

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

KCE CT 9, 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 5.0-megawatt AC battery energy storage facility located at 2 Ella T. Grasso Turnpike, Windsor Locks, Connecticut and associated electrical interconnection.	Petition No. 1579
	August 8, 2023

Petitioner KCE CT 9, LLC (“KCE”) hereby submits the following responses to the Interrogatories that were directed to KCE by the Connecticut Siting Council (“CSC” or “Council”) on July 18, 2023.

Project Development

1. **Has KCE received any comments since the Petition was submitted to the Council? If yes, summarize the comments and how these were addressed.**

No additional comments or questions have been received by the project since the submission of the Petition to the Council.

2. **If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?**

The following permits are necessary for the construction and/or operation of the Project:

- Town of Windsor Locks, Building Permit;
- Town of Windsor Locks, Electrical Permit;
- Federal Aviation Administration (“FAA”) Notice of Proposed Construction and Determinations of No Hazard; and
- Council approval.

It is anticipated that KCE will be the entity that holds these permits.

3. **What is the estimated cost of the project? How are costs recovered? Is the energy being purchased at market rates?**

KCE objects to this interrogatory to the extent it seeks information that is beyond the scope of a petition to declaratory ruling as provided for under the Public Utility Environmental Standards

Act, Conn. Gen. Stat. §16-50g, *et seq* (“PUESA”). In addition, KCE believes that its cost information consists of trade secrets that are protected from disclosure under Connecticut’s Freedom of Information Act, Conn Gen. Stat. §1-200 *et seq* (“FOIA”). Subject to the foregoing objection, KCE replies that it has provided the Council with a Motion for Protective Order, accompanying Affidavit of Taylor Quarles, which was sent to the Council in a separate filing and contains an answer responsive to this interrogatory.

4. **Referencing page 2 of the Petition, was the project selected for the state Energy Storage Solutions Program? If yes, when was the project selected and what program incentives apply to the project?**

The project is a proposed stand-alone energy storage system that will participate in wholesale energy, capacity, and frequency regulation markets. The Energy Storage Solutions (“ESS”) program aims to incentivize residential, commercial, and industrial customers to consider adding storage at their homes or businesses with application to retail customers. As such, the ESS program in its current form does not appear to be applicable to the proposed project, and KCE has not sought to participate in the program.

5. **What is the term of the agreement for KCE to provide energy storage, and with which entity? If the facility operates beyond the terms of such agreement, will KCE decommission the facility or seek other revenue mechanisms?**

KCE objects to this interrogatory to the extent it seeks information that is beyond the scope of a petition to declaratory ruling as provided for under PUESA. Subject to the foregoing objection, KCE states that the project does not currently have an agreement with any entity to provide energy storage, however, KCE plans to participate in an anticipated Public Utilities Regulatory Authority (“PURA”) program that is anticipated to incentivize front-of-the-meter, distribution-connected, medium scale (<20MW) energy storage projects. Additionally, the project will participate in the ISO-NE Forward Capacity Market 18 with the objective of winning capacity supply obligations for the capacity year 2027-28 and subsequent capacity years. The project may also participate in the energy-only markets and the frequency regulation markets as different needs and market opportunities arise. Because there is no agreement in place, the second question in Interrogatory Number 5 does not apply to this project.

6. **If KCE transfers the facility to another entity, would KCE provide the Council with a written agreement as to the entity responsible for any outstanding conditions of the Declaratory Ruling and quarterly assessment charges under CGS §16-50v(b)(2) that may be associated with this facility, including contact information for the individual acting on behalf of the transferee?**

If KCE transfers to another entity, KCE will provide notice of the entity responsible for management and operations of the project and any outstanding conditions of the Declaratory Ruling and said entity’s contact information.

Proposed Site

7. **Submit a map clearly depicting the boundaries of the battery energy storage facility site and the boundaries of the host parcel(s). Under Regulations of Connecticut State Agencies (RCSA) §16-50j-2a(29), “Site” means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located.**

The Revised Figure 4, attached hereto as **Exhibit A**, includes the Host Parcel and project components, and provides the information being sought in this Interrogatory.

8. **What are the benefits of the proposed site location? For example, is the proposed site located within a “load pocket” area or on the “grid edge”?**

Electrically, the project is located within an area on the distribution network with appropriate charging and injection capacity to allow a project of this size to operate without significant network upgrades. Additionally, there are other intermittent generation resources, some operating and some waiting in the queue, within the project’s vicinity. The project indirectly benefits the system due to its ability to draw from resources that may be generating at a time of low demand and subsequently making that energy available during periods of higher demand. Further, because the project is located within the greater Bradley International Airport industrial area, there is substantial load that can benefit from this energy time shift activity. As a stand-alone facility, the battery energy storage system (“BESS”) will be able to provide this benefit for a variety of generation resources, which provides greater flexibility for the system.

The proposed project location is also utilizing a previously modified and disturbed site and will thus not require clearing or significant earthwork within or near sensitive natural resources. The project is located within a commercial and industrial zone in Windsor Locks. There will be no impacts to wetlands or other natural resources as a result of this project.

