

## Interrogatory CSC 1

FuelCell Energy, Inc.  
Petition No. 923A

Witness: Alexandra Isaac  
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Q-CSC 1: Has Fuel Cell Energy, LLC (FCE) received any comments since the Amended Petition was submitted to the Council? If so, summarize the comments and state how these comments were addressed.

A-CSC 1: FCE has not received any comments on the Amended Petition.

Interrogatory CSC 2

FuelCell Energy, Inc.  
Petition No. 923A

Witness: Joseph Ulevicus  
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Q-CSC 2: What is the acreage of the host parcel?

A-CSC 2: 31 acres.

### Interrogatory CSC 3

FuelCell Energy, Inc.  
Petition No. 923A

Witness: Joseph Ulevicus  
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Q-CSC 3: Would any modifications to the existing fencing around the fuel cell testing facility be required? Does the existing fence comply with current National Electrical Code requirements?

A-CSC 3: Modifications to the existing fencing were required and the fencing complies with National Electrical Code requirements.

## Interrogatory CSC 4

FuelCell Energy, Inc.

Witnesses: Omar Morales  
Joseph Ulevicus

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- Q-CSC 4: Referencing Amended Petition, Facility Sound Assessment, Figure 1, is the fuel cell facility testing site generally limited to the rectangular SS1500 location? What is the approximate area of the fuel cell facility testing site in square feet? Would this area need to be expanded? If yes, by how much, in square feet? Would any trees need to be removed?
- A-CSC 4: Yes, the site is limited to the rectangular location. The site is approximately 2,800 sq ft. No expansion will be needed. No trees will need to be removed.

## Interrogatory CSC 5

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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Q-CSC 5: Referencing Amended Petition p. 1, would FCE continue to only test one fuel cell system at a time and not exceed 5 MW of output? Explain.

A-CSC 5: FCE will continue to test one fuel cell system at a time that will not exceed 5 MW of output.

Interrogatory CSC 6

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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- Q-CSC 6: Referencing Amended Petition p. 2, is the 1.4 MW SureSource the only fuel cell model/size that would be tested at this time? If no, which other fuel cell models/sizes would be tested? Provide a copy of the 1.4 MW SureSource specifications sheet and any other FCE fuel cell specification sheets that are applicable to fuel cell testing at this site.
- A-CSC 6: Yes, only the 1.4 MW carbonate fuel cell would be tested at this time. See Exhibit CSC-6-1.

## Interrogatory CSC 7

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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Q-CSC 7: Approximately how long is the testing period for a new fuel cell facility?

A-CSC 7: There is a planned testing period for the existing 1.4 MW carbonate fuel cell and paired carbon dioxide separation and purification equipment through the end of 2025. The test facility would remain available for other testing after that time and has a useful life of 20 years.

## Interrogatory CSC 8

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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Q-CSC 8: Is the fuel cell waste heat utilized during testing?

A-CSC 8: Waste heat is not currently being used at the facility.



## Interrogatory CSC 9

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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Q-CSC 9: Referencing Amended Petition p. 2, is the SureSource 1.4 MW fuel cell unit comparable in maximum height to the former DFC3000BL3 unit? Explain.

A-CSC 9: The maximum design height of the SureSource 1.4 MW fuel cell unit is less than the former DFC3000BL3 unit.

Interrogatory CSC 10

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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Q-CSC 10: Would the fuel cell facility testing site utilize existing water and natural gas connections, or would such connections need to be modified? Explain.

A-CSC 10: The existing water supply and natural gas supply connections are sufficient for the facility and are not being modified. The sewer discharge has been modified in coordination with the local authorities.

Interrogatory CSC 11

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Kerlyn Pena

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Q-CSC 11: Would the fuel cell operations during testing result in any renewable energy certificates (RECs)? If yes, would FCE sell the RECs to Eversource? Would electrical energy (MWh) from the fuel cell operations during testing also be sold to Eversource?

A-CSC 11: Fuel cell operations during testing will produce renewable energy and renewable energy certificates. Presently, FCE has not entered into any contractual arrangements with Eversource for the sale of electricity and/or RECs associated with the testing facility. The Company is still evaluating its options.

Interrogatory CSC 12

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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Q-CSC 12: Would the fuel cell facility testing site utilize an existing electrical interconnection, require a modified electrical interconnection or would a fuel cell not be grid-connected during testing? Explain.

A-CSC 12: The fuel cell facility testing site is currently operating under the existing electrical interconnection agreement. No changes to that agreement are required to continue testing at this time.

Interrogatory CSC 13

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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Q-CSC 13: Would the fuel cell facility testing site comply with the current National Electrical Code, National Electrical Safety Code, Connecticut State Building Code, Connecticut State Fire Prevention Code, National Fire Protection Association, and American National Standards Institute codes and standards, as applicable?

A-CSC 13: Yes, the fuel cell and associated equipment all comply with the ANSI standards for stationary fuel cell power plants. The modifications required to operate in carbon recovery mode are being inspected and certified to these standards by CSA. The additional equipment has been produced to the appropriate standards and FCE's suppliers are having the equipment certified by Intertek.

Interrogatory CSC 14

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Omar Morales

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Q-CSC 14: Does the existing fuel cell facility testing site have lighting or would additional lighting be required? Explain.

