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October 8, 2024

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

Re: Petition No. 923 - Fuel Cell Energy, Inc. Petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is Required for the Installation and Operation of a Fuel Cell Test Facility Located at 539 Technology Park Drive, Torrington, Connecticut

Dear Ms. Bachman:

FuelCell Energy, Inc. ("FCE" or the "Company") hereby submits this letter to the Connecticut Siting Council ("Council") to notify the Council about recent changes that FCE has undertaken to its fuel cell testing facility at the Company's Torrington Site. These changes are consistent with the Council's decision approving the construction and operation of the testing facility and will not preclude the Company from continuing to comply with the applicable environmental standards.

On December 9, 2009, the Council issued a decision ("Decision") approving the ongoing installation and operation of a fuel cell testing facility at FCE's Torrington, Connecticut site. In connection with the Company's product development process, FCE utilizes the site's fuel cell testing facility to test newly manufactured fuel cells for design and documentation validation. At the time of obtaining approval to construct the facility, the Company manufactured Direct FuelCell ("DFC") fuel cells that were designed in three different sizes - 300 kW (DFC300), 1.4 MW (DFC1500) and 2.8 MW (DFC3000) at its Torrington Site. Installations associated with the fuel cell testing facility generally include fuel cell modules, electrical balance of plant, main process skid, desulfurization skid and water treatment skid.

The operation of the testing facility does not create any adverse environmental effects. Further, as documented in the Council's December 3, 2009 Staff Report, the visual and noise impacts associated with the operation of the testing facility are minimal and the Company complies with all applicable noise standards. Lastly, as set forth in the Decision, testing is limited to one fuel cell system at a time and the tested system's output must not exceed 5 MW.

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The testing facility's infrastructure has been expanded to accommodate FCE's testing plans for the Company's new products – FCE's SureSource fuel cells. See Attachment 1 for an updated Site Infrastructure Location Plan. The Company has installed its newest 1.4 MW SureSource fuel cell¹ along with several inverter solutions for testing new features and/or components of these products. Additionally, a Carbon Separation Plant or "CO₂ Recovery" was integrated into the 1.4 MW SureSource fuel cell testing facility to test the units' carbon capture and sequestration capabilities. Optimum operation and/or efficacy of the carbon separation features will ensure that the fuel cell units reduce carbon dioxide emissions associated with the operation of the units. The installation and operation of the modified testing facility is consistent with the terms of the Decision and will not result in any adverse environmental effects.

The Company also wishes to notify the Council about the installation and operation of a Nitrogen Generation Plant at its Torrington Site. The Nitrogen Generation Plant (also referred to as the "Cryogenic N₂ Separation and Storage Facility") is not a component of the Company's SureSource fuel cells but the plant was installed as part of FCE's initiative to expand its manufacturing capabilities of its fuel cell modules. Nitrogen gas is used in both the manufacturing and operating processes for the Company's fuel cells. In addition, and as further documented in the attached Environmental Sound Assessment (see Attachment 2), the operation of the Cryogenic N₂ Separation and Storage Facility in combination with the updated testing facility will not generate noise above the Connecticut Department of Energy and Environmental Protection regulatory limits. Consequently, the infrastructure changes to the Torrington Site discussed in this letter will not preclude the Company from continuing to comply with the applicable environmental standards.

An original and fifteen (15) copies of this filing will be hand-delivered to the Council today.

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

Very truly yours,



Bruce L. McDermott

Enclosures

¹ The 1.4 MW SureSource fuel cell was installed to replace the DFC3000BL3 unit and added bolt-on equipment (the DFC-3000 Power Plant) that has been removed from the Torrington Site.