



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

May 20, 2022

Bruce L. McDermott, Esq.  
Murtha Cullina LLP  
One Century Tower  
265 Church Street, 9<sup>th</sup> floor  
New Haven, CT 06510-1220  
[bmcdermott@murthalaw.com](mailto:bmcdermott@murthalaw.com)

RE: **PETITION NO. 1506** – SCEF1 Fuel Cell, LLC 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 2.8-megawatt fuel cell facility located at 49 Coon Hollow Road, Derby, Connecticut, and associated electrical interconnection to The United Illuminating Company's existing Ansonia Substation.

Dear Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than June 3, 2022. 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 June 3, 2022, 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,

A handwritten signature in black ink, appearing to read "Melanie Bachman".

Melanie Bachman  
Executive Director

MB/MP

c: Service List, dated April 19, 2022

**Petition No. 1506**  
**SCEF1 Fuel Cell, LLC**  
**49 Coon Hollow Road**  
**Derby, Connecticut**  
**Interrogatories**  
**May 20, 2022**

1. Referencing Exhibit C-3 of the Petition, please provide corrected Affidavits of Service of Notice that identify the site location at “49 Coon Hollow Road, Derby, Connecticut.”
2. What is the estimated cost of the proposed project?
3. Referencing page 9 of the Petition, when did SCEF1 Fuel Cell, LLC (SCEF1) meet with City of Derby (City) officials to discuss the proposed project?
4. Referencing page 10 of the Petition, have the Cities of Derby and Ansonia and/or abutters provided comments to SCEF1 since the petition filing? If yes, summarize the comments.
5. Referencing page 15 of the Petition, “The closest residential property and structure is more than 725 feet to the east of the Site.” Provide the address and distance to the nearest residential property line.
6. Are there provisions for any extension of time in the Tariff Terms Agreement (TTA)? Is there an option to renew at the end of the 20-year term?
7. Does the TTA include the transfer of capacity to The United Illuminating Company, or would SCEF1 participate in the ISO-NE Forward Capacity Auction (FCA)? If SCEF1 plans to participate in the ISO-NE FCA, indicate which auction(s) and capacity commitment period(s).
8. Referencing Exhibit A of the Petition, Preliminary Site Plan Sheet 20-0010 and Exhibit E, Emergency Response Plan, Appendix A, Sheet C-004 – Utilities Layout, both drawings are inconsistent in terms of concrete pad and switchgear locations. Please provide the following:
  - a) A corrected version of Sheet 20-0010 including notes and dimensions that are legible;
  - b) A revised version of Sheet C-002 with notes that are legible; and
  - c) A corrected version of Sheet C-004 with the correct map orientation. Please identify proposed fencing and bollards. Also label/identify the rectangular area with “X” diagonals located immediately adjacent to the fuel cell facility.
9. Referencing Sheet C-004, please describe the following:
  - a. the 13.8-kV electrical interconnection
  - b. the natural gas connection; and
  - c. the water/sewer connection.
10. At what pressure in pounds per square inch gauge (psig) would the natural gas be supplied to the fuel cell?
11. Referencing page 13 of the Petition, fuel cell delivery would involve the use of a crane. Would notice to the Federal Aviation Administration be required for temporary use of a crane?

12. What is the general slope/gradient of the project area?
13. What is the voltage of Ansonia Substation? Would the project require any upgrades to the substation? If so, describe the nature of these upgrades.
14. Has SCEF1 consulted with the natural gas utility regarding the adequacy of the existing pipeline/main to serve the fuel cell facility or whether upgrades would be required? Which natural gas utility would serve the fuel cell facility?
15. Would the operation of the fuel cell facility produce any type of vapor plume or cloud? If so, is there a potential for icing in colder temperatures and/or a potential to interfere with air navigation? If so for both, are there any mitigation measures?
16. What is the quantity of oil in the transformers? Will the transformers have secondary containment and/or the use of biodegradable oil?
17. What is the distance of the closest facility associated equipment to Coon Hollow Road? How would the proposed facility's associated equipment be protected from a traffic accident?
18. Page 11 of the Petition states nitrogen will be stored on-site. Are nitrogen tank leaks or ruptures addressed in the Emergency Response Plan? If not, how would SCEF1 respond to any leaks?
19. Referencing Page 13 of Exhibit D – Facility Sound Assessment, it states, “Mitigation measures are engineered into the equipment configuration to keep the Fuel Cell facility cumulative sound within applicable standards.” What mitigation measures are engineered into the equipment configuration?
20. Referencing page 7 of the Petition, SCEF1 indicates that the proposed facility would be enclosed by an approximately eight-foot tall fence. Would the proposed fence surround all four sides of the fuel cell facility? What do the larger squares represent at the limits of the facility along Coon Hollow Road on Sheet C-004? Does the proposed fence comply with the National Electrical Code?
21. What safety/security measures are proposed to protect the fuel cell facility from trespassing, theft, vandalism and/or sabotage?
22. Referencing page 9 of the petition, it states, “the proposed facility will have back-up capabilities.” Explain.
23. Referencing the October 4, 2021 letter from SHPO, it states, “Several nonhistoric sheds are present on within the project area and are proposed to be removed.” Are any of the referenced nonhistoric sheds located on the proposed facility “site,” as that term is defined under Regulations of Connecticut State Agencies §16-50j-2a(29)? If so, please identify the ownership and locations of the nonhistoric sheds and any other existing structures to be removed to accommodate development of the fuel cell site.