STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
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VIA ELECTRONIC MAIL

September 28, 2021

Bruce L. McDermott, Esq.
Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
bmcdermott@murthalaw.com

RE: **PETITION NO. 1350A** – EIP Investment LLC declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 19.98-megawatt combined heat and power fuel cell facility and associated equipment to be located within Building 107 on the corner of Curtis Street and the Pan Am Southern, LLC railroad tracks at the Stanley Black & Decker Campus, 480 Myrtle Street, New Britain, Connecticut. **Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b).**

Dear Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than October 12, 2021. Please submit an original and 15 copies to the Council's office and an electronic copy to siting.council@ct.gov. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the October 12, 2021 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman
Executive Director

MB/MP

Petition No. 1350A
EIP Investments LLC
Interrogatories
September 28, 2021

1. Referencing page 2 of the Council's Staff Report for Petition 1350, 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?

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

3. Referencing page 2, paragraph 6 of the Council's Staff Report for Petition 1350, 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?

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.

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?

6. Provide the total estimated cost of the proposed fuel cell project.

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

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.

9. What is the overall efficiency of the proposed facility, taking into account the use of waste heat? Estimate the facility's capacity factor.

10. Would EIP provide fuel cell operation/emergency training for City of New Britain emergency responders?

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.

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?

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

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?

15. Describe the visibility of the proposed facility from the surrounding area.

16. Referencing page 4, paragraph 3 of the Council's Staff Report for Petition 1350, 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?

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

18. Provide a decommissioning plan for the proposed facility.

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?

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

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