

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Petition of Allen Place FC, LLC for a Declaratory Ruling, : Petition No.  
Pursuant to Connecticut General Statutes §§ 4-176 and 16- :  
50k, for the Proposed Construction, Maintenance and :  
Operation of a 250-kilowatt Fuel Cell Combined Heat and :  
Power Generating Facility to be Located at 159 Allen Place, :  
Hartford, Connecticut, and Associated Electrical :  
Interconnection. : December 6, 2022

Petition for Declaratory Ruling of Allen Place FC, LLC

I. Introduction

Pursuant to Sections 4-176(a) and 16-50k(a) of the Connecticut General Statutes ("CGS") and Section 16-50j-38 et seq. of the Regulations of Connecticut State Agencies ("RCSA"), Allen Place FC, LLC ("APFC" or the "Company"), a wholly owned subsidiary of FuelCell Energy, Inc. ("FCE"), hereby petitions the Connecticut Siting Council ("Council") for a declaratory ruling that a Certificate of Environmental Compatibility and Public Need ("Certificate") is not required for the proposed location, construction, operation and maintenance of a 250-kilowatt ("kW") fuel cell combined heat and power generating facility, an electrical interconnection, and associated equipment (collectively, the "Project"). The Project will be located at 159 Allen Place, Hartford, Connecticut ("Property").

As discussed more fully in this petition, the construction, operation and maintenance of the Project satisfies the statutory elements of CGS § 16-50k(a)<sup>1</sup> and will

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<sup>1</sup> CGS Section 16-50k(a) provides, in pertinent part:

"Notwithstanding the provisions of this chapter or title 16a, the council shall, in the exercise of its jurisdictions over the siting of generating facilities, approve by declaratory ruling . . . (B) the construction or location of any of any fuel cell, unless the council finds a substantial adverse environmental effect, or of any customer-side distributed resources project or facility or grid-side distributed resources project or facility with a

not have a substantial adverse environmental effect. Accordingly, this petition for a Declaratory Ruling (“Petition”) should be approved by the Council.

## II. Background

### A. Petitioner

APFC is a wholly-owned special purpose subsidiary of FCE created for the financing and development of the Project. Over the past 53 years FCE, together with its subsidiaries, has designed, manufactured, sold, installed, operated, and serviced fuel cells across the world, thereby, becoming a global leader in the delivery of clean, efficient and affordable fuel cell solutions. FCE is a Delaware corporation headquartered in Danbury and has manufacturing plants in Torrington, Connecticut and Taufkirchen, Germany. FCE’s global fleet of SureSource power plants spans three continents and is leading the industry with millions of megawatts of ultra-clean power produced.

FCE utilizes state-of-the-art fuel cells that provide environmentally responsible solutions for various applications such as utility-scale and on-site power generation, carbon capture, local hydrogen production for both transportation and industry, and long duration energy storage. The fuel cell systems are catered to meet the needs of customers across several industries including educational institutions. (e.g., Trinity College, Central Connecticut State University, the University of Bridgeport, San Francisco

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capacity of not more than sixty-five megawatts, as long as: (i) Such project meets air and water quality standards of the Department of Energy and Environmental Protection, (ii) the council does not find a substantial adverse environmental effect...”.

State University, etc.), hospitals (such as Hartford Hospital and UC Irvine Medical Center), municipalities, and a variety of industrial and commercial enterprises (e.g., Pepperidge Farm Bakery and Pfizer).

