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September 21, 2022

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

Re: Petition of ReNew Developers, LLC for a Declaratory Ruling, Pursuant to Connecticut General Statutes §4-176 and §16-50k, for the Proposed Construction, Maintenance and Operation of a 4.0-megawatt fuel cell Facility to be Located at 234 Riverside Avenue, Bristol, Connecticut, and Associated Electrical Interconnection

Dear Ms. Bachman:

Pursuant to Connecticut General Statutes Sections 4-176 and 16-50k(a), ReNew Developers, LLC hereby submits to the Connecticut Siting Council a Petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is necessary for the installation of a 4.0 megawatt fuel cell facility, including associated equipment and related site improvements (collectively, the "Project") located at 234 Riverside Avenue, Bristol, Connecticut (the "Property").

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

Very truly yours,



Bruce L. McDermott

Enclosure

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STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Petition of ReNew Developers LLC for a Declaratory Ruling, : Petition No.
Pursuant to Connecticut General Statutes §4-176 and §16- :
50k, for the Proposed Construction, Maintenance and :
Operation of a 4.0-Megawatt fuel cell Facility to be Located :
at 234 Riverside Avenue, Bristol, Connecticut, and :
Associated Electrical Interconnection : September 21, 2022

Petition for Declaratory Ruling of ReNew Developers LLC

I. Introduction

Pursuant to Section 16-50k(a) and Section 4-176(a) of the Connecticut General Statutes ("CGS") and Section 16-50j-38 et seq. of the Regulations of Connecticut State Agencies ("RCSA"), ReNew Developers LLC ("ReNew" or the "Company") requests that the Connecticut Siting Council ("Council") issue a declaratory ruling that a Certificate of Environmental Compatibility and Public Need is not required for ReNew's proposed location, construction, operation and maintenance of a 4.0-megawatt ("MW") fuel cell, an electrical interconnection, and associated equipment (together, the "Project"). The Project will be located at 234 Riverside Avenue in Bristol, Connecticut.

As discussed more fully in this petition, the construction, operation and maintenance of the Project satisfies the statutory elements of CGS § 16-50k(a)¹ and will

¹ CGS Section 16-50k(a) provides, in pertinent part:

"Notwithstanding the provisions of this chapter or title 16a, the council shall, in the exercise of its jurisdictions over the siting of generating facilities, approve by declaratory ruling . . . (B) the construction or location of any of any fuel cell, unless the council finds a substantial adverse environmental effect, or of any customer-side distributed resources project or facility or grid-side distributed resources project or facility with a capacity of not more than sixty-five megawatts, as long as: (i) Such project meets air and water quality standards of the Department of Energy and Environmental Protection, (ii) the council does not find a substantial adverse environmental effect...".

not have a substantial adverse environmental effect. Accordingly, this Petition for a Declaratory Ruling should be approved by the Council.

II. Background

A. Petitioner

ReNew is a recently formed limited liability company that has a principal place of business at 103 South Main St-#734, Colchester, CT 06415. The Company is engaged in property development, including the construction of renewable energy facilities in Connecticut. ReNew is significantly invested in the energy sector and currently has a diverse portfolio of renewable energy projects in its pipeline. Concurrently with this Project, the Company is seeking the Council's approval for the construction of a 4.99 MW fuel cell facility in Colchester, Connecticut. See Petition No. 1533.

The Company will work with a group of industry experts in the development of the Project. Bloom Energy Corporation ("Bloom Energy") will provide the thirteen (13) Bloom Energy Servers for the Project and will be responsible for the installation, maintenance and operation of the units. Bloom Energy has installed over 700 of its non-combustion solid oxide fuel cell systems across the U.S. and in other countries including Japan, and in Connecticut alone, it has deployed more than 10 MW of renewable energy.

