



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

July 29, 2021

Bruce L. McDermott, Esq.  
Murtha Cullina LLP  
265 Church Street  
New Haven, CT 06510  
[bmcderott@murthalaw.com](mailto:bmcderott@murthalaw.com)

RE: **PETITION NO. 1406A** – Doosan Fuel Cell America, Inc. petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a grid-side 9.66-megawatt fuel cell facility and associated equipment to be located at 600 Iranistan Avenue, Bridgeport, Connecticut, and associated electrical interconnection to the United Illuminating Company's existing Congress Street Substation. **NuPower Bridgeport FC, LLC 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 August 18, 2021.

Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto: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 August 18, 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,

*s/Melanie Bachman*

Melanie Bachman  
Executive Director

C: Service List dated July 15, 2021

**Petition No. 1406A**  
**Bridgeport 9.66 MW Fuel Cell Project**

**Interrogatories to NuPower – Set 2**  
**July 29, 2021**

21. Can the building be designed into an L shape with 2-story and 3-story sections so that the 2-story section faces Iranistan Avenue?
22. During the desulfurization process, is benzene also removed? If so, would the spent solid waste need to be tested for the presence of benzene and potential characterization as D018 hazardous waste if present in an amount exceeding regulatory criteria?
23. Do the start-up/re-start of the system require auxiliary processes to heat the fuel cells to required operating temperatures?
24. Does ambient humidity negatively affect fuel cell operation? If so, how is humidity negated to mitigate any potential impacts?
25. Referring to Petition p. 8, provide the structure height in relation to the highway elevation.
26. Provide a rendering of the building in relation to the highway that includes the positioning of the exhaust vents.
27. Referring to Petition p. 10, explain what is meant by “extremely small emission levels”.
28. Referring to Petition p. 10- Project Benefits, explain how the project will “upgrade grid infrastructure” and “contribute to grid stability”.
29. Petition p 17, Table 1 indicates project emission of CO<sub>2</sub> at 45,465 tpy. Petition Attachment F indicates 38,026 MT. Please explain the difference.
30. Petition p. 12 indicates “the Project is able to operate on 100% hydrogen fuel rather than the current natural gas supply. This will permit the Project to participate in the coming hydrogen economy over its 20-year life and further reduce greenhouse gas emissions.” How will the hydrogen be delivered to the project?
31. Referring to the response to Council interrogatory 9 - provide a table with projected sound levels at each measurement location with noise values before and after acoustic mitigation and with allowable daytime and nighttime noise limits.
32. Petition p. 22 states dry heated air provided by the dry air-coolers will serve to mix with the exhaust gas to evaporate fog-like water vapor plumes. Provide additional information as to how this process occurs.

33. Petition p. 22 states that during 2016-2020, the modeled plume-induced conditions produced only one hour of icing conditions and three total hours of fog over the five-year period. Is there methodology to forecast when a plume or icing condition will occur in real time? If so, could the unit be shut down to avoid such a situation?

34. Referring to Petition Attachment B- Trinity Consultants Fogging/Icing Analysis;

- a. P. 22, was the plume-induced fog concurrent with the background fog or was it an independent event?
- b. Table 3, why are the number of events for 2016 and 2017 low when compared to 2018, 2019, and 2020?
- c. Has there been any exhaust plume modeling to determine the direction of the plume and the areas affected by the plume?