All correspondence and/or communications regarding this Petition should be addressed to:

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## B. Project

On April 30, 2021, The Connecticut Light and Power Company dba Eversource Energy ("Eversource") and The United Illuminating Company, issued a joint Year 10 Request for Proposals ("RFP") for the purchase of renewable energy credits ("REC") produced by eligible Class I renewable energy generation projects that have low or zero emissions," pursuant to CGS §§ 16-244r and 16-244s ("LREC/ZREC Program"). APFC submitted a bid in response to the RFP for a 250 kW customer-side fuel cell combined heat and power generating facility to be constructed at the Property, within Eversource's

service territory (“Project”). APFC was selected as a winning bidder and entered into a long-term contract with Eversource (“LREC/ZREC Agreement”), whereby APFC will design, install, own and operate one of FCE’s SureSource Solid Oxide Fuel Cell (“SOFC”) systems nominally rated at 250 kW and Eversource will purchase the RECs produced by the SOFC system.

In 2022, APFC entered into a long-term power purchase agreement (“PPA”) with The Trustees of Trinity College, Inc., a Connecticut non-profit educational institution (“Trinity College” or the “College”) with a campus located at 300 Summit Street, Hartford, Connecticut for the sale of all of the energy and thermal output produced by the Project. Thus, in accordance with the terms of the LREC/ZREC Agreement and the PPA, Eversource will purchase the RECs and Trinity College will purchase all the energy and thermal output generated by the Project. FCE will be responsible for the construction and long-term service of the Project under a contract with APFC for the duration of the PPA, which is fifteen years, excluding any agreed upon extensions.

The estimated cost of the project is \$9.2 million.

### III. Description of the Project

#### A. Overview

##### 1. Site

The Project will occupy an area of approximately 1000 square feet of space within Trinity College (“Project Site” or the “Site”). See Exhibit A for a preliminary Site map of the Project. The Site is specifically located at the North Campus of Trinity College, in the grassy area between one of the College’s parking lots at Allen Place and Eversource’s

Allen Place Substation lineup. See Figures 1 and 2. The existing topography ranges from approximately 140 feet to 150 feet above mean sea level. See Exhibit E1.

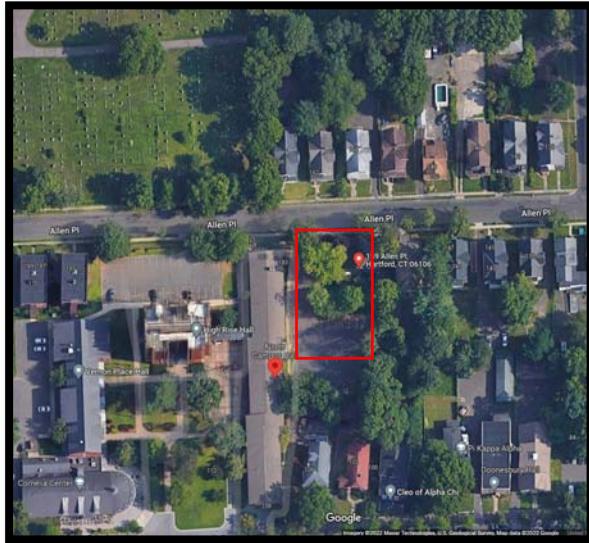


Figure 1: Aerial view of the Site

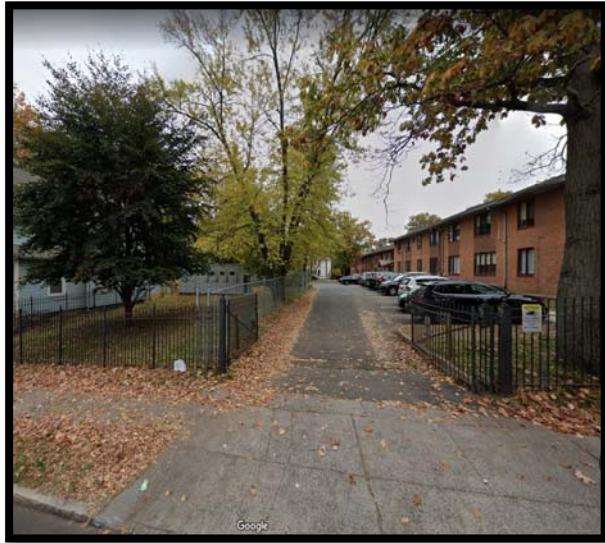


Figure 2: Site view from Allen Place

The Site is located in a multi-use mix district with a campus overlay district within the City of Hartford. The Site is predominantly surrounded by college and residential buildings and a cemetery on the far north. The properties adjacent to the Site are zoned as open space, multi-use mix and neighborhood mix. In addition, the Allen Place neighborhood is located in a federal Opportunity Zone. For this reason, the proposed Project is the type of energy project that is incentivized by state and federal programs.

