

280 Trumbull Street
Hartford, CT 06103-3597
Main (860) 275-8200
Fax (860) 275-8299
jmiranda@rc.com
Direct (860) 275-8227

Also admitted in District of
Columbia and Massachusetts

Via Hand Delivery and Electronic Mail

November 15, 2010

Linda Roberts
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. NT-2010: Reopening of Final Decisions Pursuant to C.G.S. § 4-181(a)(b) for Jurisdictional Natural Gas-Fired Electric Generating Facilities Under C.G.S. § 16-50i(a)(3) and C.G.S. § 16-50k(a) Limited to Council Consideration of Changed Conditions and the Attachment of Conditions to the Certificates and Declaratory Rulings Consistent with the Findings and Recommendations in the Final Report Issued by the Kleen Energy Plant Investigation Review Panel (Nevas Commission) and the Findings and Recommendations in the Executive Report Issued by the Thomas Commission**

Dear Ms. Roberts:



Enclosed are an original and fifteen (15) copies of the Responses of DFC-ERG Milford, LLC to Connecticut Siting Council Pre-Hearing Interrogatories in connection with the above-referenced proceeding.

Please feel free to contact me if you have any questions or require additional information. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Joey Lee Miranda".

Joey Lee Miranda

Enclosures

Copy to: Service List

Law Offices

BOSTON

PROVIDENCE

HARTFORD

NEW LONDON

STAMFORD

WHITE PLAINS

NEW YORK CITY

ALBANY

SARASOTA

www.rc.com

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
REOPENING OF FINAL DECISIONS : DOCKET NO. NT-2010
PURSUANT TO C.G.S. § 4-181a(b) FOR :
JURISDICTIONAL NATURAL GAS-FIRED :
ELECTRIC GENERATING FACILITIES :
UNDER C.G.S. § 16-50i(a)(3) AND C.G.S. § :
16-50k(a) LIMITED TO COUNCIL :
CONSIDERATION OF CHANGED :
CONDITIONS AND THE ATTACHMENT OF :
CONDITIONS TO THE CERTIFICATES AND :
DECLARATORY RULINGS CONSISTENT :
WITH THE FINDINGS AND :
RECOMMENDATIONS IN THE FINAL :
REPORT ISSUED BY THE KLEEN ENERGY :
PLANT INVESTIGATION REVIEW PANEL :
(NEVAS COMMISSION) AND THE :
FINDINGS AND RECOMMENDATIONS IN :
THE EXECUTIVE REPORT ISSUED BY THE :
THOMAS COMMISSION : NOVEMBER 15, 2010

**RESPONSES OF DFC-ERG MILFORD, LLC TO
CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES**

On October 28, 2010, the Connecticut Siting Council (“Council”) issued Pre-Hearing Interrogatories to DFC-ERG Milford, LLC¹ (“DFC-ERG”) in connection with the above-captioned proceeding. Below are DFC-ERG’s responses.

Question No. 1

Is the fuel cell unit stationary or mobile?

Response

The fuel cell units associated with the DFC-ERG project will be stationary.

¹ For additional information regarding the project, see Petition No. 828.

Question No. 2

If the fuel cell unit has already been constructed and installed, what NFPA standards were applied to the construction and installation?

Response

Not applicable.

Question No. 3

If the fuel cell unit has yet to be constructed and installed, what NFPA standards will apply to the construction and installation?

Response

The design, fabrication and installation of the project are governed by numerous standards and codes including the American National Safety Institute/CSA Standards (“ANSI/CSA”) FC-1 (Stationary Fuel Cell Power Requirements), National Fire Protection Association (“NFPA”) 853 (Standard for the Installation of Stationary Fuel Cell Power Systems) and NFPA 54 (National Fuel Gas Code). Prior to operation, DFC-ERG will also discuss the project with the Milford Fire Department and the Local Emergency Planning Committee.

Question No. 4

How would recommendation #6, “Recommendation as to adoption of codes” in the Thomas Commission recommendations affect the facility?

Response

Since recommendation #6 simply calls for the adoption of various standards that DFC-ERG already intended to employ, as appropriate, through the use of good engineering practices, it will not have a significant effect on the design, installation or operation and maintenance of the facility.

Question No. 5

How do the following codes affect construction, installation or modification of the unit:

- a. NFPA 37 (2010 edition);
- b. NFPA 54 (2009 edition);
- c. NFPA 54 Temporary Interim Amendment 09-3 (August 25, 2010);
- d. NFPA 850 (2010 edition);
- e. NFPA 853 (2010 edition);
- f. ASME B31; and
- g. ASME B31.1 Appendices IV and V.

Response

The DFC-ERG project will be designed, constructed, operated and maintained in accordance with all applicable codes and standards, including NFPA 853, NFPA 54 and NFPA 54 Temporary Interim Amendment 09-3, and ASME B31 (specifically, as applicable, ASME B31.1, B31.3 and B31.8). *See also* Response to Question No. 3. Neither NFPA 37 nor NFPA 850 is applicable to fuel cell installations.

Question No. 6

What is the length of the natural gas piping required for installation and operation?

Response

At this time, DFC-ERG anticipates that it will install approximately 200 feet of natural gas piping for the project.

Question No. 7

What is the operating pressure (psig) of the natural gas piping?

Response

The operating pressure of the natural gas piping to be installed by DFC-ERG that will deliver natural gas to the fuel cells will be in the range of 15 to 25 psig and that will deliver

natural gas to the energy recovery generator (ERG) will be less than 1,440 psig at the inlet and less than 199 psig at the outlet.

Question No. 8

What is useful lifespan of the natural gas piping?

Response

The useful lifespan of the natural gas piping to be installed by DFC-ERG is expected to be significantly greater than 30 years.

Question No. 9

Would the natural gas piping/pipeline need to be replaced during the life of the facility?

Response

DFC-ERG does not anticipate that the natural gas piping it will install will need to be replaced during the life of the project.

Question No. 10

Do you foresee any circumstances that would require replacement of a section of natural gas piping?

Response

At this time, DFC-ERG does not anticipate that any circumstances would require it to replace any of the natural gas piping that it will install. However, it is possible that some currently unforeseen circumstance could lead to a major modification of the project (e.g., major upgrade of one or more of the fuel cells) that would require replacement of the natural gas piping being installed by DFC-ERG.

Question No. 11

If so, would a new section of natural gas piping be installed and require cleaning?

Response

In the unlikely event that there is a major modification to the project, a new section of natural gas piping, which would require cleaning, may need to be installed.

Question No. 12

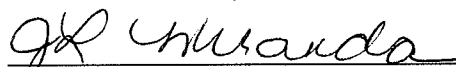
What type of material is the natural gas piping composed of?

Response

DFC-ERG intends to use carbon steel for the natural gas piping that it will install.

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November 2010, a copy of the foregoing was sent via electronic mail or first class mail to all participants of record.



Joey Lee Miranda