9. **Referencing Figure 3, ALTA/NSPS Land Title Survey:**

- a. **Would KCE use the existing easement for access across the Camrac, Inc. property at 8 Ella Grasso Turnpike (Access Easement A) in order to reach the host parcel from Ella Grasso Turnpike?**

Yes, the Property at 2 Ella Grasso Turnpike has a deeded access easement in the location identified on the project plans that will be used as the project access point.

- b. **Would KCE use the existing 20’ right to grade and fill on the Camrac, Inc. property at 8 Ella Grasso Turnpike to develop the facility site?**

The project has been designed to have no impact on this area. No earthwork, grading, filling or construction or laydown activities will be conducted in the noted area.

Energy Output

10. How will the facility be dispatched and by whom?

Currently, there are no obligations for dispatch of the project. The project will be operated by the KCE Remote Operation Center to respond to market signals and opportunities. Dispatch will be conducted in response to these opportunities. Variations may occur in response to capacity supply obligations instructions received by ISO-NE, or if the project chooses to enter into a contract with an entity to provide specific services. Any such contact would be anticipated to include terms and requirements for dispatch management.

11. When would the facility be dispatched (actively and passively) and for what duration?

KCE uses automation software that allows the BESS to continually track and respond to electricity market needs and opportunities. The project will be monitored 24 hours a day and as appropriate, manual overrides may be conducted. The duration of activities will be aligned with the duration of the energy event and the available resources within the BESS.

12. What distribution system benefits (ex. resiliency of critical infrastructure, reliability of the electric system, etc.) would be provided by the facility? How does the facility meet the objectives of the state Energy Storage Solutions program?

KCE objects to this interrogatory to the extent it seeks information that is beyond the scope of a petition to declaratory ruling (as opposed to an application for a Certificate of Environmental Compatibility and public need) as provided for under PUESA. Subject to the foregoing objection, KCE states that the ESS program, as described on the program's webpage, is currently designed to serve residential and commercial customers behind the meter and is not applicable to this project. Please refer to: <https://energystoragect.com> for additional information. The project provides benefits at the electricity market wholesale-level, as envisioned by Public Act 21-53, which incentivizes front-of-the-meter (FTM) projects on the distribution network.

The project is being developed in response to Connecticut's goals as an FTM project on the Eversource 23kV 14K7 circuit. The project is located within an area on the distribution network with appropriate charging and injection capacity to allow a project of this size to operate. Additionally, there are other intermittent generation resources, both operating and waiting in the queue, within the project's vicinity. The project will also indirectly benefit the system due to its ability to draw from resources that may be generating at a time of low demand and then subsequently making that energy available during high demand periods. Further, because the project is located within the greater Bradley International Airport industrial area, there is substantial load that can benefit from this energy time shift activity. As a stand-alone facility, the BESS will be able to provide this benefit for a variety of generation resources, which provides greater flexibility for the system.

13. **Is the facility required to reserve any battery storage capability for backup power? Where would the backup power be used and by whom?**

KCE is not currently under contract to provide back-up power to a specific entity. The project will seek to participate in the ISO-NE Capacity Market, and if capacity obligations are awarded, the project will need to be operated in a manner in which it can respond to capacity demand periods per ISO-NE market rules.

14. **Can the facility operate between 0 and 5 MW, or would each module be dispatched based on need?**

The facility can charge and discharge between 0 and 5 MW. The energy management system (“EMS”) divides the total QSE/ISO power setpoint between each power-conversion-system (“PCS”) evenly or in a manner that allows the plant to discharge evenly.

15. **How long will it take for the facility to obtain full output from when it is dispatched?**

In fast frequency response priority mode, the facility may reach full output within 250 milliseconds of the dispatch signal. In normal reserves, priority (P or Q priority mode), the facility ramps to full power output within 4 minutes time.

16. **How long would the facility typically take to fully recharge after a full 20 MWh AC discharge? Would the facility recharge during off-peak hours? Explain.**

The fastest the facility can fully recharge 20 MWh with 5 MW charge at POI is 4 hours and 40 minutes. At this time, it has not been determined exactly when the facility would recharge.

17. **Is the 5 MW AC output based on the point of electrical interconnection?**

Yes, the project location has been selected due to system capacity availability data from Eversource, and further consultation and study performed in cooperation with Eversource to identify the capacity of the system at this location. KCE determined that 5 MW was the appropriate size for the project at this location.

18. **Referencing Petition p. 4, the facility would have a maximum export capacity of 5 MW with a four-hour duration allowing a maximum delivery of 20 MWh. The 12 proposed battery containers have an energy storage capability of 2.752 MWh each or approximately 33.024 MWh in total. Is the remaining balance of approximately 13.024 MWh a reserve storage, due to electrical losses, to prevent a full depletion of the batteries or other reason(s)? Explain.**

The remaining balance of approximately 13.024 MWh of energy is to cover electrical loss, to prevent a full depletion of the batteries, and to cover degradation loss over the system’s life. A full depletion of the batteries would cause batteries to degrade faster and would cause voltage regulation issues on the MV bus, and thus also on the HV bus, and would cause setpoint deviation issues. Batteries also degrade over time. To meet POI energy requirements throughout the project’s anticipated useful life, KCE intends to maintain additional energy storage. In four to five years, KCE will add or replace batteries to maintain contracted energy capacity. For example, during

initial battery plant installation, KCE may only install 10 containers. In five years, KCE will install an additional container. In five more years (on year 10), KCE will install one more container, for a total of 12 containers. Our analysis concludes that amount of energy will satisfy a project with an estimated 20-year life.