All correspondence and/or communications regarding this Petition should be addressed to:

John Matheson
ReNew Developers, LLC
103 South Main Street # 734
Colchester, CT 06415
Email: renewdevelopersco@gmail.com

A copy of all such correspondence or communications should also be sent to ReNew's attorney:

Bruce L. McDermott
Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
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Fax: 203.772.7723
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B. Project

The Project will consist of the construction of a 4 MW natural gas behind-the-meter fuel cell facility that will be used to power an on-site data center. ReNew has entered into an agreement with Yankee Gas Services Company for the supply of natural gas to the facility. The data center is projected to be a four-story building of approximately 40,000 square feet to be constructed alongside the fuel cell facility. See Exhibit A. All the electricity generated by the Project will be used to power the data center. Thus, the Facility will not operate as an emergency generating device or participate in a demand response program. Approximately 99% of the data center's electrical power needs is projected to be served by the fuel cell facility. The remaining 1%, which is expected to be utilized during fuel cell maintenance downtime, will come from an interconnection to The Connecticut Light and Power Company dba Eversource ("Eversource"). The interconnection will also ensure the data center has back-up power in the unlikely event of fuel cell failure. ReNew filed an Interconnection Application on February 8, 2022 that is currently pending. The Company estimates that the Project will cost approximately \$16 million, which will be in its entirety privately funded.

III. Description of the Project

A. Overview

1. Site

The Project will occupy approximately 0.44 acres (the “Project Area”) of a 1.62-acre property located at 234 Riverside Avenue in Bristol, Connecticut (the “Site”), at the intersection of Riverside Avenue (State Route 72) and East Street. The Site is a remediated brownfield, which formerly housed an auto sales and service business.

The Site is located within Bristol’s Enterprise Zone and it is surrounded by commercial development along the Route 72 corridor and residential properties beyond that to the north. See Figure 1. On the south side, there is the Pequabuck River and further south Memorial Boulevard, the Memorial Boulevard Park and more residential properties. The Site’s existing topography is generally level, ranging from approximately 273 feet to 286 feet above mean sea level.

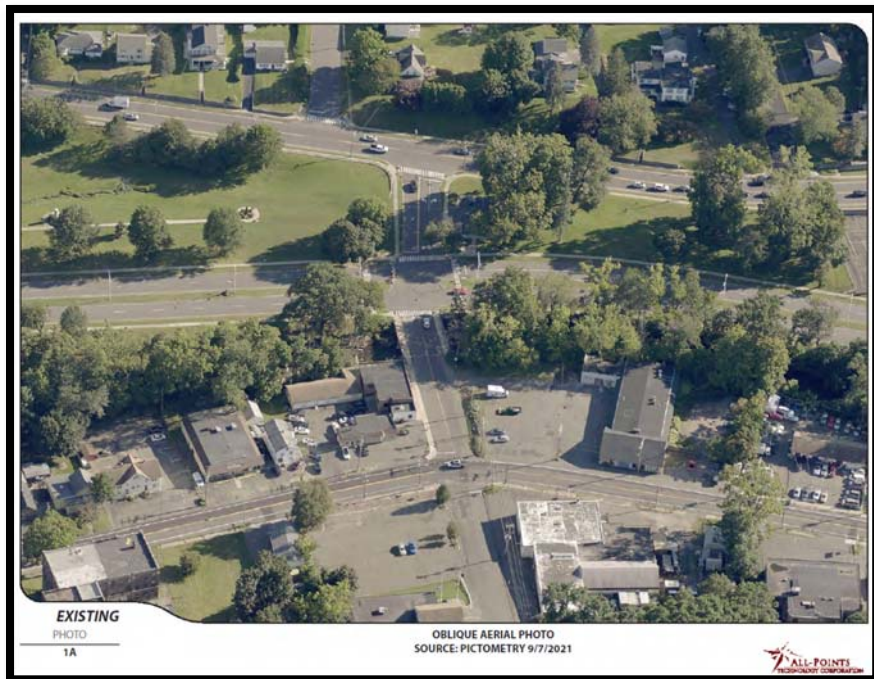


Figure 1: Project Site (Aerial View)

2. Facility Design Specifications

The fuel cell facility will consist of thirteen (13) solid oxide fuel cell Bloom Energy Servers, ten (10) 325-kW units and three (3) 250-kW units, capable in combination of producing 4 MW of power, and associated equipment including four (4) water distribution modules, two (2) telemetry cabinets, two (2) power distribution modules and two (2) step-up transformers (collectively, the "Facility"). See Bloom Energy Server 5 Equipment Specification Sheets attached hereto as Exhibit B. The Facility will be constructed on the eastern portion of the Site. The fuel cell equipment will be installed on an approximately 82 feet by 115 feet, gravel-surfaced compound, which will be surrounded by an eight (8)-foot tall chain link fence.

