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October 12, 2021

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

Re: Petition 1350A - Responses to CSC Interrogatories (Set 1)

Dear Ms. Bachman:

EIP Investment LLC (“EIP”) hereby submits to the Connecticut Siting Council (“Council”) its responses to the Council’s September 28, 2021 interrogatories (Set 1). An original and fifteen (15) copies of EIP’s responses will be hand delivered to the Council.

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

Very truly yours,



Bruce L. McDermott

Enclosures

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Interrogatory CSC-1

EIP Investment, LLC
Petition No. 1350A

Witness: Mark Wick
Page 1 of 1

Q-CSC-1: Referencing page 2 of the Council's Staff Report for Petition 1350A, it states, "In June 2018, the proposed project was selected by the Connecticut Department of Energy and Environmental Protection (DEEP) following a Request for Proposals (RFP) for Class I renewable energy sources pursuant to Section 10 of Public Act 17-144. The DEEP RFP process resulted in a power purchase agreement for 100 percent of the power to be committed to the grid." Please respond to the following regarding the DEEP RFP:

- a) What is the status of the power purchase agreement (PPA) under the RFP?
- b) When was the PPA approved by the Public Utility Regulatory Authority?
- c) What is the term of the PPA? Are there any provisions for extension or renewal of the PPA?
- d) Per the PPA, would renewable energy certificates (RECs) and energy be sold to an electrical distribution company? If yes, which company?
- e) Would any Class III RECs also be created by this facility due to the combined heat and power, or only Class I RECs?

A-CSC-1:

- a) The original PPA was executed in September 2018. The PPA is being amended to change equipment providers from Doosan to Bloom. The language has been agreed to and will be submitted to PURA for review and approval.
- b) The original PPA was approved by PURA in December 2018.
- c) The term of the PPA is 20 years and there is no provision for extension or renewal.
- d) Yes, the RECs and energy will be sold to the EDCs (approximately 80% to Eversource and 20% to UI).
- e) Only Class I RECs will be created by the facility.

Interrogatory CSC-2

EIP Investment, LLC
Petition No. 1350A

Witness: Mark Wick
Page 1 of 1

Q-CSC-2: Would EIP Investment LLC (EIP) participate in the ISO New England, Inc. (ISO-NE) Forward Capacity Auction? If yes, which upcoming auction(s)?

A-CSC-2: Yes, EIP is participating in the ISO-NE Forward Capacity Auction but the project has not yet been accepted.

Interrogatory CSC-3

EIP Investment, LLC

Petition No. 1350A

Witnesses: Greg Oross
and Mark Wick

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Q-CSC-3: Referencing page 2, paragraph 6 of the Council's Staff Report for Petition 1350A, in the event of a power outage, would the Bloom fuel cells "idle" and not provide power to the grid? Would the modified fuel cell facility be capable of providing seamless uninterrupted backup power to the Stanley Black & Decker (SBD) campus, subject to the consent and approval of the electric utilities?

A-CSC-3: In case of a power outage, the Bloom fuel cells will "idle" and not provide power to the grid. Subject to consent and approval of the utilities and the installation of the required equipment, the project could provide back-up power to the SBD campus.

Interrogatory CSC-4

EIP Investment, LLC

Petition No. 1350A

Witnesses: Matt Tobin and

Greg Oross

Page 1 of 1

Q-CSC-4: Referencing Sheet SP-1, please respond to the following:

- a) Would the proposed elevated platform that the fuel cells would be located on be made of concrete and/or steel? Explain.
- b) Provide the area in square feet of the proposed platform.
- c) How high would the elevated platform be above grade?
- d) Would the project fence have barbed wire on top?
- e) Provide the area enclosed by the fence.
- f) What types of equipment is located on the 7 equipment locations depicted on Sheet SP-1, e.g. transformers?
- g) What is the tallest piece of equipment on the fuel cell facility footprint, and how tall would it be above the platform?
- h) Depict the natural gas line, electrical feeder and water supply line (if applicable) connections to the facility on Sheet SP-1.

