



ALLCO RENEWABLE ENERGY LIMITED

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*Thomas M. Melone
President and
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June 24, 2021

Melanie Bachman
Executive Director
Connecticut Siting Council
Ten Franklin Square, New Britain, CT 06051
Via email: Siting.Council@ct.gov

RE: *PETITION NO. 1406A - Doosan Fuel Cell America, Inc. petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a grid-side 9.66-megawatt fuel cell facility and associated equipment to be located at 600 Iranistan Avenue, Bridgeport, Connecticut*

Dear Ms. Bachman,

Thank you for the acknowledgment of Allco Renewable Energy Limited's petition to intervene. I look forward to the Council's decision regarding the petition. In the interim, I am filing this letter in support of the public hearing request filed by Joseph Provey. As Mr. Provey stated in his June 18, 2021 request, there are many unanswered questions regarding the subject petition. Mr. Provey notes many such unanswered questions in his request.

Of particular concern to the Council should be the life-threatening hazardous driving conditions that the petitioner's expert, Trinity Consultants, concedes the project's continuous vapor plume would cause on I-95.

Assuming the results of the Trinity analysis have correctly determined that there is only on average one-hour per year of Total Plume-Induced Fog + Ice, that additional hour can in no way can be described as a negligible risk. The petitioner has offered no expert testimony regarding the hazardous conditions that extra hour per year would cause to unsuspecting drivers traveling at high speed on I-95.

I dare say that the Council has never encountered a project, such as this one, where the Council's approval may from statistical standpoint result in one or more accidents and possibly one or more fatalities on I-95 from hazardous driving conditions caused by the project itself. I, for one, would not want to be driving on I-95 during that extra hour per year.

During a meteorological event that causes snow, ice or fog, drivers are usually well aware of the possible hazardous conditions on I-95 because the event is widespread. Here, however, that would not be the case. The fog and/or ice caused directly by the continuous plume of vapor from the 21 fuel cell stacks would be a complete surprise to drivers. It would be especially hazardous at night when visibility is lower. Making matters worse, a southbound driver approaching the area of the fuel cell-caused ice and fog would be traveling at a high-speed and just coming out of a bend in I-95.

As the vehicle comes out of the bend, it is roughly only 2800 feet to the area of the fuel cell's continuous vapor plume. A vehicle traveling at 65 mph would reach the area in less than 30 seconds. If the fuel-cell vapor induced ice condition occurs at night, it seems as if there would be a high likelihood of an accident, again because the conditions would be completely unexpected.

Also, the Trinity report says nothing about the increase in severity of a meteorological induced ice and fog situation from the additional contribution of the continuous plume of vapor from the 21 fuel cell stacks.

We should not forget the many accidents that have occurred on I-95, especially those where fatalities have occurred, or those that melted the highway and closed it for weeks.¹ One hour of extra ice in conditions where it would be a complete surprise to drivers is more than sufficient to create a circumstance that could regularly lead to accidents and fatalities.

Please contact me with any questions.

Respectfully,

/s/Thomas Melone

Thomas Melone

Juris No. 438879

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¹ See, e.g., *Fiery Crash Closes Connecticut Highway For Weeks, A tractor-trailer carrying 9,000 gallons of fuel oil erupted in a spectacular fireball after striking a car on Interstate 95 Thursday night. "The road is completely on fire," said State Police Sgt. J. Paul Vance at one point. "The fire is out of control."* (March 26th, 2004), <https://www.firehouse.com/home/news/10521345/fiery-crash-closes-connecticut-highway-for-weeks>.