The Project will be interconnected for backup and/or supplementary power to the grid. The Facility will use natural gas and will require 1,248 gallons of water on startup (96 gallons per Bloom Energy Server). The Facility will not burn natural gas, but merely use it in a chemical reaction to generate electricity. The natural gas will be digested almost immediately upon entering the fuel cell unit and will no longer be combustible. Furthermore, other than the initial water injection, the Facility will not use water once operative, and thus, there will not be any water discharges under normal operating conditions. Underground service connections to existing natural gas and water lines will be constructed to supply the Facility with the required water and natural gas. The water interconnection will extend easterly 45 feet to the main on East Street. The natural gas interconnection will extend through the southern end of the facility then easterly onto East Street and then approximately 300 feet south on East Street to a gas main as per an agreement with Yankee Gas. The Facility will be accessed from East Street via a gravel

drive at the south side of the Project Area; gates will be located at the northwest and southwest corners of the Facility.

B. Project Benefits

As a Class I renewable energy facility, the Project will contribute to Connecticut's renewable energy portfolio standards and will advance the state's renewable energy goals by providing constant and reliable generation of electricity. The Project will deliver on-site generation that increases power quality and resiliency and will reduce energy costs, as well as deliver other energy and environmental benefits. Furthermore, Bloom Energy's fuel cells are designed to generate power on a continuous basis, and thus, they can be configured to reduce the need for traditional backup power equipment. The Bloom Energy system also operates at high availability due to its fault-tolerant design; this permits the Bloom Energy Servers to continue to provide power during grid events. Lastly, the proposed fuel cell system will have black start capability, and thereby, be capable of providing uninterruptable power to the data center in the event of a blackout.

The Bloom Energy Servers will deliver clean power, consistent with the goals of Connecticut's Global Warming Solutions Act to reduce greenhouse gas emission levels. Additionally, the Project will foster the redevelopment and reuse of an underutilized property - the 234 Riverside Avenue property.

C. Municipal Consultation and/or Community Outreach

ReNew has contacted the City of Bristol to introduce the Project. Specifically, on September 1, 2022, the Company met with Mayor Caggiano to discuss the Project and its potential benefits. To this date, ReNew has received positive feedback about the

Project from Mayor Caggiano and the City of Bristol's Economic and Community Development Director, Justin Malley.

D. Public Notice

ReNew has provided notice of this petition via certificate of mailing to all persons and appropriate municipal officials and governmental agencies to whom notice is required to be given pursuant to RCSA § 16-50j-40(a).² Sample copies of the notice letters and service lists are attached. See Exhibit C.

IV. No Substantial Adverse Environmental Effect

As discussed more fully in the Project's Environmental Assessment, prepared by All-Points Technology Corporation, P.C. (attached hereto as Exhibit D), the Project will have no substantial adverse environmental effect.

A. Environmental Effects

1. Air Quality Impact

The Project will not cause any adverse air quality impacts. The Facility will meet all applicable state and federal air quality standards. The Project will be located in a serious non-attainment area for ozone. The total potential emissions for the fuel cell facility, assuming continuous year-round full power operation, are calculated to be:

² RCSA § 16-50j-40(a) in part provides:

"Prior to submitting a petition for a declaratory ruling to the Council, the petitioner shall, where applicable, provide notice to each person other than the petitioner appearing of record as an owner of property which abuts the proposed primary or alternative sites of the proposed facility, each person appearing of record as an owner of the property or properties on which the primary or alternative proposed facility is to be located, and the appropriate municipal officials and government agencies...The term "appropriate municipal officials and government agencies" means, in the case of a facility required to be approved by declaratory ruling, the same officials and agencies to be noticed in the application for a certificate under Section 16-50l of the Connecticut General Statutes..."

Criteria Pollutant/ Greenhouse Gas	Total Potential Emissions (lb/MWh)
Nitrogen Oxides (NO _x)	<0.01
Carbon Monoxide (CO)	<0.05
Particulate Matter (PM)	Negligible
Sulfur Oxides (SO _x)	Negligible
Volatile Organic Compounds	<0.02
Carbon Dioxide (CO ₂) ³	679 - 833

Table 1: Project Total Emissions

Table 1 shows that the total potential emissions for the Project will be less than 15 tons per year for any individual air pollutant or greenhouse gas. For this reason, total emissions from the Project will be below levels that will render the Project a “major stationary source” as defined in RCSA § 22a-174-1(65) or a major source of hazardous air pollutants. Consequently, neither a New Source Review permit nor a Title V permit will be required for the construction and operation of the Facility. Additionally, the Project will be considered a minor stationary source and will not be subject to Non-Attainment New Source Review or require emission offsets for its construction.