## 2. Project Specifications

The Project will consist of one natural gas-fired SureSource 250 SOFC power plant (the “SureSource 250”) that will be configured to operate as a Combined Heat and Power unit. The SureSource 250 unit will cogenerate a nominal 250 kW of Connecticut Class I renewable energy for use at the College. See the Equipment Specification Sheet attached hereto as Exhibit B. The Project will deliver hot water to the boiler room of the

North Campus Hall building of the College and electricity to the North Campus electrical loop. APFC will deliver thermal energy to a point just inside the North Campus Hall boiler room, specifically to a flat flange to allow for interconnection to the College's thermal system. All the electricity generated by the proposed fuel cell unit will be supplied to the College, as set forth in the PPA, and all RECs will be sold to Eversource in accordance with the LREC/ZREC Agreement.

The SureSource 250 is comprised of a SOFC skid and a heat recovery unit ("HRU"). The SOFC skid is divided into three major subsystems: the mechanical balance of plant ("MBOP"), the electric balance of plant ("EPOB") and the SOFC module. The MBOP supplies fresh air, cleans and heats fuel, and includes the power plant control system. The SOFC module performs the electrochemical conversion of the continuous fuel supply into DC electric power. And the EPOB converts the fuel cell DC power into utility grade AC power. The HRU will likely be placed on top of the SOFC skid. In an alternative configuration that is also being considered, the SureSource 250 will be externally equipped with a HRU and sound damper system.

The SOFC skid will occupy a footprint of approximately 36 feet by 10 feet and will have door panels on all sides. These door panels will be equipped with locks to restrict access to the fuel cell system to authorized personnel only. The fuel cell system will be installed on a concrete foundation approximately six (6) inches above finished grade. All the utility connections, including the electrical interconnection, will be trenched below the grade. The vertical exhaust stack of the SureSource 250 unit, the highest feature of the fuel cell system, will be approximately fourteen (14) feet above the top of the concrete pad, assuming the HRU is installed on top of the SOFC skid.

The Project will be interconnected for backup power to Eversource's Allen Place Substation. FCE intends to file an Interconnection Application on December 16, 2022. The fuel cell facility will use natural gas and will require approximately 96 gallons of water on start-up. Water will only be needed upon start-up, once operational, the fuel cell facility will not consume water. For this reason, there will not be any water discharges from the facility under normal operating conditions. APFC will connect the fuel cell facility to the College's existing water line located approximately 50 feet from the Site. The water and natural gas utility outlets are located outside of North Campus Hall. A service connection to the existing natural gas line will be constructed underground to supply the fuel cell facility with the required natural gas. The natural gas interconnection will extend across the parking lot, approximately 50 feet to a gas main.

#### B. Project Benefits

As a Class I renewable energy facility, the Project will contribute to Connecticut's renewable energy portfolio standards and will advance the state's renewable energy goals by providing constant and reliable generation of electricity. The Project will be used to satisfy a portion of the electrical and thermal needs of the College. For this reason, the electric load that Trinity College will need to obtain from the electric grid will be reduced, including the summertime peak demand; thereby, reducing the load on overloaded electric transmission lines. Additionally, this Project will result in monetary savings to the College in their annual utility costs - electricity and thermal energy. Lastly, the SureSource 250 will deliver clean on-site generation and decrease the College's dependency on the grid, which is particularly important during grid outages.

