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# VIA HAND DELIVERY & ELECTRONIC MAIL

Ms. Linda Roberts
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re Docket No. NT-2010: Reopening of Final Decisions 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

Dear Ms. Roberts:

Enclosed please find an original and fifteen (15) copies of the Consolidated Responses of UTC Power Corporation for Petitions 943, 948, 949, 953 and 961 to the Connecticut Siting Council's October 28, 2010 Pre-Hearing Interrogatories in connection with the above-referenced proceeding.

Please contact me with any questions.

Very truly yours,

Harold M. Blinderman

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HMB/jh Enclosures

cc: Docket NT-2010 Service List

#### STATE OF CONNECTICUT

# **CONNECTICUT SITING COUNCIL**

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 18, 2010

# UTC POWER CORPORATION'S CONSOLIDATED RESPONSES TO THE CONNECTICUT SITING COUNCIL'S NT-2010 PRE-HEARING **INTERROGATORIES: FUEL CELLS**

On October 28, 2010, the Connecticut Siting Council issued Pre-Hearing Interrogatories to UTC Power Corporation ("UTC Power") in connection with the abovecaptioned proceeding. A consolidated response is provided for UTC Power Petitions 943 (931 Torringford Street, Torrington), 948 (360 State Street, New Haven), 949 (835 Washington Street, Middletown), 953 (1 Aircraft Road, Middletown) and 961 (170 Dewitt Street, New Haven) (collectively the "Petitions"). For additional information regarding each respective project, please refer to each individual Petition. UTC Power's consolidated responses are as follows:

## 1. Is the fuel cell unit stationary or mobile?

### Response:

Each of the UTC Power Corporation's ("UTC Power") fuel cell installations described in the Petitions are stationary, distributed generation appliances with electrical supply of less than 600V and less than 10MW.

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

#### Response:

Each of the UTC Power fuel cell installations described in the Petitions have been constructed and installed. Each meets NFPA 853 (Standard for the Installation of Stationary Fuel Cell Power Systems) and, by reference, ANSI/CSA FC1-2004 (American National Standard for Fuel Cell Power Systems). The natural gas piping from the meter to the fuel cell complies with NFPA 54 (National Fuel Gas Code).

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

# Response:

Not applicable. Each of the UTC Power fuel cell installations described in the Petitions have been constructed and installed. See Response to Question 2.

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

#### Response:

Thomas Commission recommendation #6 recommends the adoption of certain codes and standards. To the extent these codes and standards apply to distributed generator appliances, adoption would not significantly affect the fuel cell installations described in the Petition.

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

# a) NFPA 37 (2010 edition);

# Response:

Not applicable. NFPA 37 (2010 edition) does not apply to fuel cell distributed generator appliances.

# b) NFPA 54 (2009 edition);

#### Response:

Each UTC Power fuel cell installation described in the Petitions meets the requirements of NFPA 54 (2009 edition).

# c) NFPA 54 Temporary Interim Amendment 09-3 (August 25, 2010);

# Response:

UTC Power complies with the Temporary Interim Amendment 09-3 to NFPA 54 as operating pressures of natural gas are less than that of the street distribution pressure and pipe diameters are between 2 and 6 inches.

# d) NFPA 850 (2010 edition);

#### Response:

Not applicable. NFPA 850 (2010 edition) does not apply to fuel cell distributed generator appliances.

## e) NFPA 853 (2010 edition);

#### Response:

Each of the UTC Power fuel cell installations described in the Petitions comply with NFPA 853 (2010 editions).

#### f) ASME B31; and

#### Response:

Each of the UTC Power fuel cell installations described in the Petitions comply with the requirements of ASME B 31, section III (B31.3).

## g) ASME B31.1 Appendices IV and V.

## Response:

Not applicable. These appendices do not apply to UTC Power fuel cell installations.

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

#### Response:

The length of piping installed from the natural gas meter to the fuel cell is approximately 122 feet for the fuel cell installation described in Petition 943, 300 feet for the fuel cell installation described in Petition 948, 100 feet for the fuel cell installation described in Petition 949, 260 feet for the fuel cell installation described in Petition 953 and 76 feet for the fuel cell installation described in Petition 961.

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

# Response:

Each of the UTC Power fuel cell installations described in the Petitions operate on standard natural gas appliance pressure of less than ½ psig from the natural gas meter to the fuel cell.

# 8. What is useful lifespan of the natural gas piping?

#### Response:

For each of the fuel cell installations described in the Petitions, the useful lifespan of the natural gas pipeline installed by UTC Power is expected to exceed 30 years.

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

#### Response:

No, not in the normal course of operation.

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

#### Response:

No, not in the normal course of operation.

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

#### Response:

To the extent unforeseen circumstances require installation of a new section of piping, such new piping would require cleaning prior to installation and no additional cleaning is necessary as the installation includes a sediment trap.

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

#### Response:

All natural gas piping used by UTC Power in the installation of the fuel cells described in the Petitions is composed of Schedule 40 carbon steel pipe.

# **CERTIFICATION**

I hereby certify that on this 18<sup>th</sup> day of November 2010, a copy of the foregoing was sent via first class mail, postage pre-paid, or electronic mail to all parties and intervenors of record.

Harold M. Blinderman