19. **Referencing Petition pp. 2, 3 and 9, KCE would participate in the ISO-NE Forward Capacity Market, and the facility would have an in-service date in January 2026. In which auction(s) and capacity commitment period(s) would KCE participate?**

KCE objects to this interrogatory to the extent it seeks information that is beyond the scope of a petition to declaratory ruling as provided for under PUESA. Subject to the foregoing objection, KCE states that the project will be participating in the ISO-NE Forward Capacity Auction (“FCA”) 18 for capacity supply obligations (“CSOs”) for June 2027-June 2028. The project will continue to participate in subsequent FCAs. During the first year of the project (i.e., 2026), the project will participate in other available markets, such as the wholesale energy market and frequency regulation, while also preparing to be fully operational to meet CSOs starting in 2027.

20. **Would KCE participate in any other ISO-NE markets (ex. ancillary services)?**

KCE objects to this interrogatory to the extent it seeks information that is beyond the scope of a petition to declaratory ruling as provided for under PUESA. Subject to the foregoing objection, KCE states that the project will seek to participate in all applicable energy markets to maximize the project’s benefits, while taking care to balance the best opportunities with the available BESS resources and necessary commitments required by any market segment.

21. **How is the proposed facility consistent with the objectives of the state Conservation & Load Management Plan?**

Similar to the ESS program, the Conservation and Load Management Plan (“C&LM Plan”) is an energy efficiency and demand management investment plan that develops programs and initiatives to help Connecticut residents and businesses become more energy efficient. The activities outlined in this plan are directly related to residential, commercial and industrial energy customers and users and focuses on behind the meter activities. The project or any stand-alone BESS which participates in wholesale energy markets cannot directly participate in this program. However, the noted project benefits described above address the same needs and goals of the C&LM Plan, which include shifting energy demand periods and servicing system load.

Proposed Facility and Associated Equipment

22. **Referencing Petition p. 4, provide the dimensions (e.g. length, width and height) of the control house.**

The currently proposed control house is approximately 10 feet long by 8 feet wide and 8.5 feet high. A copy of this spec sheet is attached hereto as **Exhibit B**, however, final design of the control house will not be completed until after an EPC contractor is hired. KCE is amenable to providing the Council with additional information regarding the design of the control house, assuming this Petition is granted.

23. **Referencing Petition Tab A – Sheet C-2.0, identify where within the compound the control house would be located.**

KCE currently intends to locate the control house at the southwestern corner of the project facility. Site Plan Sheet C 2.0 has been revised to depict this (attached hereto as **Exhibit C**).

24. **Referencing Petition Tab A – Sheet C-2.0, list the equipment that would be installed on each equipment pad.**

Site Plan Sheet C 2.0 (attached hereto as **Exhibit C**) has been revised to depict the equipment currently expected to be installed on each equipment pad.

Interconnection

25. **Referencing Petition p. 3, KCE notes that “The Project inverters will export energy at 23 kV, so there will be no need for an additional main step-up transformer or substation.” Referencing Petition Exhibit B, Inverter Specifications Sheet, the SG3150U inverter has a nominal output voltage of 630 Volts AC. Additionally, each ST2752UX battery storage unit each contain a 5,000 kVA, 0.9 kV to 34.5-kV step-up transformer. Explain how the 23-kV output is obtained from this proposed facility.**

Each of the inverter units SC3150U is ordered from SunGrow and includes a coupled inverter step up transformer. These inverter step up transformers can be ordered with a few different high side voltage ratings and winding configurations. For this project, the high side of the inverter step up transformer will be ordered at 23kV. If there was a reference that the voltage would be stepped up to 34.5kV, this was a scrivener’s error and should be ignored.

26. **Which equipment would step-down the 23-kV AC grid voltage and then convert it to DC to recharge the batteries? Explain.**

The SunGrow SC3150 inverters are ordered coupled with an inverter step up transformer, as one piece of integrated equipment. The step-up transformer will transform the voltage from 23kV to 630VAC. The inverter will change the voltage from AC on the transformer side to DC on the battery side. Please reference Exhibit B to the Petition.

27. **Referencing Petition p. 9, an auxiliary power transformer would be procured on or about November 28, 2025. What would the auxiliary power transformer be used for, and where would it be installed (e.g. the AUX pad)?**

The Auxiliary Power Transformer will be used to reduce the voltage from 23kV to 480 volts at the point of interconnect for use by the BESS mechanical and maintenance systems, which is largely comprised of the HVAC system. The project has proposed that the Auxiliary Power Transformer be a pad mount or pole mount transformer located in between the point of interconnection on Ella T. Grasso Turnpike and the project meter. However, the final location will be determined by Eversource after the completion of the interconnection studies and during the facilities study. In the event that Eversource prefers that the Auxiliary Power Transformer be located within the

project fence line, KCE has included space within the project plan labeled Equipment Pad – Aux to accommodate that location.