### C. Municipal Input

Representatives of FCE have met with officials from the City of Hartford, including Mayor Luke Bronin, to discuss the Project. To this date, the City of Hartford has not expressed any concerns regarding the Project, and it is generally supportive of the Project. Additionally, it should be noted that FCE has previously developed, installed, and operated three separate fuel cell systems in the City of Hartford, one of which was at Trinity College. All of these projects were approved by the Council. See Petition No. 1458 (Homestead Avenue) (Approved, December 20, 2021); Petition No. 1317 (Trinity College) (Approved, September 15, 2017); and Petition No. 1067 (Hartford Hospital) (Approved, July 25, 2013).

### D. Public Notice

The Company has provided notice of this Petition via certificate of mailing to all persons and appropriate municipal officials and governmental agencies to whom notice is required to be given pursuant to RCSA § 16-50j-40(a).<sup>2</sup> Sample copies of the notice letters and service lists are attached. See Exhibit C.

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<sup>2</sup> RCSA § 16-50j-40(a) in part provides:

"Prior to submitting a petition for a declaratory ruling to the Council, the petitioner shall, where applicable, provide notice to each person other than the petitioner appearing of record as an owner of property which abuts the proposed primary or alternative sites of the proposed facility, each person appearing of record as an owner of the property or properties on which the primary or alternative proposed facility is to be located, and the appropriate municipal officials and government agencies...The term "appropriate municipal officials and government agencies" means, in the case of a facility required to be approved by declaratory ruling, the same officials and agencies to be noticed in the application for a certificate under Section 16-50l of the Connecticut General Statutes....".

#### IV. No Substantial Adverse Environmental Effect

As discussed more fully below, the Project will have no substantial adverse environmental effect.

##### A. Environmental Effects

###### 1. Air Quality Impact

The Project will meet all applicable state and federal air quality standards. The total potential emissions for the fuel cell facility, assuming continuous year-round full power operation, are calculated to be:

<b>Criteria Pollutant/ Greenhouse Gas</b>	<b>Total Potential Emissions (lb/MWh)</b>
Nitrogen Oxides (NO <sub>x</sub> )	0.01
Sulfur Oxides (SO <sub>x</sub> )	<0.0001
Particulate Matter (PM <sub>10</sub> )	Negligible
Carbon Monoxide (CO)	Negligible
Volatile Organic Compounds (VOC)	Negligible
Carbon Dioxide (CO <sub>2</sub> )	750

Table 1: Total Potential Emissions for the SureSource 250

The fuel cell facility will also house a 1.5 MMBtu/hr natural gas-fired burner that will be used upon start-up to heat up the fuel cell unit to its required operating temperature. The burner, in conjunction with the fuel cell unit, will have combined total potential emissions less than fifteen (15) tons per year ("tpy"). Consequently, a New Source Review permit will not be required for the construction and operation of the fuel cell facility. Further, the total emissions associated with the construction and operation of the Project will be below levels that will render the Project a "major stationary source" as defined in RCSA § 22a-174-1(65) or a major source of hazardous air pollutants. Thus, the Project will be considered a minor stationary source and will not be subject to Non-Attainment

New Source Review or require emission offsets for its construction. Lastly, the potential greenhouse gas emissions from the Project will be well below the 75,000 tpy threshold established by the US Environmental Protection Agency (“EPA”) Tailoring Rule, and thus, the emissions will not trigger a requirement for an air permit.

The Project will ultimately displace less efficient fossil fueled marginal generation on the ISO New England system. Based upon the most recent EPA “eGrid” data (EPA EGRID 2020 (January 2022) US, non-baseload), the Project is expected to generate 190 lb/MWh less carbon dioxide emissions than utility grid power,<sup>3</sup> while emitting virtually no criteria air pollutants.