Emissions resulting from construction-related activities including those associated with mobile sources will be minimal and temporary. Such emissions will be mitigated using available measures, including limiting idling times of mobile equipment; proper maintenance of all vehicles and equipment; and watering/spraying to minimize dust and particulate fugitive emissions. In addition, all on-site and off-road equipment will meet the latest state and federal emission standards for diesel engines.

³ Carbon dioxide emissions are measured at Bloom Energy’s stated lifetime efficiency level of 53-60%.

The Facility will ultimately displace less efficient fossil fueled marginal generation on the ISO New England system. Based upon the most recent US Environmental Protection Agency (“EPA”) “eGrid” data (EPA EGRID 2020 (January 2022) US, 3 Carbon dioxide emissions are measured at Bloom Energy’s stated lifetime efficiency level of 53- 60%. 10 non-baseload), the proposed Facility is expected to reduce carbon dioxide emissions by approximately 13% while emitting virtually no criteria air pollutants.

2. Water Quality Impact Including Aquifer Protection Areas

The Project will comply with the applicable water quality standards. As previously discussed, once operative, there will be no potable water uses or sanitary discharges associated with the Facility, under normal operating conditions. The Facility will require a 1,248-gallon water injection on start-up. For this reason, the proposed Facility will have a water connection to the Bristol Water Department public water system.

The Project Site will not be located within a Public Water Supply Watershed. The Pequabuck River traverses the southern portion of the Site. Nonetheless, the Project will have no adverse environmental effect on either ground water quality or surface water quality. Additionally, because the Project will replace existing pavement with gravel, a decrease in stormwater runoff is anticipated.

The Project has been designed and will be constructed and operated in accordance with the 2004 Connecticut Stormwater Quality Manual and the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control. In addition, the Company will employ best management practices, including those listed in a Resource Protection Plan (to be implemented by ReNew), to safeguard water resources such as the Pequabuck River from potential impacts. Upon completion of Project construction, the

area outside the fenced Facility and the gravel parking and turnaround area will be seeded with permanent semi-shade grass and forbs mix.

Lastly, as the Project Area is less than one acre, the Project will not require a Connecticut Department of Energy and Environmental Protection (“DEEP”) General Permit for Discharge of Stormwater and Dewatering Wastewaters for Construction Activities. And the Site is not located within or in close proximity to a mapped (preliminary or final) DEEP Aquifer Protection Area.

3. Hazardous Materials (Natural Gas Desulfurization Process, Materials Storage/Shipping)

The Facility will not produce any by-products. Further, although operation of the fuel cell units will require the removal of sulfur odorant compounds, these compounds will not be released on-site and the containers storing them will be shipped off-site to be recycled and/or repurposed.

The first step in the production of electricity in a Bloom Energy Server consists of the removal of sulfur odorant compounds that the gas utility company injects into the natural gas. This process occurs in a desulfurization unit (the “Desulf Unit”), a specialized canister within the Bloom Energy Server comprising of filtering media and a composite copper catalyst that are used to remove the sulfur odorant compounds from the natural gas feedstock. The desulfurization process takes place entirely within the Desulf Unit, which is constantly monitored by Bloom’s Remote Monitoring and Control Center (the “RMCC”) to detect any leaks and institute the appropriate shut down procedures. To this date, there has never been a leak from a Bloom Desulf Unit.

Approximately every fifteen to thirty-six months, the Desulf Units are removed and replaced with units containing fresh composite copper catalyst. When the Desulf Units are removed from the Bloom Energy Servers for periodic replacement, the units automatically seal shut to ensure that there is no release of natural gas. The spent canisters, including the used media, are transported to the state of Indiana by a licensed waste transporter, where the Desulf Units are opened for the first time (since they were removed from the Bloom Energy Servers), cleaned, refilled and sent back to the field for reuse. It should be noted that according to the Indiana Department of Environmental Management, Bloom's spent Desulf Units that are sent to the state are excluded from hazardous waste requirements because the contents of the spent media are used to make copper products.