28. **Are there existing electrical distribution line(s) directly south of the host parcel and running east-west along the Route 20 corridor? Explain. Has KCE considered interconnecting to such existing distribution in lieu of a new interconnection route from the facility to Ella T. Grasso Turnpike? Explain.**

The transmission lines visible south of the project crossing Route 20 are part of the Eversource Transmission system, not the Eversource Distribution system. In early stages of project planning, KCE consulted with Eversource and was informed that those lines could not be used to host this type of project. Please refer to Eversource’s DG Hosting capacity map, which illustrates which distributed system lines are available for DG project interconnection at <https://eversource.maps.arcgis.com/apps/webappviewer/index.html?id=4a8523bc4d454ddaa5c1e3f9428d8d8f>.

29. **Referencing Petition p. 4, approximately three new poles would be installed along the access road. What is the height of the utility poles above ground level after installation? Is the number of poles due to the span (i.e. distance) and/or to support attached equipment? Could the number of poles be reduced?**

Typically, the height of the utility poles above ground level is approximately 39 feet, however, the height will be determined by Eversource in its discretion as part of the interconnection process. Eversource will likely match the height of the existing utility poles along the Ella T. Grasso Turnpike. The proposed configuration with 4 poles is typical for Eversource’s connection of a solar generation facility and is based on their design requirements for electrical service, however, Eversource may require a different number of poles for an energy storage facility.

30. **Is the existing electrical distribution on Ella T. Grasso Turnpike three-phase, or would it have to be upgraded from single-phase to three-phase?**

Google Earth and the Eversource DG Hosting Capacity Map shows that there is three phase distribution on Ella Grasso Turnpike. Please refer to: <https://eversource.maps.arcgis.com/apps/webappviewer/index.html?id=4a8523bc4d454ddaa5c1e3f9428d8d8f>.

31. **Is the facility interconnection required to be reviewed by ISO-NE?**

Yes, the Preliminary Distribution System Interconnection Study and Proposed Plan of Action is required to be reviewed by the ISO-NE/NEPOOL Reliability Committee (“RC”) for I.3.9 approval. The study was reviewed and approved by the RC on June 30th, 2023 (attached hereto as **Exhibit D**).

32. **Referencing Petition p. 4, subject to the final impact study and related design, would the facility be able to automatically disconnect from the grid in the event of a fault or other electrical disturbance? Explain.**

Once the project is operational, it will be continually monitored 24/7 by a remote operations control center (“ROCC”). The project will be equipped with Battery Management Software (“BMS”), which shall inform automated procedures and personnel through supervisory control and data acquisition (“SCADA”) systems. The BMS has the ability to disconnect the battery from the grid in case of a fault or abnormal performance indication.

Public Safety

33. Would the project comply with the current National Electrical Code (NEC) and the National Electrical Safety Code (NESC)? What codes and standards apply to battery storage facilities?

The Project will conform with all electrical codes as standards listed in the following table:

Applicable Code	Component Part Covered	Description
2021 International Fire Code (IFC)	Whole System	
2018 International Building Code (IBC) or 2021 pending release	Whole System	
National Fire Protection Association (NFPA) 855	Whole System	Standard for the Installation of Stationary Systems
UL 9540	Whole System	Requirements for installation, providing appropriate instruction manuals
NFPA70	Whole System	Benchmark for safe electrical design, installation, and inspection
NFPA70e	Whole System	Workplace injuries and fatalities due to shock, electrocution, arc flash, and arc blast, and assists in complying with OSHA
UL 9540A	Battery Rack + enclosure	Installation ventilation requirements; fire protection (integral or external); Fire service strategy
UL 1973	Battery Rack	Test ability to withstand fire from the outside and inside of BESS without cascading between modules
UL 1741	Inverter	Inverters capable of managing grid reliability functions

UL 1642	Battery Cell	Reduce the risk of fire or explosion and for the responder when dealing with damaged product
UL 2054	Battery Cell	Type of plastic, wall thickness, amount of non-UL qualified material used, etc.
IEC 62281	Battery Cell Transportation	Safe transport as hazardous material

34. **Referencing Petition p. 10, has KCE received the results of the Federal Aviation Administration (FAA) 7460 review for temporary crane use? If yes, please provide a copy.**

KCE received a Determination of No Hazard to Air Navigation for Temporary Structure from FAA on July 17, 2023. A copy of this determination is enclosed herewith as **Exhibit E**.

35. **Referencing Petition Tab B - ST2752UX specifications sheet, page 2, the battery units would have fused sprinkler heads for fire safety. Where will the connection for the water supply be located? Under what conditions might the sprinkler heads be activated, and how long would they continue to jettison water? In the event that such sprinkler heads are activated, would the ground surrounding the proposed facility be graded such that any sprinkler water flow would be directed away from the wetlands?**

The battery units do come with a dry sprinkler system. This equipment is activated when the responding fire department connects a tank truck to the system from outside of the container. However, emergency response guidance for this equipment has been evolving as advances in safety testing and practices are made. Current guidance instructs that the sprinkler system should not be used, and any fire event should be allowed to burn out in a controlled manner while nearby resources are monitored and protected using water as a proactive cooling agent on the exterior of the battery containers.