## 2. Water Quality Impacts

The Project will comply with the applicable water quality standards. As previously discussed, the SureSource 250 will require approximately 96 gallons of water upon startup. The proposed fuel cell facility will have a water connection to Trinity College’s water system. Once operational, the unit will neither consume potable water nor discharge wastewater under normal operating conditions. For this reason, the Project will not require a wastewater discharge permit. Additionally, because the Site is less than one acre, the Project will not require a Connecticut Department of Energy and Environmental Protection (“DEEP”) General Permit for Discharge of Stormwater and Dewatering Wastewaters for Construction Activities either.

A review of DEEP’s Water Quality Classification Maps indicated that there are no surface water bodies located at or near the Site, and the Site’s ground water is classified as “GB” which designated uses include industrial process water and cooling waters. See

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<sup>3</sup> To produce 250 kW of electricity.

Exhibit E2. APFC anticipates that construction of the proposed fuel cell facility will require limited excavation of soils and that any groundwater in the vicinity to the Site will not be impacted by the installation and operation of the Project. Consequently, there will be an adequate water supply and infrastructure to supply the Project (for the initial water-injection), and no substantial adverse environmental effects will occur from the Project's construction and water use.

3. Hazardous Materials (Natural Gas Desulfurization Process and Materials Storage)

Liquid nitrogen will be stored on the Site to protect the fuel cell from damage from air and humidity ingress when the fuel cell is switched off-line and not in operation. Nitrogen is not used as part of normal fuel cell operation and it is considered a non-toxic, nonflammable gas hazardous material. The Company will comply with the applicable EPA reporting requirements for nitrogen. Approximately 8500 liters of liquid nitrogen will be stored on-site.

The operation of the fuel cell facility will also result in the production of some hazardous materials. The SureSource 250 incorporates a desulfurization process to remove the sulfur odorant compounds that are generally present in the natural gas. The desulfurization process consists of two flow-through vessels configured in series filled with a specialized, proprietary desulfurization adsorption media. When the adsorption media reaches capacity - it is unable remove any more sulfur and thereby becomes "spent" - it needs to be replaced. At that point, the fuel gas process flow is switched to the lag vessel only so that the spent media can then be removed from the off-line vessel and replaced with fresh media. Prior to accessing the spent media, the vessel is inerted

with nitrogen to allow safe access into the vessel. During this inertion process, a small volume of natural gas is vented to the atmosphere. After media replacement and once the vessel containing the fresh media has been inerted and purged into service, this vessel then serves as the second (polishing) desulfurizer vessel in the process flow service. The total waste generation quantity (media plus adsorbed sulfur compounds) during any single desulfurizer media replacement event is less than 320 pounds and the waste is generally characterized as Resource Conservation and Recovery Act hazardous material. Desulfurized media replacement events are expected to occur approximately every two years, but it might vary depending on the actual sulfur concentration in the natural gas locally. The Company will comply with all rules for hazardous waste generators in RCSA § 22a-449(c)-1 through 22a-449(c)-119, as applicable.

#### 4. Wildlife and Aquifer Protection Areas

The Site is not located within a DEEP Natural Diversity Data Base (“NDDB”) polygon area. A map representing the NDDB areas in the City of Hartford, attached hereto as Exhibit E3, shows that the Project Site is not located within an identified location of endangered, threatened and special concern species and no significant natural communities exist within or proximate to the Project Site. Given that the Project is not expected to impact any state-listed species, consultation with CT DEEP’s NDDB relating to construction of the Project is not required. Lastly, the Site is not located within or in close proximity to a mapped (preliminary or final) DEEP Aquifer Protection Area. See Exhibit E3.

