

BRUCE L. MCDERMOTT
203.772.7787 DIRECT TELEPHONE
860.240.5723 DIRECT FACSIMILE
BMCDERMOTT@MURTHALAW.COM

September 6, 2023

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

Re: Petition No. 1533A - ReNew Developers, LLC Declaratory Ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a customer-side 4.99-megawatt fuel cell facility and associated equipment to be located at 42 Old Amston Road, Colchester, Connecticut.

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council ("Council") are ReNew Developers, LLC's responses to the Council's first set of interrogatories dated August 17, 2023.

An original and fifteen (15) copies of this filing will be mailed via UPS for tomorrow's delivery to the Council.

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

Very truly yours,



Bruce L. McDermott

Enclosure

Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
T 203.772.7700
F 203.772.7723

Interrogatory CSC-1

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-1: Referencing p. 8 of the Motion to Reopen (MTR) and Exhibit C of the Petition Addendum, has the Town of Colchester, the Town of Hebron or any abutting property owners provided comments to ReNew Developers, LLC (ReNew) since the MTR filing? If so, please summarize the comments.

A-CSC-1: No comments from the Town of Colchester, the Town of Hebron or any abutting property owners have been received since the MTR was filed with the Council.

Interrogatory CSC-2

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-2: Referencing the Town of Colchester's May 14, 2022 correspondence in the original petition and page 7 of the Petition Amendment, is the proposed fuel cell designed to support a community microgrid?

A-CSC-2: The proposed fuel cell is not designed to support a community microgrid.

Interrogatory CSC-3

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-3: Referencing page 7 of the Petition Addendum, describe in detail how the fuel cell facility is configured as a microgrid.

A-CSC-3: Upon an Eversource outage or voltage and frequency conditions that fall outside of the microgrid inter-tie protection relay settings, the project's owned medium voltage electrically operated Microgrid Islanding Circuit Breaker (the "MCB") will open to isolate the data center from the Eversource utility feeder. Local Uninterrupted Power Supply batteries within the Data Center will provide uninterrupted power to the facility in case of a minimal to no interruption of power as the AlwaysON fuel cell plant provides continuous power in a microgrid configuration. Subsequently, the fuel cell project will provide power production and become the sole power source. The MCB will be prevented from reclosing by the synchronism check function and manual confirmation from Eversource's Operations Center will be needed to reconnect to utility power once available.

The proposed project has additional fuel cell energy servers for redundancy and the AlwaysON solution provides power in a microgrid mode with minimal to no interruption of power. Bloom Energy servers are in continuous operation which means there is no risk with cold starts and load transfers.

Interrogatory CSC-4

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-4: Referencing page 7 of the Petition Addendum, ReNew states, "A dedicated gas main will be constructed for the 18 MW facility at Old Amston Road;" however, other portions of the Petition Addendum and the original petition for the 4.99 MW facility indicate interconnection to an existing gas main along the Airline Trail. Please clarify.

A-CSC-4: The natural gas for the 4.99 MW facility will be supplied by the existing Yankee Gas main.

The natural gas for the 18 MW facility will be supplied by a new dedicated Yankee Gas main.

Interrogatory CSC-5

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-5: Provide site plans showing the location of the data center in relation to the approved fuel cell facility and the proposed fuel cell facility.

A-CSC-5: Please see Attachment CSC-5-1 depicting the location of the planned data center.

Interrogatory CSC-6

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-6: Provide the length of the proposed gravel driveway.

A-CSC-6: The driveway extending from Old Amston Road to the fuel cell facility entrance gate will be approximately 725 feet in length.

Interrogatory CSC-7

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-7: Would interconnection of the proposed facility impact gas and water supply to the other two nearby fuel cell facilities?

A-CSC-7: Interconnection of the proposed facility will not impact gas and water supply to the other two nearby fuel cell facilities.

Interrogatory CSC-8

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-8: Would modifications to Judd Brook Substation be required for the interconnection of the proposed fuel cell facility?

A-CSC-8: The proposed connection to the Eversource medium voltage Judd Brook Substation circuit is located at the Northeast corner of the property as shown on Attachment CSC-8-1. Eversource will provide future guidance if this proposed connection is acceptable or whether a direct connection is needed at the Judd Brook Substation. The proposed design will be revised as necessary to comply with the Eversource requirements once known.

Interrogatory CSC-9

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-9: Provide the distance of the new utility pole from the proposed facility interconnection point.

A-CSC-9: See Attachment CSC-8-1. The approximate distance is 500 feet.

Interrogatory CSC-10

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-10: Referencing page 6 of the Petition Addendum, Sheet SP-1 in Appendix A of the Petition and Sheet SP-1 from the original petition, would the fuel cell facilities share the same new utility pole for interconnection? Was the 4.99 MW fuel cell facility interconnection pole relocated?

A-CSC-10: The fuel cell facilities do not share the same new utility pole for interconnection. Each proposed connection to the utility is independent of each other.

The proposed 4.99 MW fuel cell interconnection pole was not relocated. Locations of the utility interconnection points will be finalized during the detailed design phase after coordinating with Eversource.

Interrogatory CSC-11

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-11: Could the construction or operation of the proposed facility impact or interfere with any existing utilities or infrastructure within the surrounding area? If so, identify any measures that would be employed to protect existing utilities or infrastructure from impact or interference.

A-CSC-11: The construction or operation of the proposed facility will not impact or interfere with any existing utilities or infrastructure within the surrounding area.

Interrogatory CSC-12

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-12: Would any nitrogen cylinders be stored on site?

