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May 20, 2021

Melanie A. Bachman, Esq.
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition 1406A – Provey Interrogatories

Dear Ms. Bachman:

NuPower Bridgeport FC, LLC (“NuPower”) hereby submits to the Connecticut Siting Council (“Council”) its Interrogatories for Intervenor Joseph Provey. Pursuant to the Council’s May 14, 2021 schedule, NuPower requests responses to the Interrogatories no later than June 10, 2021.

Given that the Council has waived all hard copy filing requirements as part of its response to the COVID-19 pandemic, by this letter, NuPower submits to the Council an electronic copy of its Interrogatories. A hard copy of the Interrogatories will be mailed to the Council.

Should you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosure

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STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Doosan Fuel Cell America, Inc. petition for a : PETITION NO 1406A
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, and associated electrical :
interconnection to the United Illuminating : May 20, 2021
Company's existing Congress Street Substation

INTERROGATORIES DIRECTED TO INTERVENOR JOSEPH R. PROVEY

The following Interrogatories from NuPower Bridgeport FC, LLC (“NuPower”) are in regard to the above-captioned Petition (the “Petition”) and the associated Project (as defined below) proposed by NuPower (the “Petitioner”). The term “Project”, as used herein means, the Petitioner’s proposed construction, maintenance and operation of a 9.66-megawatt fuel cell facility and associated equipment to be located at 600 Iranistan Avenue, Bridgeport, Connecticut (the “Site”), as described in the Petition. The term “You” and “Your”, as used herein means, Joseph R. Provey.

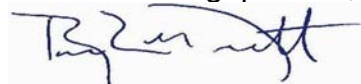
1. Reference Your March 2, 2021 Intervenor Status Request Form. Please provide a list of the members of the board of directors for Seaside Village.
2. Reference Your March 2, 2021 Intervenor Status Request Form. Please provide a photo of the Site taken from any location at 165 Flanders Street, Bridgeport, CT and provide a map showing the location from which the photo was taken.
3. Reference Your March 2, 2021 Intervenor Status Request Form. As a former editor of “national several [sic.] science and building design magazines”, do you agree that fuel cells are classified by Connecticut state law as a source of renewable energy in Connecticut and that as a distributed generation resource they displace grid CO₂ emissions?
4. Reference Your March 2, 2021 Intervenor Status Request Form and Your April 10, 2021 email to Melanie Bachman. As a former editor of “national several [sic.] science and building design magazines” (a) do You agree that the Connecticut Siting Council does not have jurisdiction over the “thermal loop” and (b) provide

documentation to support Your statement that “[NuPower’s] argument that the fuel cell emissions will be offset by the thermal loop is no longer viable.”

5. Reference the Connecticut Siting Council’s December 17, 2020 Staff Report in Petition No. 1406 at page 2. Do you possess information that contradicts the following statement of the Siting Council: “The proposed facility is a distributed generation resource, and will contribute to fulfilling the State’s Renewable Portfolio Standard as a low emission Class I renewable energy source.”
6. Reference the Connecticut Siting Council’s December 17, 2020 Staff Report in Petition No. 1406 at page 4. Do You possess information that contradicts the following statement of the Siting Council: “Air emissions produced during the operation of the facility would not trigger any regulatory thresholds.”
7. Reference the Connecticut Siting Council’s December 17, 2020 Staff Report in Petition No. 1406 at page 4. Do You possess information that contradicts the following statements of the Siting Council: “[the] proposed facility would emit 0.42 tons per year of methane (CH₄), <0.2 tons per year of nitrous oxide (N₂O), no sulfur hexafluoride (SF₆), hydrofluorocarbons (HFCs) or perfluorocarbons (PFCs), which are greenhouse gases defined in Regulations of Connecticut State Agencies Section 22a-174-1(49)... and emit negligible amounts of sulfur oxides, volatile organic compounds and particulate matter.”
8. Please provide dates and instances of any explosions or fires associated with or caused by fuel cells manufactured by Doosan Fuel Cell of America.
9. Reference Your April 29, 2021 Letter to the Editor of the CT Post. Provide any document or material upon which You base your claim that NuPower is seeking approval of a “seven-story tower.”
10. Please provide social media posts to include Facebook, Twitter, and Instagram by You concerning the Project as well as emails or other correspondence sent by You to the Board of Directors and/or residents of Seaside Village concerning the Project.

Respectfully submitted,

NuPower Bridgeport FC, LLC



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