



**VFS, LLC.**  
5827 Terex  
Clarkston, MI 48346

March 3, 2020

**PETITION NO. 1394- VFS, LLC. petition for a declaratory, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 460- kilowatt customer-side fuel cell facility and associated equipment to be located at the Town of Montville Water Pollution Control Facility, 83 Pink Row, Montville (Uncasville), Connecticut**

**RESPONSE TO COUNCIL INTERROGATORIES**

Dear Ms. Bachman,

We are submitting an original and fifteen (15) copies of responses to the Council's interrogatories dated March 2, 2020.

Respectfully Submitted,

Steve Pearson  
Green Energy Financing Executive  
VFS, LLC.  
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**Petition No. 1394**  
**Vending Funding Specialists, LLC**  
**Fuel Cell Installation**  
**83 Pink Row, Montville, Connecticut**

**Interrogatories**

1. In what capacity does Vending Funding Specialists, LLC operate for this project (i.e., as an agent for Doosan)? Will VFS own and operate the facility through its operational life?  
**Response 1: VFS, LLC will install, own and operate the fuel cell installation for 20 years. Doosan Fuel Cell America will supply and maintain the fuel cell under a separate maintenance agreement with VFS, LLC.**
2. Petition p. 2 states the fuel cell would be able to provide for 74% of the building's electrical needs. Several buildings are located on the site, please specify where the generated power would be used.  
**Response 2: The Montville Water Pollution Control Facility at 83 Pink Row is primary metered, with one electrical service providing all of the facilities power needs. The fuel cell connection point will be on the plant side of the Eversource revenue meter so power produced by the fuel cell will be used throughout the facility at all of the buildings.**
3. Petition p. 3 states the fuel cell will have an annual electrical efficiency of 41%. The Doosan specification sheet has slightly differing efficiency values, please clarify. In addition, please clarify what the Peak Overall Efficiency value on the specification sheet represents for this installation.  
**Response 3: The fuel cell will have a lifetime average electrical efficiency of 41% when operating in "high power" mode for the 20 year design life. The 43% electrical efficiency presented on the datasheet is the average performance during year 1 of operation. The peak overall efficiency is the maximum combined heat and power efficiency of the system, on a LHV basis, when all available heat output from the Model 400 system.**
4. Are bollards necessary to protect the fuel cell from impact?  
**Response 4: Bollards will be used to protect the gas meter per gas company specifications. Due to the limited traffic in the location, and the curb present, bollards were deemed unnecessary around the fuel cell.**
5. Petition Attachment 3, p. 1 states the Emergency Response guide shall be shared with local responders, as necessary. Please clarify if VFS will conduct fuel cell safety training with local emergency responders.  
**Response 5: Prior to the Commercial Operation Date a Doosan Fuel Cell America representative will perform a safety briefing for all first responders. A separate written notice will be sent to fire, police and host site management regarding the briefing date and time. A printed site-specific emergency response plan is formally transmitted to the Fire Marshall's office and the host site facilities personnel.**
6. Referring to Petition Attachment 9- Noise Report –provide the following:



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- a) p. 4 states sound mitigation may be recommended due to noise levels at adjacent property lines. What kind of noise mitigation can be deployed at this site to reduce noise levels?  
**Response 6a: The air-cooling module is the primary contributor to noise from the proposed facility. To reduce noise levels from the proposed site an acoustical barrier can be implemented along the south side of the cooling module if final testing of the installed fuel cell requires it.**
- b) p. 17 states the sound levels at locations P6, P7, P8 will exceed the nighttime noise limit of 45 dBA at the southern residential property line. Do residential sound limits apply to the southern property line? Please explain.  
**Response 6b: Residential sound limits do apply to the Southern property line. Once the system is installed and operating additional tests will be performed by Acoustical Testing Inc. to verify the actual sound levels along this property line. If they are found to exceed the allowable limits VFS, LLC. will install engineering controls at the fuel cell site to bring noise levels under the statutory limits.**
- c) Referring to Petition Attachment 9- Noise Report- Figures 3 and 4 show excavations in the area of the proposed fuel cell. Has construction of this Project commenced? If so, under what permit or authority?  
**Response 6c: Construction has commenced under town issued building permit number 82020-0043. VFS, LLC. recognizes the risk of starting construction of the facility. Any design changes required by the Siting Council will be implemented in the completed project prior to starting the fuel cell system.**