Caution should be exercised if water is applied directly to the exterior of an affected ESS enclosure, as this will not stop a thermal runaway event and may potentially delay eventual combustion of the entire ESS product. Defensive firefighting tactics are generally recommended, with water being applied to nearby exposures for cooling, as necessary. Any hoseline operations should be limited to hose and master stream application from outside of the construction perimeter as far back as hose and stream ranges allow. The decision to provide thermal cooling via hoselines should be made in coordination with the System Owner / Operator, local emergency responders, and any other required SMEs.

A fog pattern from a handline or monitor nozzle may potentially be utilized to control smoke and gases released from the affected enclosure and to prevent them from migrating to unwanted areas. The use of water as the primary agent removes the concerns with run off from fire chemical agents. Use of water on the exterior only prevents the contaminated runoff from any chemicals associated with the BESS and HVAC system.

In all instances, power shut down and isolation involving any high voltage feeder lines must be confirmed before any defensive measures are taken involving application of water to the site.

KCE will continue to coordinate with local emergency responders, including both the Town of Windsor Locks and Bradley Airport, to refine the emergency response plan, and to provide training to local responders prior to construction with the best available procedures and recommendations at that time.

36. What layers of protection will be included to prevent “Thermal Runaway?” For example, please respond to the following:

The first and most important line of defense for Thermal Runaway is the 24/7 ROCC monitoring using the BMS. The system is equipped to immediately suspend operations of any units that are not operating within the prescribed temperature and performance. As needed, isolated modules, individual containers or the full system can be shut down remotely. Each ESS enclosure is equipped with:

- Two (2) heat detectors per enclosure
- Two (2) smoke detectors per enclosure
- Two (2) combustible gas detectors

In the event of fire detection via smoke, heat, or gas detectors, the Fire Alarm Control Panel (“FACP”) shall send Alarm and Trouble signals to the Central Station which shall then be relayed to the local fire department dispatch station.

Emergency shutoff is provided at multiple levels, though the fire department should not engage with E-Stops, as ESS shutdown may adversely affect the electrical grid. Upon activation of a heat, smoke, or gas detector, all battery racks in the enclosure are disconnected from the ESS block. Auxiliary power (230 VAC and 24 VDC) shall remain connected to the BMS and exhaust ventilation system. Each Sungrow ST2752UX-US enclosure is equipped with a physical E-stop button, though this is intended for maintenance purposes only.

Training for local emergency responders will be provided with a full review of these systems and guidance for the appropriate approach, use and actions.

a) Would explosion vent panels be installed on the top of battery energy storage system?

Each ST2752UX-US unit is equipped with an exhaust ventilation system designed in accordance with NFPA 69 to remove flammable gases released during a potential battery failure from the enclosure before explosive limits can be reached. The system consists of two (2) 100 CFM fans (200 CFM total) per compartment and is triggered by the included gas detectors upon detection of 10% lower flammability limit (“LFL”) of the volume of the enclosure.

It is standard on Explosion Prevention Systems to remove flammable off-gases during thermal runaway and maintain levels below 25% of the LFL of the volume of the enclosure.

- b) Would a fast-acting gaseous agent system be installed to potentially put any Class C fire out before it can turn into a Class B fire that involves the battery cells?**

Fire suppression agents are not recommended for use with the systems. Comprehensive study and testing has proven that water is the best agent for controlling and preventing the spread of any fire event as indicated above.

- c) Would thermal imaging be employed?**

Thermal imaging is not used by the BMS.

- 37. Referencing Petition Tab B - ST2752UX specifications sheet, page 2, the 5,000 kVA transformers would have either mineral oil or “degradable oil upon request.” How much oil will each transformer hold, and will there be alarms (such as low-level oil alarms) that can alert monitors of a leak?**

There is 2130 kg (5092 lbs.) of FR3 oil per transformer. FR3 is a dielectric heat transfer fluid made from 100% vegetable oil for use in electrical transformers and other electrical equipment. FR3 provides improved fire safety over mineral oils. FR3 is readily biodegradable with over 99% biodegradation occurring within just 28 days. FR3 is non-hazardous and non-toxic in soil and water. The FR3 filled medium voltage transformers are equipped with port sensors that include a low oil level trip and alarm when oil drops below the minimum level required, which would alert the operations team to potential issues and to perform a visual inspection.

Under normal operating conditions, there should not be any release to the environment. However, in the case of an accidental release to the environment, the appropriate spill response measures will be taken as per the site specific SPCC plan to ensure that any FR3 oil that escapes is appropriately mitigated in accordance with said plan. These measures will help to mitigate the potential for the FR3 oil from entering any catch basins wetlands, or streams in the area. Any FR3 that infiltrates soils onsite is biodegradable, non-hazardous, non-toxic and will be cleaned up in accordance with the site specific SPCC plan. Any FR3 on impervious surfaces will be properly cleaned up in accordance with the site specific SPCC plan. All soiled absorbent materials and collected FR3 will be disposed of in accordance with all State and Federal regulations and the site specific SPCC Plan.