4. Wildlife and Habitat

The Company expects minimal to no impact to wildlife and habitat resulting from the Project. Two habitat types, Riparian and Developed, separated by a narrow transitional ecotone, were identified within the Project Area. These habitats were physically inspected during a field evaluation that occurred on March 23, 2022 and were also assessed using remote sensing and publicly available datasets.

The construction of the Facility will not result in any direct impacts to the Riparian habitat because ReNew is not proposing any tree clearing and construction will take place within the existing Developed areas. The company will also employ erosion and sedimentation control measures to avoid potential secondary impacts to the Riparian habitat during construction. Specifically, the Company will replace existing pavement with gravel along the access road and fuel cell footprint. Therefore, the Project's impacts to

the Developed habitat will consist of improvements in the form of transitioning currently impervious paved surfaces to a more pervious gravel and native seeded buffer.

Project-related impacts to wildlife are also not anticipated because the Project will be constructed within the Developed habitat, which provides limited value to wildlife due to ecological disturbances and the lack of vegetation. There is minimal wildlife habitat in surrounding areas because of development and land uses, although some wildlife species such as racoons, striped skunks, grey squirrels, etc., that are more tolerant of human disturbance and habitat fragmentation may use the area. Due to the relatively small size of this habitat block and surrounding development/disturbance, the Project is not anticipated to result in a significant impact to wildlife. Wildlife utilization along the Pequabuck River is also expected to continue relatively uninterrupted. In addition, operation of the Facility will not result in an adverse effect to wildlife because the Facility will not generate any significant noise or traffic.

State consultation, through DEEP's Natural Diversity Data Base ("NDDB"), and Federal consultation, in accordance with Section 7 of the Endangered Species Act through the U.S. Fish and Wildlife Service's ("USFWS") Information, Planning and Conservation System ("IPaC") for state and/or federally-listed endangered, threatened and special concern species was completed, as applicable. A review of the most recent DEEP NDDB mapping (August 2022) for the Bristol area revealed that no endangered, threatened and special concern species and significant natural communities exist within or proximate to the Site.⁴ Therefore, consultation with DEEP NDDB is not required and the Project will not impact state-listed species.

⁴ The nearest known area of listed species occurs approximately 0.76 mile to the south and is separated by multiple developments.

Based on the results of the IPaC review, one federally-listed threatened species, northern long-eared bat (“NLEB”), was identified to occur in the vicinity of the Site. Suitable NLEB roost habitat includes trees of all types (live, dying, dead, or snag) with a diameter at breast height of three inches or greater. The Project will not require tree clearing, thus, no impacts to NLEB roost habitats are expected. Further, in a letter dated July 19, 2022, the USFWS confirmed that the Project will not likely result in an adverse effect or incidental take of NLEB and does not require a permit from USFWS. Consequently, no further consultation with USFWS is required for the Project at this time.⁵ See Exhibit I.

5. Wetlands and Watercourses

The Project is not expected to adversely affect wetlands or watercourses. During the March 23, 2022 field evaluation, All-Points Technology Corporation, P.C. (“APT”) identified and completed the delineation of portions of a wetland located, at its nearest point, two feet away from the Site and approximately 43.2 feet away from the fenced Facility. The Company will use the area nearest to the wetland for temporary soil staging during construction and after construction is completed, the area will be permanently seeded.

The identified wetland is comprised of a perennial watercourse, the Pequabuck River, which flows in an easterly direction through the southern portion of the Site. The location of this wetland relative to the proposed Facility is depicted in Figure 2.

⁵ On March 23, 2022, the USFWS published a proposal to reclassify the NLEB as Endangered under the Endangered Species Act. The proposed reclassification, if finalized, may trigger a requirement to re-initiate consultation, in which case, ReNew will complete the necessary consultations, as applicable.



Figure 2 : Proposed Site Conditions Map

As previously discussed, the Project will not impact any wetlands because the Project Site will be located within an existing developed area consisting of bituminous pavement. There might be some impacts in areas in close proximity to the wetland due

to the removal of existing pavement and its replacement with gravel. However, to mitigate these impacts, ReNew will implement a Resource Protection Plan, which details monitoring protocols for sensitive areas to minimize the potential impacts. The Resource Protection Plan is listed in Exhibit E of this petition. It should be noted that the erosion and sedimentation control measures will also include additional measures to protect the wetlands.