## 5. Wetlands and Watercourses

There are no watercourses, wetland features or hydric soils at or near the Site. As illustrated in the U.S. Fish & Wildlife Service's National Wetlands Inventory, the nearest wetland to the Project Site is approximately 0.5 miles to the northwest. See Exhibit E4. The wetland is a pond located inside Pope Park, past Zion Hill Cemetery and a few streets over from Allen Place. As such, the Project Site will be sufficiently set back from wetland resources and no direct impacts are expected to occur. Nonetheless, APFC will implement sedimentation and erosion controls in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control. Additionally, the Project will be designed such that any stormwater generated by the proposed development will be properly handled and treated in accordance with the 2004 Connecticut Stormwater Quality Manual. Based on the foregoing, APFC does expect the Project to negatively impact any wetlands or watercourses.

## 6. Flood Zones

A review of the Federal Emergency Management Agency's ("FEMA") National Flood Insurance Program ("NFIP") flood mapping data for the City of Hartford indicated that the Site is designated as Zone X, an area of minimal flooding, generally above the 500-year flood level and protected by levee from 100-year flood. See Exhibit E5. For this reason, the Project will not be located within a 100-year or 500-year flood zone, and thus, no design considerations or precautions relative to flooding will be required for construction of the fuel cell facility. Lastly, the Project is not expected to impact floodplain or downstream areas.

## 7. Prime Farmland and Core Forest Resources

The Site is not located on Prime Farmland, including statewide and locally important farmland soils, or Core Forest. As illustrated in the Connecticut Environmental Conditions Online (“CT ECO”) Maps, specifically the Forestland Habitat Impact map and the Farmland Soils map, the Site is no located on Core Forest or Prime Farmland. See Exhibit E6. Consequently, construction of the Project will not impact Prime Farmland or Core Forest resources.

## 8. Noise Analysis

The Project has been designed with significant attention to protecting the community sound environment. The SureSource 250 and ancillary equipment, including small transformers, electrical buses and inverters, as well as fans providing ventilation to some of the equipment, will produce no significant sound. In accordance with the terms of an amendment to the PPA, FCE agreed to install soundproofing equipment and/or utilize materials that will ensure the fuel cell facility’s sound level does not exceed 65 dBA at ten (10) feet in any direction from the outermost point of the physical fuel cell unit during standard operation of the SureSource 250.

## 9. Visual Impact

The Project will not create a substantial change in the visual and aesthetic characteristics of the Project area. The height of the proposed fuel cell facility will not be taller than nearby buildings. Further, the Project will occupy an area of approximately 1000 square feet of space, and it will be surrounded by vegetation on all sides, except the west side, where Trinity College’s North Campus Hall is located. See Figure 3. For

this reason, any views of the Project Site will be obstructed by nearby man-made and natural structures. Lastly, no state or local designated scenic roads or scenic areas are located near the Site. Consequently, no scenic and recreational areas will be physically or visually impacted by construction of the Project.

