mobile Broadcast Towers*

*No FM Towers, Land Mobile Towers, Paging Towers, or TV Station Transmitters within map extent.



Notes
 1. Coordinate System: NAD 1983 StatePlane New York West FIPS 3103 Feet
 2. Data Sources: Remediation Sites Boundaries; NYSDER (https://gis.ny.gov/gis/), NYS GIS Clearinghouse (https://gis.ny.gov)
 3. Background: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
 National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.



Project Location
 Towns of Elba and Oakfield
 Genesee County, NY

Prepared by AS on 2021-04-09
 TR by EE on 2021-04-09
 IR by NL on 2021-04-09

Client/Project
 Hecate Energy Cider Solar LLC
 Cider Solar Farm

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Figure No.
 20-1

Title
 Existing Telecommunication Facilities