A-CSC-4:

- a) The elevated platform will be constructed of modular concrete blocks on the perimeter acting as a retaining wall with structural fill placed within the block perimeter to an elevation of approximately 4' above existing grade and then topped with asphalt in between the concrete equipment pads.
- b) The platform is approximately 48,000 square feet.
- c) The height of the platform above grade will be approximately 4'-0".
- d) Yes, the perimeter fence will have barbed wire at the top.
- e) The fence will be inset approximately one foot from the edge of the platform, so the area enclosed by the fence will be approximately 47,000 square feet.
- f) There are 480V-13.8kV transformers, marshalling switchgear, water distribution modules and telemetry modules located on the equipment locations depicted on Sheet SP-1.
- g) The tallest equipment on the fuel cell facility footprint are the fuel cell "Energy Servers" that are approximately 7'6" above finished grade.
- h) See Attachment CSC-4-1.



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CSC PERMIT SET

NO	DATE	REVISION
0	04/30/21	FOR REVIEW: BJP
1		
2		
3		
4		
5		
6		

DESIGN PROFESSIONAL OF RECORD

PROF: BRADLEY J. PARSONS, P.E.
COMP: ALL-POINTS TECHNOLOGY CORPORATION
ADD: 567 VAUXHAUL STREET EXTENSION - SUITE 311
WATERFORD, CT 06385

OWNER: STANLEY BLACK + DECKER INC
ADDRESS: 600 MYRTLE STREET
NEW BRITAIN, CT 06052

NEW BRITAIN FUEL CELL

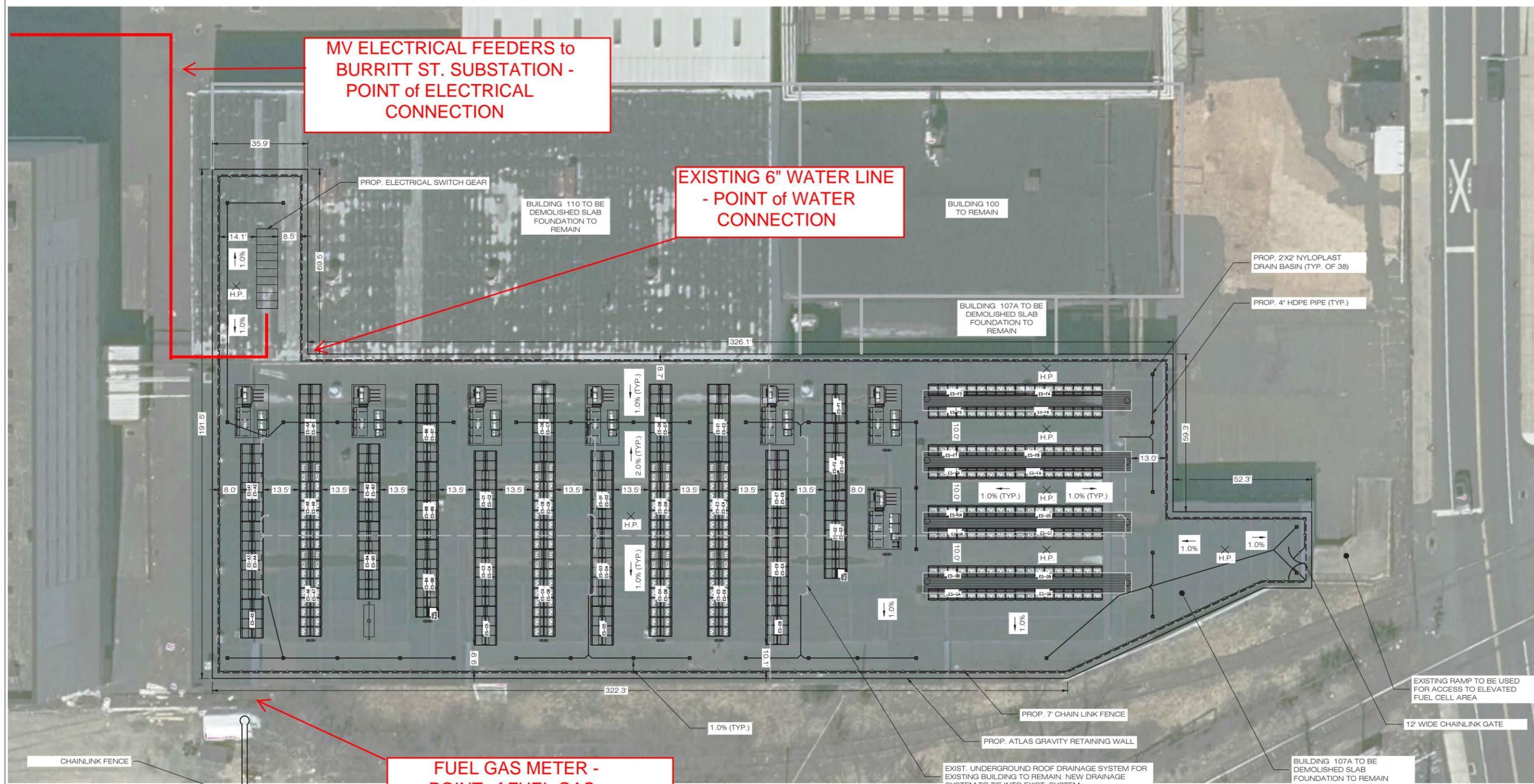
SITE: 100 CURTIS STREET
ADDRESS: NEW BRITAIN, CT 06052