6. Flood Zones

The Facility will not be located within a 100- or 500- year flood zone. See Exhibit H. A review of the United States Federal Emergency Management Agency (“FEMA”) Flood Insurance Rate Map indicated that the northern portion of the Site, including the Project Area, is located in an area of minimal flooding, typically above the 500-year flood level (an area designated as “unshaded Zone X”). Higher risk flood areas associated with the Pequabuck River are located on southern portions of the Site. For this reason, no special design considerations or precautions relative to flooding will be required for construction of the Facility and the Project is not expected to impact the floodplain or downstream areas.

7. Prime Farmland and Core Forest Resources

The Project will not impact Prime Farmland or Core Forest resources. As illustrated in Figure 2, there are no Prime Farmland Soils within the Project Area. Based on a review of DEEP’s Forestland Habitat Impact map, there is no Core Forest located on the Project Site either. The Facility will be constructed within a previously developed area and its construction will not require any tree removal.

8. Noise Impact

The Project will not produce a noticeable impact on the acoustic environment at existing nearby residences and will not have an unreasonable adverse effect to surrounding properties. Additionally, the Project will comply with the applicable local and state noise ordinances.

The Company commissioned Cavanaugh Tocci Associates (“Cavanaugh Tocci”) to conduct an environmental sound impact analysis of the Project. See Exhibit F. Cavanaugh Tocci analyzed the sound expected to be produced by the Project in light of existing environmental sound levels. To that end, an environmental sound survey was completed to quantify and characterize the existing acoustic environment in the vicinity of the Site. The results of the survey along with data on the sound impacts associated with the Project, as calculated using CadnaA environmental sound modeling software, were used to analyze the Project’s noise impact on the existing acoustic environment.

The acoustic levels associated with the Project were estimated at residential and commercial receptors. The nearest residential receptors, defined under the regulations as Class A, are approximately 450 feet north and south of the Facility and where the most stringent limit of 51 Dba applies. The Facility is also surrounded on the north, east and west sides by commercial properties and on the south by a park, Class C receptors with a noise sound level limit of 66 Dba. Cavanaugh Tocci’s analysis predicts that Facility sound impacts are expected to be 55 Dba or lower at all receptor property boundaries and 42 Dba or lower at existing residences. See Figure 3. Consequently, the sounds projected to be emitted by the Project will be in compliance with the Connecticut Regulations for the Control of Noise, RCSA §§ 22a-69-1 to 22a-69-7.4 and the City of

Bristol noise ordinance, §§ 15-16 through 15-40 of the Bristol Code of Ordinances,⁶ and the Project will have no material noise impact on the surrounding area.



Figure 3: Acoustic levels of the Facility at property boundaries and nearest residences

9. Visual Impact and Scenic Values

The Project will have minimal to no impact on the visual character of the views experienced from the immediate area. See Figures 4 and 5. Commercial development exists along Riverside Avenue/Route 72 immediately to the north, east and west of the Site. Memorial Boulevard and the Memorial Boulevard Park (the “Park”) are to the south. Although occasional views of the Project may be experienced from points along Memorial Boulevard and within the Park, these views will be obstructed by existing mature vegetation. Further, no state or local designated scenic roads, scenic areas or CT Blue

⁶ The noise level standards of the Connecticut noise regulations and the City of Bristol noise ordinance are relatively the same.

Blaze Hiking Trails are located near the Site. Consequently, no scenic and recreational areas will be physically or visually impacted by construction of the Project.