- 38. Referencing Petition Tab G – Acoustic Analysis, will the system generate noise during charging of the facility, discharge of the facility, neutral conditions (i.e. neither charging nor discharging), or all three? Was the modeling performed for the worst-case scenario, and does such scenario also take into account any fans for the cooling system? Explain.**

The sound level modeling represents the worst-case scenario for the project which would involve all 12 battery container systems operating at full load with the liquid-cooling system also running

at full capacity. The PCS was modeled under reduced noise operation. “Reduced noise operation” data was provided by the manufacturer and can be achieved by reducing PCS power and cooling fan operations. This lowers sound levels by approximately 8 dBA, and this represents worst-case conditions and was used in the sound level analysis for this project. The project will at all times be operated within the parameters of this sound modeling.

39. How would first responders access the site? Would a secondary access point be necessary for first responders?

Emergency access to the site will be via the project access road on the Ella T. Grasso Turnpike. A secondary access point for first responders is not necessary.

40. Are there municipal fire hydrants located in the immediate vicinity of the proposed site for response tie-in in the event of a fire?

As previously noted, current industry guidance recommends employing a defensive position in case of any fire. Proper use of resources in this approach reduces the need for large quantities of water. The two nearest fire hydrants are located at: (1) the driveway of 8 Ella T. Grasso Turnpike, approximately 260 feet from the Ella T. Grasso Turnpike and 600 feet from the proposed project site; and (2) 5 Ella T. Grasso Turnpike, located on the edge of the Ella T. Grasso Turnpike and approximately 1000 feet from the proposed project location.

41. What type of media and/or specialized equipment would be necessary to extinguish a battery storage/electrical component fire? Specifically, based on any history of fires at installed battery systems, is there specialized firefighting equipment necessary to extinguish a Lithium-ion battery fire? Is there a concern with runoff and cleanup caused by fire extinguishment?

Please refer to the answers provided in response to question 36. The use of water as the primary agent removes the concerns with run off from fire chemical agents. Use of water on the exterior only prevents the contaminated runoff from any chemicals associated with the BESS and HVAC system.

42. Referencing Petition Exhibit J – Operations and Maintenance Plan, will KCE provide training to the local first responders in proper firefighting protocols for Lithium-ion battery fires?

Yes, KCE has already initiated discussions with the local fire department, provided an overview of current best practices, and provided copies of the preliminary Emergency Operations Plan for their comment. KCE will continue to work with the local fire department and emergency responders to refine this plan prior to construction. Per Section 1, 5. Preparation and Planning, KCE will provide training to local fire departments and emergency responders for all scenario response protocols.

43. What are the industry Best Management Practices for Electric and Magnetic Fields at battery storage facilities?

Please refer to the answers provided in response to question 44, as EMF is expected to be minimal at the site. Moreover, due to the current lack of evidence that this is a significant issue, as demonstrated by results from studies performed by the World Health Organization, there are no industry Best Management Practices for EMF.

44. **What is the dominant source of EMF? Would the facility, including its interconnection, be expected to materially affect AC (i.e. 60 Hz) magnetic field levels at the host parcel boundaries? Explain.**

BESS EMF emissions are expected to be similar to those of transmission substations with respect to 60-Hz magnetic fields, whereas the sources inside the facility are not generally substantial sources of 60-Hz magnetic fields outside the facility. The transmission and distribution lines entering and exiting the facility are the dominant sources of EMF at the property line and beyond. In the case of this project, the generation tie line that is connecting the project to the point of interconnect on the Ella T. Grasso Turnpike has the same 23kV rating as the existing roadside line and will not create any greater level of EMF than already exists at this location or across most areas of the state.

45. **Please describe how the proposed facility would comply with the Council's White Paper on the Security of Siting Energy Facilities, available at: https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/Docket_346/whitepprFINAL20091009114810pdf.pdf**

BESS project security is very similar to methods employed for transmission substations and include the use of a locked security fence and recording security cameras. The project will comply with the State compliance regulations as described under "Compliance" on page 4 of the White Paper on the Security of Siting Energy Facilities.

Environmental Effects and Mitigation Measures

46. **What is the distance from the limit of disturbance to the nearest wetland boundary?**

The nearest project disturbance to a delineated wetland boundary is the south westernmost fence post corner, which is approximately 73 feet away from the delineated wetland edge.

47. **Are there any wells on the site or in the vicinity of the site? If so, how would KCE protect the wells and/or water quality from potential construction and operational impacts?**

There are no known wells on the site or in the vicinity of the site. A review of the Connecticut Department of Public Health ("DPH") Connecticut's Drinking Water Public Map Viewer indicates that the site itself and all adjacent properties are likely served by public water companies. A copy of an excerpt of this map centered on the site is enclosed herewith as **Exhibit F**. Notwithstanding the absence of private wells, the project intends to meet all State stormwater quality goals in its design, no new impervious areas are proposed, and an erosion control plan and sequence has been prepared for construction activities.