A-CSC-12: No nitrogen cylinders will be stored on site.

Interrogatory CSC-13

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-13: Would lighting be installed at the facility?

A-CSC-13: No lighting will be installed at the facility.

Interrogatory CSC-14

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-14: Would a crane be required for construction? If yes, would notice to the Federal Aviation Administration be required for the temporary use of a crane?

A-CSC-14: A crane will be required for construction. No notice to the Federal Aviation Administration will be required for the temporary use of the crane.

Interrogatory CSC-15

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-15: Has ReNew consulted with the DEEP Dam Safety Division regarding permitting requirements, if any, for the proposed stormwater basin? Is the proposed stormwater basin an excavation-type basin or berm-type basin?

A-CSC-15: ReNew has not consulted with the DEEP Dam Safety Division to date. The proposed basin is predominantly a fill/berm type basin.

Interrogatory CSC-16

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-16: Referencing page 12 of the Petition Addendum has ReNew submitted an application for a General Permit to the Department of Energy and Environmental Protection? If no, approximately when does ReNew anticipate filing for the General Permit?

A-CSC-16: ReNew has not submitted an application for a General Permit to the Department of Energy and Environmental Protection but will do so approximately six months prior to construction.

Interrogatory CSC-17

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-17: For a Department of Energy and Environmental Protection General Permit (GP) on the same parcel as a previous project, could the GP be revised or is a reapplication required? If either, are new historic preservation and Natural Diversity Database reviews required? Explain.

A-CSC-17: No General Permit was required for the project that was the subject of Petition 1533, as the total disturbance was under one acre. The proposed facility that is the subject of the Petition Addendum has no effect on the historic and Natural Diversity Data Base reviews performed for the previously approved project.

Interrogatory CSC-18

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-18: Would the proposed stormwater management basin require periodic maintenance? If so, please provide details.

A-CSC-18: Periodic maintenance will be required to remove accumulated sediment from the basin. Machine removal will be employed if the basin is accessible to machinery. If it is not, sediment will be removed by hand.

Interrogatory CSC-19

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-19: What is the distance of the nearest 100 year flood zone from the facility?

A-CSC-19: The facility's nearest point to the 100-year flood zone is approximately 21 feet from the retaining wall.

Interrogatory CSC-20

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-20: Is the dewatering area located within the 100 year flood zone? What is the impact of this on the drainage swale and nearby wetland?

A-CSC-20: The dewatering area is within the 100-year flood zone. Dewatering activities, implemented in accordance with Connecticut's 2002 Guidelines for Soil Erosion and Sedimentation Controls, will be employed as necessary during construction of the facility. Any potential impacts to nearby wetland areas will be temporary and will not result in a significant negative impact to the hydrology of these resources. No drainage swale is included in the proposed stormwater management design.

Interrogatory CSC-21

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-21: Would it be possible to move the facility in any direction or configuration to increase the distance from the LOD to the wetland?

A-CSC-21: Several configurations of the facility were evaluated to maximize the wetland buffer distance while meeting the building program needs. It was determined that the proposed configuration maximizes the wetland buffer distance to permanent impacts (elements including the retaining wall, stormwater basin, etc.). As noted in the Environmental Assessment, development is within previously disturbed areas and does not entail clearing of mature vegetation or significant grading, thereby minimizing potential impacts to nearby wetlands.

Interrogatory CSC-22

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-22: Referencing Appendix F of the Environmental Assessment, provide the acreage or number of trees six inches in diameter or greater that would be removed for installation of the proposed facility.

A-CSC-22: Five trees six inches in diameter or greater will be removed for installation of the proposed facility.

Interrogatory CSC-23

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
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Q-CSC-23: Referencing page 18 of the Petition Addendum, a modular block retaining wall is proposed at the nearest point of the proposed fuel cell facility to the wetland. Page 17 indicates the nearest point of the fuel cell facility would be a grass lined stormwater basin at the southwest corner of the site located 22 feet east of the wetland. How was the location determined? Why is the retaining wall necessary?

A-CSC-23: All wetland buffer distances were determined in AutoCAD calculated from the limit of disturbance to the delineated wetland boundary. The following wetland buffer distances are provided for clarity:

Distance from the bottom of the retaining wall to wetlands is approximately 21 feet.

Distance from the nearest point of grading associated with the bottom of the stormwater basin is approximately 34 feet (approximately 50 ft. to the top of the stormwater basin top of berm).

Distance from the facility fence is approximately 33 feet.

The proposed retaining wall reduces the grading requirements and thereby maximizes the buffer distance to wetlands. If the retaining wall were eliminated, grading would extend farther to the east and south, potentially resulting in direct wetland impacts.

Interrogatory CSC-24

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-24: Page 18 of the Petition Addendum states, "The construction of this retaining wall will cause temporary impacts in adjacent upland areas within 1.5 feet of the wetland..." Please elaborate on the temporary impacts.

A-CSC-24: Temporary impacts associated with construction of the retaining wall include the excavation and grading to install the retaining wall footings, and associated erosion and sedimentation perimeter controls.

Interrogatory CSC-25

ReNew Developers, LLC
Petition No. 1533A

Witness: Peter Carli
Page 1 of 1

Q-CSC-25: Referencing page 16 of Exhibit A of the Petition Addendum, approximately how much clearing of edge forest (acres or number of trees 6 inches in diameter at breast height or greater) would occur to develop the proposed fuel cell facility?

A-CSC-25: Less than 0.1 acre of edge forest clearing, consisting of transitional scrub/shrub and early successional edge forest, will be required to develop the proposed fuel cell facility.