APT FILING NUMBER: CT680100

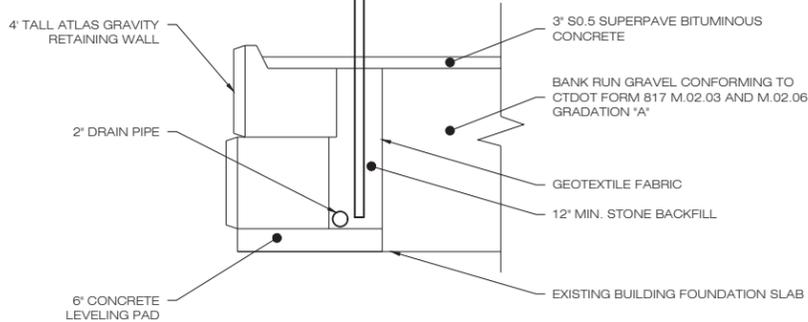
DRAWN BY: BJP
DATE: 04/02/21 CHECKED BY: BJP

SHEET TITLE:
GENERAL ARRANGEMENT PLAN

SHEET NUMBER:
SP-1

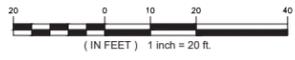


FUEL GAS METER - POINT of FUEL GAS CONNECTION



TYPICAL RETAINING WALL & FILL SECTION

1 GENERAL ARRANGEMENT PLAN
SCALE: 1" = 20'-0"



Interrogatory CSC-5

EIP Investment, LLC
Petition No. 1350A

Witness: Greg Oross
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Q-CSC-5: Referencing the Bloom Energy Server 5 Specifications sheets, please respond to the following:

- a) How many 250 kilowatt (kW) fuel cell units (i.e. ES5-EA2AAN units) would be installed at the site? Provide the dimensions of a typical ES5-EA2AAN unit to be installed at this site.
- b) How many 300 kW fuel cell units (i.e. ES5-YA8AAN units) would be installed at the site? Provide the dimensions of a typical ES5-YA8AAN unit to be installed at this site.
- c) Water consumption is "None during normal operation." Would any water consumption be required at initial system fill and during restart operations? If yes, how many gallons in total would be required for the facility to accommodate each fill?
- d) Would any water be discharged during operations? If yes, what is the total discharge rate for the facility in gallons per minute?

A-CSC-5:

- a) 42 250kW Energy Servers will be installed and will have a typical dimension of 4'4" wide x 28'8" long x 7' tall.
- b) 31 300kW Energy Servers will be installed and will have a typical dimension of 4'4" wide x 32'11" long x 7' tall.
- c) Yes, water consumption will be required at initial system fill and during restart operations. The facility will typically consume approximately 4,380 gallons of water upon system start-up.
- d) No water will be discharged during operations.

Interrogatory CSC-6

EIP Investment, LLC
Petition No. 1350A

Witness: Mark Wick
Page 1 of 1

Q-CSC-6: Provide the total estimated cost of the proposed fuel cell project.