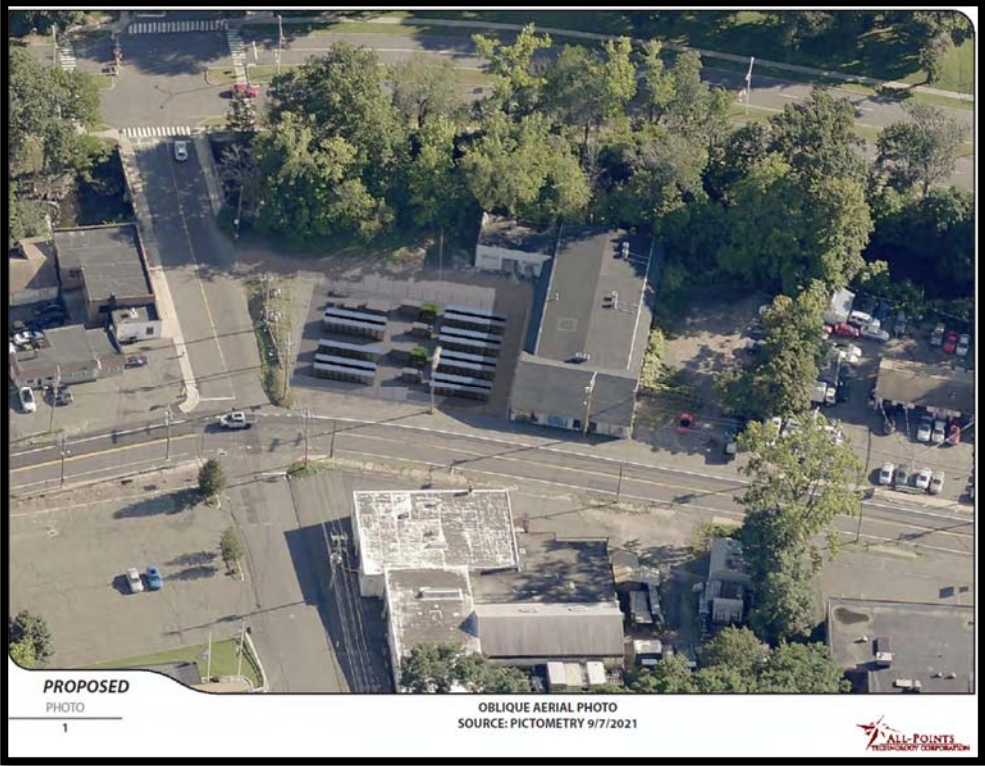


Figure 4: Proposed Site (Aerial View)



Figure 5: Proposed Site (View from Curtis Street)

10. Public Health and Safety

The Project will be designed, constructed and operated in such a manner as to ensure compliance with all applicable local, state, national and industry health and safety standards and requirements related to electric power generation. In accordance with Bloom Energy's protocols, the Facility will be factory-assembled and tested prior to its installation at the Site. The fuel cell units will be equipped with extensive hardware, software and operator safety control systems and will be remotely monitored by Bloom Energy through their RMCC. If warranted, an RMCC operator can initiate an emergency shutdown of the Facility. Additionally, the units will have internal sensors that will continuously monitor system operation and other system components capable of shutting down the units if safety circuits detect a condition outside normal operating parameters.

The Facility will be installed in accordance with the National Fire Protection Association 853 standards, and thereby meet all applicable fire prevention and fire protection requirements for safeguarding life and physical protection associated with facilities that employ stationary fuel cell systems.

The Facility will be enclosed by an eight (8)-foot tall chain link fence. The entrance to the Facility will be gated at the northwest and southwest corners of the Project Area, to limit access to authorized personnel only. All City emergency response personnel will be provided access via a Knox padlock and ReNew will offer to provide training. An Emergency Power Off (“EPO”) button will be installed on-site that can be used to power off the Facility if an external issue arises. The EPO will be accessible to the local fire department and any trained personnel with the appropriate security clearances. The RMCC will also have the ability to remotely de-energize the Facility in the case of an emergency.

In accordance with the Council’s Final Decision in Docket NT-2010, the Project will have a customized Emergency Response Plan (“ERP”). See Exhibit J. Prior to commencement of operations, ReNew and/or Bloom Energy will discuss the Project and ERP with the City of Bristol’s Fire Department and provide on-site training to local emergency responders, if requested. Copies of the ERP will be provided to the City’s Fire Department personnel and local emergency responders. The Facility’s maintenance and pipe cleaning procedures will meet the requirements of Public Act 11-101 and Docket NT-2010. Nitrogen will be used to complete the required pipe cleaning.

The Project will not have any adverse impacts on local roadways or traffic conditions. ReNew does not anticipate that the Project will have a significant impact on

traffic flow. Any potential construction-related traffic will be temporary and restricted to the Project's construction period. During operation, there will be no traffic disruptions because the Site will be operated remotely. Prior to the delivery of any large equipment, if necessary, ReNew will coordinate with local authorities to minimize potential impacts of Project-related construction on existing traffic patterns and roadways.