48. **Referencing Petition p. 8, KCE notes that the project would require minimal tree clearing. Tab A, Sheet C-2.0 of the Petition notes that no tree clearing is proposed. Would any trees six inches in diameter or greater be removed to accommodate the installation of the proposed facility? If yes, how many?**

It is not anticipated that any trees six inches in diameter or greater would be removed as part of this project. If any clearing and grubbing is required, it would be limited to low-lying brush vegetation.

49. **Referencing pages 6-7 of the Petition, provide a copy of the vernal pool survey, if available.**

Vernal pool surveys were conducted by biologists from Flycatcher on April 4, 2023. Definitions from Calhoun et al. (2005) and the USACE Connecticut General Permit (2021) as well as the presence of indicator species were used to make vernal pool determinations. Biologists from Flycatcher conducted surveys within the entire host parcel, and specifically investigated the potential vernal pool (PVP MFT_1) as shown on Figure 2 in Exhibit D to the Petition. No vernal pool indicator species were observed during this investigation. No formal vernal pool survey report was prepared.

50. **Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:**

A photo exhibit and accompanying map of photo locations has been prepared and is attached hereto as **Exhibit G**.

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. **wetlands, watercourses and vernal pools;**
2. **forest/forest edge areas;**
3. **agricultural soil areas;**
4. **sloping terrain;**
5. **proposed stormwater control features;**
6. **nearest residences;**
7. **Site access and interior access road(s);**
8. **utility pads/electrical interconnection(s);**

9. **clearing limits/property lines;**
10. **mitigation areas; and**
11. **any other noteworthy features relative to the Project.**

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

51. **Provide a photo-simulation of the proposed facility.**

A photo simulation depicting the proposed project facility has been prepared and is attached hereto as **Exhibit H**.

52. **Where is the nearest publicly-accessible recreational area from the proposed site? Describe the visibility of the proposed project from this recreational area, if any.**

The nearest publicly-accessible recreational area is the Rainbow Reservoir Boat Launch, located approximately 1.5 miles west of the project. The project would not be visible from this area.

53. **Referencing Petition p. 8, has KCE received a response from the State Historic Preservation Office regarding the Phase 1A review? Why was a study area of 1 mile used for the review?**

The Phase IA report was submitted to the SHPO on June 13, 2023. The project received comments from SHPO on July 26, 2023. In a letter, attached hereto as **Exhibit I**, SHPO concurs with the opinion of Heritage that no historic properties will be affected by the proposed project and no additional archeological investigations are warranted. A one-mile study area was used around the project because that is industry standard and was also requested by SHPO.

54. **Where is the nearest national, state and/or locally-designated scenic road or area from the proposed site? Describe the visibility of the proposed facility from these areas, if any.**

The nearest scenic road is South Main Street (CT 75), located approximately 3.9 miles north in Suffield, Connecticut. The proposed project would not be visible from this road.

Facility Construction

55. **Referencing Petition p. 9, facility construction would occur within an area of less than one acre. Estimate the total disturbance area in square feet.**

The amount of land disturbance required to construct this project is anticipated to be extremely minimal due to the fact that the facility is proposed atop an existing gravel pad. The only land disturbance anticipated for this project includes the installation of equipment pads, fence posts, utility poles, and the clearing of minor brush if necessary. It is anticipated that approximately 6,500 square feet of disturbance will take place.

56. **Would the proposed concrete pads be poured on site or delivered to the site? Explain.**

The EPC contractor selected to oversee the construction of the project will choose the best method for establishing concrete pads and foundations based on the project's engineered design. Any work performed on site will follow best general practices for containment and cleanup of any construction materials and methods.

57. **Quantify the amounts of cut and fill that would be required to develop the proposed facility. If there is excess cut, will this material be removed from the site or deposited on the site?**

The amount of overall earthwork required to construct the facility is anticipated to be extremely minimal due to the fact that the facility is proposed atop an existing gravel pad. The only cut/fill required to develop the facility includes minor excavation for concrete pad installation, fence post installation, utility pole installation, and conduit trenching between the equipment pads. It is currently anticipated that interconnection to Ella Grasso Turnpike will be via overhead wires atop new utility poles. It is anticipated that approximately 350 cubic yards of earth movement is required to construct the project and that any excess material would be hauled off-site, however, KCE respectfully requests the right to potentially move excess material to another acceptable location on site once an EPC is brought on board, at which point KCE would notify the Council of this request and location.

58. **Referencing Petition Exhibit E – Geotechnical Report, would any blasting be required to develop the site? Has KCE determined the final design and construction methods for site development (e.g. foundations, subgrade preparation, etc.)?**

No blasting is required for the proposed project. The geotechnical report provides that material at the site is largely sand with no likelihood of shallow bedrock. The final design for construction methods will be determined by final engineering after hiring an EPC, so the final designs and construction methods have yet to be fully determined.

59. **Provide the estimated typical construction hours and days of the week (e.g. Monday through Friday 8 AM to 5 PM)?**

As noted on Exhibit A to the Petition, Sheet C 4.0, #9, construction times are anticipated to be 7:00 AM - 5:00 PM Monday through Friday. If any variation from this schedule is temporarily required, the project will request permission to do so from the Council.