A-CSC-6: The estimated total cost of the Project is \$75,000,000 to \$80,000,000.

Interrogatory CSC-7

EIP Investment, LLC
Petition No. 1350A

Witness: Mark Wick
Page 1 of 1

Q-CSC-7: Do any further system impact or interconnection studies need to be performed for the facility? If yes, provide the status.

A-CSC-7: An ISO Material Modification Determination needs to be performed based on the equipment change from Doosan to Bloom. The project will present the technical data at the end of October when final Power Systems Computer Aided Design analyses will be complete.

Interrogatory CSC-8

EIP Investment, LLC
Petition No. 1350A

Witness: Mark Wick
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- Q-CSC-8: The specifications sheets for Bloom Energy Server 5 units do not appear to include provisions for waste heat utilization. However, referencing page 3 of the August 20, 2021 Testimony of Mark Wick, the Revised Project would have heat recovery capabilities to use high grade and low grade heat. How would the high and low grade waste heat be utilized, e.g. Organic Rankine Cycle or via other methods? Explain.
- A-CSC-8: A heat recovery system is a new option for the Bloom units. The waste heat will be utilized in an absorption chiller to be installed at the Stanley manufacturing facility.

Interrogatory CSC-9

EIP Investment, LLC
Petition No. 1350A

Witness: Greg Oross
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Q-CSC-9: What is the overall efficiency of the proposed facility, taking into account the use of waste heat? Estimate the facility's capacity factor.

A-CSC-9: The overall efficiency of the proposed facility, taking into account the use of waste heat is 50%. The facility's capacity factor is 90%.

Interrogatory CSC-10

EIP Investment, LLC
Petition No. 1350A

Witness: Greg Oross
Page 1 of 1

Q-CSC-10: Would EIP provide fuel cell operation/emergency training for City of New Britain emergency responders?

A-CSC-10: Yes, as part of the building permit application review process, the New Britain Fire Marshall will review the project. During this review, Bloom will offer on-site training to local officials.

Interrogatory CSC-11

EIP Investment, LLC
Petition No. 1350A

Witness: Greg Oross
Page 1 of 1

Q-CSC-11: Please identify media to be used for pipe cleaning procedures at the proposed facility in accordance with Public Act 11-101, An Act Adopting Certain Safety Recommendations of the Thomas Commission.

A-CSC-11: Nitrogen will be used for pipe cleaning procedures.

Interrogatory CSC-12

EIP Investment, LLC
Petition No. 1350A

Witness: Greg Oross
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Q-CSC-12: Would the facility be designed in accordance with the American National Standards Institute and Canadian Standards Association (ANSI/CSA) America FC1-2004 for stationary fuel cell facilities? Would the facility also comply with the National Fire Protection Association (NFPA) 853?

A-CSC-12: Yes, the facility will be designed in accordance with ANSI/CSA America FC1-2004 and NFPA 853.

Interrogatory CSC-13

EIP Investment, LLC
Petition No. 1350A

Witness: Scott Chasse
Page 1 of 1

Q-CSC-13: Would erosion and sedimentation controls be installed consistent with the *2002 Connecticut Guidelines for Erosion and Sediment Control* as applicable?

A-CSC-13: Yes, erosion and sedimentation controls will be installed consistent with the *2002 Connecticut Guidelines for Erosion and Sediment Control*.

Interrogatory CSC-14

EIP Investment, LLC
Petition No. 1350A

Witness: Scott Chasse
Page 1 of 1

Q-CSC-14: Would the project require a Department of Energy and Environmental Protection (DEEP) Stormwater Permit? If yes, has EIP submitted an application to DEEP for such permit?

A-CSC-14: The project will not require a DEEP Stormwater Permit. Although the area of development is 1.1 acres, there is no ground disturbance as the entire proposed facility is atop an existing impervious concrete surface. The facility is designed to funnel stormwater drainage from the new facility directly into the existing roof drainage system, which will not be affected by demolition of Buildings 110 and 107. As a result, there is a net zero increase from existing to proposed drainage volume and discharge.

Interrogatory CSC-15

EIP Investment, LLC
Petition No. 1350A

Witness: Scott Chasse
Page 1 of 1

Q-CSC-15: Describe the visibility of the proposed facility from the surrounding area.