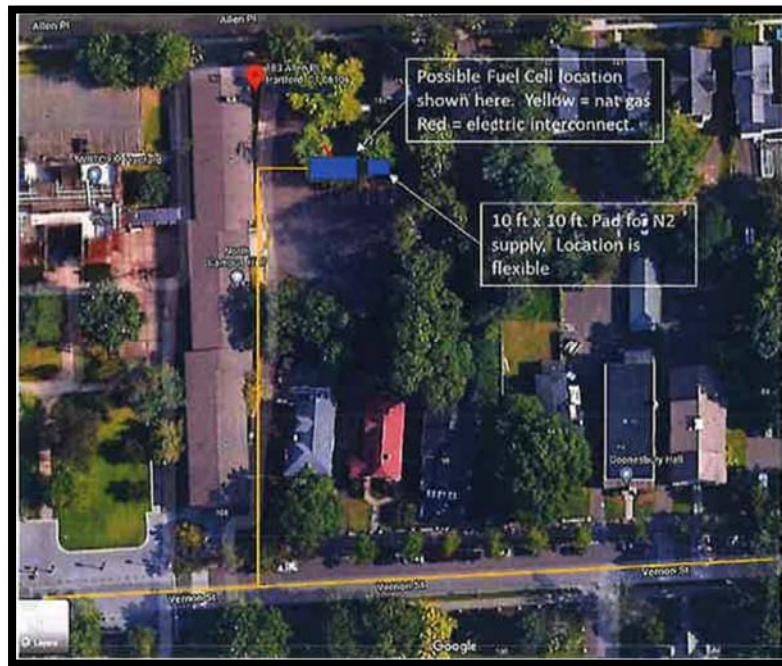


Figure 3: Aerial view of the proposed fuel cell facility

## 10. Public Health and Safety

The Project will be constructed and operated in compliance with all applicable local, state, national and industry health and safety standards and requirements related to electric power generation, including the National Fire Protection Association 853 standards. Further, the SureSource 250 fuel cell power plant is certified to the ANSI/CSA FC 1-2014 standard, which incorporates dozens of normative references to other codes and standards including NEMA, ASME, ASTM, NFPA and UL. The SureSource 250 fuel cell power plant also complies with the applicable provisions of mechanical, piping, fire protection, safety and electric codes.

For the most part, the fuel cell facility will be remotely operated and monitored, but technicians will periodically visit the Site to oversee operations and perform the required maintenance. The SureSource 250 is equipped with sensors that will alert the Company of any malfunction and the appropriate shut-down procedures will be initiated.

The Company will adhere to the maintenance and fuel pipe cleaning procedures established in accordance with Public Act 11-101 and the Council's Docket NT-2010. As such, a clean rag will be drawn through the pipe multiple times to ensure there is no construction debris or foreign matter remaining in the pipe. Any remaining dust will then be blown out with compressed air. No gas blows of any flammable gas will be used for pipe cleaning.

In accordance with the Council's decision in Docket NT-2010, the Project will also have a customized Emergency Response Plan ("ERP"). See Exhibit F. The ERP includes the following information:

1. A description of any simulated emergency response activities with any state and/or local emergency response officials;
2. Details of the Site access system; and
3. Establishment of an emergency responder/local community notification system for on-site emergencies and planned construction-related activities that could cause community alarm.

Before commercial operation, the Company will discuss the Project with the City of Hartford's Fire Department and the Trinity College's campus safety department, and offer to provide on-site training on emergency procedures, if requested. In addition, copies of the ERP will be provided to the City of Hartford's Fire Department personnel and local emergency responders, as well as the College's campus safety department.

As previously discussed, public access to the fuel cell equipment will be restricted by a door panel enclosure around the SOFC skid. The enclosure will be equipped with locks for necessary access. All door panels will be kept locked when operating personnel are not present. In the event of an emergency, if the door panels are locked, the Emergency Fire Department will be able to access the Site by cutting the locks with a bolt cutter. The appropriate signs will be placed at the Site to deter trespassers. Additionally, the Site will be adequately illuminated by a light post that is located on the adjacent parking lot. Lastly, the fuel cell facility will be located within property of the College that is monitored by campus security personnel including by means of video surveillance.

The construction of the Project will not cause any significant disturbances to traffic conditions and/or local roads. APFC anticipates that the heavy equipment will be delivered to the Site over a 60-day period, which will be scheduled to coincide with the college summer break - May through July 2023. The City of Hartford police department and Trinity College campus safety personnel will be notified prior to delivery of the equipment to coordinate such delivery(ies). On-site traffic controls will also be utilized to minimize any impact to typical traffic patterns and staging of all equipment will occur on-site. Lastly, because the fuel cell facility will be remotely operated, minimal personnel trips to the Site will be occurring during the operating life of the fuel cell facility.

## 11. Historical Values

The Project is not expected to have any adverse effects on the state's historic or archaeological resources. A search in the National Register of Historic Places map revealed that there are three (3) National Register of Historic Places ("NHRP") listed property within a half mile of the Site: the Frog Hollow Historic District, the Allen Place-

Lincoln Street Historic District and Saint Anthony Hall. See Exhibit D. The NRHP properties will not be directly impacted by the Project due to intervening structures and/or vegetation, as well as their distance to the Project Site. Additionally, the height of the fuel cell facility will not exceed the height of nearby buildings.