11. Historical Values

The Project will have no adverse effects on the state's historic or archaeological resources. APT, on behalf of Renew, retained Heritage Consultants, LLC ("Heritage") to conduct an archaeological assessment of the Project. See Exhibit G. Specifically, Heritage reviewed relevant historic and archaeological information, e.g., historic maps and aerial images of the Site, files maintained by the Connecticut State Historic Preservation Office ("SHPO"), etc., to determine whether the Site holds potential historic or cultural resource significance.

Heritage's review revealed that five (5) National Register of Historic Places ("NRHP") and one State Register of Historic Places ("SRHP") listed property are located within a half mile of the Site. Heritage determined that the NRHP listed properties will not be impacted directly or indirectly by the proposed Facility because of their distance from the Site and intervening vegetation. The SRPH listed property appears to have been demolished. No previously identified archaeological sites were found to be located within a half mile of the Project Area.

A copy of the report was sent to SHPO; the results of SHPO's review will be provided to the Council upon becoming available.

12. FAA Determinations

The nearest airports and/or heliports to the Facility are Robertson Airport approximately 3.9 miles to the northeast, Waterbury Airport approximately 6.5 miles to the southwest, Otis Helistop Division of UTC Heliport approximately 7.3 miles to the northeast and AJ Oster Company Heliport approximately 7.5 miles to the southwest. The Project will have a maximum height of approximately 10 feet above ground level, below the Federal Aviation Administration (“FAA”) notification requirements of 14 Code of Federal Regulations, Part 77.9. For this reason, ReNew will not be providing notification to the FAA of the Project.

V. Project Construction, Maintenance and Decommissioning Plan

ReNew anticipates that construction of the Project will commence in September 2023 with the Facility being operational by June 2024. The data center is projected to be constructed concurrently with the Facility. The Company will coordinate construction hours for the Project with the City of Bristol to the extent needed, but generally construction will be taking place Monday through Friday, between 7:00 a.m. to 7:00 p.m. If construction work is required during the weekends, such work will occur between 9:00 a.m. to 6:00 p.m.

The operational life of the Facility is 25 years, as stipulated in the operations and maintenance agreement (the “O&M Agreement”) between ReNew and Bloom Energy. Upon termination of the agreement, including any extension(s) thereof, the Facility will be decommissioned in accordance with the following Decommissioning Plan:

- A. Isolate, lock out and disconnect all piping for natural gas fuel infrastructure at the gas utility meter set assembly at the site to the fuel processing modules at each Energy Server. Remove gas piping to the unit.
- B. Isolate, lock out and disconnect all electrical feeders to the Energy Servers and associated upstream electrical distribution required to safely disconnect the solution from the point of common coupling. This includes power to all the Energy Servers and balance of plant ancillary equipment.
- C. Return the portion of the Site where the fuel cell facility is located to its original condition with the exception of the Site foundations and retaining walls.
- D. The decommissioned fuel cells will be removed from the Site, disassembled, and the parts will be separated and either recycled, reclaimed or transported to a landfill.

As previously stated, Bloom Energy will be responsible for performing the appropriate maintenance to the fuel cell equipment, in accordance with the terms of the O&M Agreement. This includes replacing the solid oxide media in the fuel cells approximately every five years.

VI. Conclusion

For the reasons stated herein, ReNew respectfully requests that the Council rule that the Project as described will not have a substantial adverse environmental effect, and consequently, pursuant to CGS § 16-50k, will not require a Certificate of Environmental Compatibility and Public Need.

Respectfully submitted,

RENEW DEVELOPERS, LLC.

A handwritten signature in blue ink, appearing to read "Bruce L. McDermott", is written over a horizontal line.

By: _____

Bruce L. McDermott
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Table of Exhibits

Exhibit A: Site Plan and Site Photographs

Exhibit B: Bloom Energy Server 5 Equipment Specification Sheet

Exhibit C: Public Notice Documentation (Service Lists, Sample Notice Letters, Affidavits and Abutters Map)

Exhibit D: Environmental Assessment

Exhibit E: Resource Protection Plan

Exhibit F: Facility Sound Assessment

Exhibit G: Archaeological Assessment

Exhibit H: FEMA Flood Maps

Exhibit I: NDDDB and USFWS Determinations

Exhibit J: Emergency Response Plan