A-CSC-15: The overall visual effect of the facility on the surrounding area will be minimal. The demolition of Buildings 107 and 110 will result in extended views beyond the project area to nearby properties due to the facility's lower profile (height) than the existing buildings. In general, the facility itself will be visible from locations along Myrtle Street and Curtis Street where the existing buildings may be seen, but the lower profile and neutral color will minimize visibility in comparison to the current view. Year-round visibility will be experienced to the northeast along Myrtle Street near Celebration Way and Grove Street, and along portions of Orange Street where existing structures do not intervene. Limited visibility will be experienced from the north, west, south and east due to intervening structures.

Interrogatory CSC-16

EIP Investment, LLC
Petition No. 1350A

Witness: Greg Oross
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Q-CSC-16: Referencing page 4, paragraph 3 of the Council's Staff Report for Petition 1350A, would the desulfurization process produce zinc sulfide that would need to be removed from the fuel cell units approximately every 10 years? Would the waste zinc sulfide be removed by trained personnel and disposed of in accordance with applicable regulatory criteria?

A-CSC-16: Yes, the desulfurization process will produce zinc sulfide that would need to be removed from the fuel cell units. This will occur approximately every 10 years.

Yes, the waste zinc sulfide will be removed by trained personnel and disposed of in accordance with applicable regulatory criteria.

Interrogatory CSC-17

EIP Investment, LLC
Petition No. 1350A

Witness: Greg Oross
Page 1 of 1

Q-CSC-17: Referencing page 4 of the Council's Staff Report for Petition 1350A, provide an updated "Carbon Dioxide Equivalent (CO₂e) Emissions Rates from the Proposed Facility" Table.

A-CSC-17:

CO₂e emission rates from proposed facility

Emission Type	Projected Emissions	GWP in 40 CFR 98, Table A-1	Projected CO₂e
CO₂	72,971 ton/year	1	72,971 ton/year
CH₄	N/A	25	N/A
N₂O	N/A	298	N/A
SF₆	N/A	22,800	N/A
HFC	N/A	12 to 14,900*	N/A
PFC	N/A	7,390 TO 17,340	N/A

Interrogatory CSC-18

EIP Investment, LLC
Petition No. 1350A

Witness: Greg Oross
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Q-CSC-18: Provide a decommissioning plan for the proposed facility.

A-CSC-18: Following the 20-year operational life of the Project, the decommissioning plan is as follows:

1. Isolate, lock out and disconnect all piping for natural gas fuel infrastructure at the gas utility meter set assembly at the site to the fuel processing modules at each Energy Server. Remove gas piping to the unit.
2. Isolate, lock out and disconnect all electrical feeders to the Energy Servers and associated upstream electrical distribution required to safely disconnect the solution from the point of common coupling. This includes power to all Energy Servers and balance of plant ancillary equipment.
3. Return site to original condition with the exception of the site foundations, retaining walls and concrete pads.
4. The decommissioned fuel cells will be removed from the site, disassembled, and the parts will be separated and either recycled, reclaimed or transported to a landfill.

Interrogatory CSC-19

EIP Investment, LLC
Petition No. 1350A

Witness: Greg Oross
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Q-CSC-19: Would any lighting for security and/or maintenance purposes be installed at the fuel cell facility? If yes, what type of lighting would be installed, and how would it impact the surrounding area?

A-CSC-19: No lighting will be installed for security and/or maintenance purposes at the facility.

Interrogatory CSC-20

EIP Investment, LLC
Petition No. 1350A

Witness: Matt Tobin
Page 1 of 1

Q-CSC-20: Would notice be required to Federal Aviation Administration for the facility? If yes, provide the status.

A-CSC-20: No notice to the FAA is required for the facility.

Interrogatory CSC-21

EIP Investment, LLC
Petition No. 1350A

Witness: Matt Tobin
Page 1 of 1

Q-CSC-21: Referencing page 7 of the August 20, 2021 Testimony of Mark Wick, provide the construction hours and days of the week.

A-CSC-21: The construction hours will be Monday through Saturday 7 AM to 5 PM.