A request was made to the Connecticut State Historic Preservation Office (“SHPO”) regarding the Project’s effect on historic, architectural or archaeological resources listed on or eligible for the NRHP. See Exhibit D. As of the date of filing of this Petition, a response from SHPO has not been received.

## 12. FAA Determinations

The nearest airports and/or heliports to the Site are St. Francis Hospital Heliport approximately 1.35 miles northwest, Hartford-Brainard Airport approximately 2.12 miles to the southeast, Delta One Heliport approximately 2.73 miles northeast, Rentschler Heliport approximately 3.37 miles to the east and Hurlbrink Heliport approximately 5.42 miles to the southwest. The Project will have a maximum height of approximately 14 feet above ground level, below the Federal Aviation Administration (“FAA”) notification requirements of 14 Code of Federal Regulations, Part 77.9. For this reason, APFC will not be providing notification to the FAA of the Project.

## V. Project Construction, Maintenance and Decommissioning Plan

Contingent upon obtaining the Council’s approval, the Company expects construction to commence in May 2023, with commercial operation of the fuel cell facility to begin in September 2023. Generally, construction will take place Monday through

Friday from 7:00 a.m. to 5:00 p.m. and on the weekends, only when necessary, and from 9:00 a.m. to 5:00 p.m.

The operational life of the fuel facility is twenty (20) years. FCE will conduct routine maintenance on the fuel cell facility, as stipulated in an agreement between FCE and APFC and consistent with the terms of the PPA. The solid oxide media in the fuel cells must be replaced every five (5) to seven (7) years and other media in the fuel cell must be replaced as follows:

Item	Service Life
Fuel Preparation	
Sulfur Sorbent	6-24 months
Pre-converter Catalyst	60 months
Electrical Balance of Plant	
Chiller Glycol	18 months

Table 2: Media Service Life

Table 2 lists the media service life based on typical site conditions. However, actual service life might vary with site conditions and fuel and air quality.

When the PPA terminates, including any applicable contract extensions, FCE will decommission the fuel cell facility in accordance with the following plan:

1. All utility connections will be cut and capped at the grade level. Specifically, all natural gas piping will be disconnected from the gas utility meter, water connections will be disconnected from Trinity College's water system and the electrical feeders will be disconnected from the fuel cell facility and any ancillary equipment.
2. All fuel cell equipment will be decommissioned, disassembled and removed from the Site.
3. The disassembled equipment will be recycled, reclaimed or transported to a landfill as applicable.

4. To the extent feasible, the Site will be returned to its original condition. Except that equipment pads and retaining walls will remain as-is for future use by Trinity College.

## VI. Conclusion

For the foregoing reasons, APFC respectfully requests that the Council issue a determination, in the form of a declaratory ruling, that the proposed Project as described in this Petition will not have a substantial adverse environmental effect, and therefore, that a Certificate is not required.

Respectfully submitted,

Allen Place FC, LLC



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## **Table of Exhibits**

Exhibit A: Site Plan

Exhibit B: Equipment Specification Sheet

Exhibit C: Public Notice Documentation (Service Lists, Sample Notice Letters, Affidavits and Abutters Map)

Exhibit D: SHPO Application including National Register of Historic Places Map

Exhibit E: Environmental Maps

Exhibit E1: USGS Topographic Map

Exhibit E2: Water Quality Classification Map

Exhibit E3: NDDB Map and Aquifer Protection Maps

Exhibit E4: U.S. Fish & Wildlife Service's National Wetlands Map

Exhibit E5: FEMA Flood Map

Exhibit E6: CT ECO Forestland Habitat Impact Map and Farmland Soils Map

Exhibit F: Emergency Response Plan