



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

January 23, 2023

Bruce L. McDermott, Esq.
Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
bmcdermott@murthalaw.com

RE: **PETITION NO. 1553** - Allen Place FC, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a customer-side 250-kilowatt fuel combined heat and power cell facility and associated equipment near North Campus Hall in the northern portion of the Trinity College campus located at 159 Allen Place, Hartford, Connecticut.

Dear Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than February 14, 2023. Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the February 14, 2023 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman
Executive Director

MB/IN

c: Service List dated December 7, 2022

Petition No. 1553
Allen Place FC, LLC
Trinity College Campus, 159 Allen Place
Hartford, Connecticut
Interrogatories
Set One
January 23, 2023

Notice

1. Referencing page 8 of the Petition, has the City of Hartford and/or any abutters provided comments to Allen Place FC, LLC (APFC) since the Petition filing? If so, please summarize the comments and how these comments were addressed.

Project Development

2. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant?
3. Where is Eversource's Allen Place Substation located?
4. What is the voltage of Eversource's Allen Place Substation? Would the project require any upgrades to the substation? If so, describe the nature of these upgrades.

Proposed Site

5. What is the distance and direction of the nearest off-campus residence from the proposed fuel cell facility?
6. What is the distance and direction of the nearest on-campus building from the proposed fuel cell facility? What is that building used for?
7. What is the distance and direction of Eversource's Allen Place Substation from the proposed fuel cell facility?
8. Referencing page 5 of the Petition, please define a federal Opportunity Zone.

Energy Output

9. What percentage of the college campus's electrical load would the proposed fuel cell facility provide?
10. Could the facility continue operating during a power outage and provide seamless uninterruptable power?

Site Components/ Interconnection

11. Provide a detailed site plan of the facility, including, but not limited to the dimensions and location of the proposed fuel cell and its features, concrete pad, the fence design and bollards (if applicable), utility connections and points of interconnection.
12. Referencing page 7 of the Petition, how would the fuel cell facility be interconnected for backup power to Eversource's Allen Substation?
13. What percentage of the North Campus Hall Building's thermal load would be served by the waste heat from the fuel cell facility?
14. Would outdoor cooling units be required to neutralize any waste heat that is not utilized inside the building? If yes, how many would be required and where would they be located?
15. Referencing page 7 of the Petition, what is the status of the Interconnection Application?

Public Safety

16. Using the inverse square law or other noise analysis method, would operational noise from the fuel cell meet the applicable Department of Energy and Environmental Protection Noise Control Standards at the nearest abutting property line?
17. Referencing page 14 of the Petition, for the amendment to the Power Purchase Agreement, what equipment or materials would be used to ensure the facility's sound level does not exceed 65 dBA at 10 feet in any direction?

Environmental

18. Referencing page 11 of the Petition, where will the liquid Nitrogen be stored on site. Explain how it would be used.
19. Would lighting be used on site? If so, for what purpose and what type would be installed (e.g motion activated, preset timer...)?