A-CSC 14: Yes, lighting was added to the fuel cell facility testing site including the SureSource 1500 and CO2 Recovery equipment.

Interrogatory CSC 15

FuelCell Energy, Inc.  
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Witness: Joseph Ulevicus  
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Q-CSC 15: Identify the nearest airport to the fuel cell facility testing site and include distance and direction.

A-CSC 15: Green Acres Private Airport; 17 miles southeast;  
Bradley International Airport; 29 miles northeast.

Interrogatory CSC 16

FuelCell Energy, Inc.  
Petition No. 923A

Witness: Joseph Ulevicus  
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- Q-CSC 16: Is notice to the Federal Aviation Administration (FAA) required for the temporarily installed fuel cells at the testing site? Is a crane required to setup and remove fuel cells that would necessitate FAA notice? Explain.
- A-CSC 16: The facility does not exceed the FAA criteria notice. A crane will be used to install and remove fuel cells; however, the gantry crane currently on-site does not exceed the FAA criteria notice.



Interrogatory CSC 17

FuelCell Energy, Inc.  
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Witness: Joseph Ulevicus  
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Q-CSC 17: Where is the nearest fire department located? How would water be supplied to the site in case of fire?

A-CSC 17: The nearest fire department is the Torrington Volunteer Fire Department that is located at 1738 E. Main Street, 2.8 miles from site. In the case of fire, water would be supplied via truck and a fire hydrant located on the property.

Interrogatory CSC 18

FuelCell Energy, Inc.  
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Witness: Joseph Ulevicus  
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Q-CSC 18: Please provide an Emergency Response Plan for the fuel cell operation during testing in accordance with Public Act 11-101, An Act Adopting Certain Safety Recommendations of the Thomas Commission.

A-CSC 18: See Exhibit CSC-18-1.

Interrogatory CSC 19

FuelCell Energy, Inc.  
Petition No. 923A

Witness: Joseph Ulevicus  
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- Q-CSC 19: Please identify media used for pipe cleaning procedures at the fuel cell facility testing site in accordance with Public Act 11-101, An Act Adopting Certain Safety Recommendations of the Thomas Commission.
- A-CSC 19: The pipe cleaning procedures at the testing site comply with the requirements of Public Act 11-101. See Exhibit CSC-19-1 with a description of the cleaning procedures and medias to be used to clean the natural gas piping at the site.

Interrogatory CSC 20

FuelCell Energy, Inc.  
Petition No. 923A

Witness: Joseph Ulevicus  
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- Q-CSC 20: Referencing Amended Petition p. 2, how many nitrogen cylinders would be stored at the fuel cell facility testing site to support the testing operation? Could these pressurized cylinders explode if exposed to fire?
- A-CSC 20: Nitrogen is not stored in cylinders onsite but piped in from onsite storage tanks on the eastern corner of the property.

Interrogatory CSC 21

FuelCell Energy, Inc.  
Petition No. 923A

Witness: Joseph Ulevicus  
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Q-CSC 21: Referencing Amended Petition, Facility Sound Assessment, Table 7, what is the address of the nearest industrial property to the north (Industrial, N)?

A-CSC 21: The nearest industrial property to the north is Gregor Technologies located at 529 Technology Park Drive, Torrington CT 06790.

Interrogatory CSC 22

FuelCell Energy, Inc.

Witnesses: Omar Morales  
Joseph Ulevicus

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Q-CSC 22: Referencing Amended Petition, Facility Sound Assessment, Table 7, what is the address of the nearest residential property to the south (Residential, S1)? What is the distance from the SureSource 1.4 MW fuel cell facility testing site and the property line of Residential S1?

A-CSC 22: The address of the nearest residential property to the south is 37 Pepper Drive, Torrington CT 06790. The distance is approximately 0.15 miles.

Interrogatory CSC 23

FuelCell Energy, Inc.  
Petition No. 923A

Witness: Joseph Ulevicus  
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Q-CSC 23: Would fuel cells operated at the testing site comply with DEEP air and water quality standards?

A-CSC 23: The fuel cells comply with the applicable DEEP air and water quality standards. The facility operates under the DEEP General Permit for Discharges from Miscellaneous Industrial Users. Additionally, the testing facility does not need an air permit because the facility's potential emissions are below the applicable thresholds.

Interrogatory CSC 24

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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Q-CSC 24: Would the fuel cell operation during testing emit methane (CH<sub>4</sub>)? Explain.

A-CSC 24: Methane is not a typical emitted product of the fuel cell process.



Interrogatory CSC 25

FuelCell Energy, Inc.

Witnesses: Thorsten Kukovicic  
Robert Fournier

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Q-CSC 25: Referencing Amended Petition, p. 2, a carbon sequestration plant or CO<sub>2</sub> recovery was integrated into the 1.4 MW SureSource testing facility. Does this result in a lower CO<sub>2</sub> emissions rate in lbs/MWh than is indicated on the specifications sheet? Explain.

A-CSC 25: Recovered carbon dioxide results in a direct reduction in emitted carbon dioxide from the process. The design capability is the elimination of 10 tons of carbon dioxide per day. During testing, while the equipment is functioning as intended, the carbon dioxide emissions will be reduced by this amount.