Exhibit A

(Revised Figure 4)

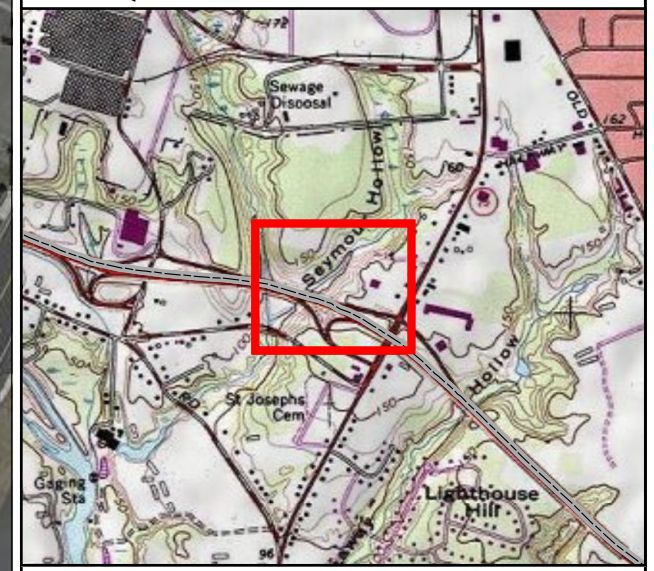
Coordinate System: NAD 1983 StatePlane Connecticut FIPS 0600 Feet (Foot US)
Map Rotation: 0

Plot Date: 8/1/2023 1:12:52 PM by DREWKENWORTHY -- LAYOUT: ANSI B(11"x17")
Path: C:\FLYCATCHER\Projects\KeyCapture\KCE_WindsorLocksCT9_Petition_Fig4_PropCon_11x17L.mxd



LEGEND

- HOST PARCEL
- INTERCONNECTION EASEMENT
- UPLAND DRAINAGE
- DELINEATED INTERMITTENT STREAM
- DELINEATED STREAM BANK
- DELINEATED WETLAND BOUNDARY
- DELINEATED WETLAND
- DELINEATED PERENNIAL STREAM/RIVER
- SECURITY FENCE
- BATTERY STORAGE CONTAINER
- EDGE OF PAVEMENT
- SWITCHGEAR
- EQUIPMENT PAD - PCS
- EQUIPMENT PAD - AUX
- PROPOSED INTERCONNECTION ROUTE
- EQUIPMENT PAD - OTHER



NOTES:

1 BASEMAP IMAGERY FROM ESRI/NAIP "WORLD IMAGERY" SERVICE LAYER.

0 150 300
Feet
1" = 150'
1:1,800

PROJECT: **KEY CAPTURE ENERGY
CT 9 BATTERY STORAGE PROJECT
WINDSOR LOCKS, HARTFORD COUNTY, CT**

TITLE: **PROPOSED CONDITIONS**

DRAWN BY: D. KENWORTHY	PROJ NO.: 22-F3
CHECKED BY: K. NICKERSON	FIGURE 4
MONTH: JULY	
YEAR: 2023	

FILE NO.: KCE_WindsorLocksCT9_Petition_Fig4_PropCon_11x17L.mxd	

Exhibit B

(Control House Spec Sheet)

SG3150U New

Turnkey Station for North America 1500 Vdc System



High Yield

- Advanced three-level technology, max. efficiency 98.8%, CEC efficiency 98.5 %
- Max. DC/AC ratio more than 1.5



Easy O&M

- Integrated current and voltage monitoring function for online analysis and fast trouble shooting
- Modular design, easy for maintenance
- Convenient external LCD



Saved Investment

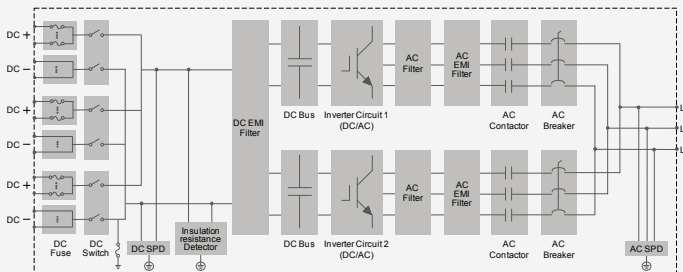
- Low transportation and installation cost due to 10-foot container design
- 1500V DC system, low system cost
- Integrated LV auxiliary power supply



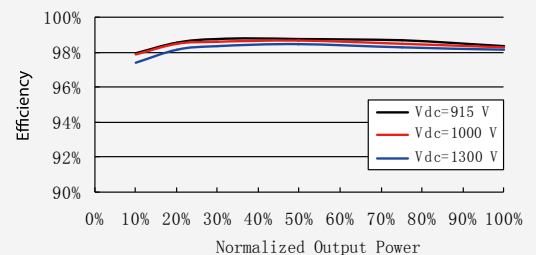
Grid Support

- Complies with UL 1741, UL 1741 SA, IEEE 1547, Rule 21 and NEC 2014/2017
- Grid support including L/HVRT, L/HVRT, power ramp rate control, active and reactive power support

Circuit Diagram



Efficiency Curve



Input (DC)**SG3150U**

Max. PV input voltage	1500V
Min. PV input voltage / Startup input voltage	915 V / 955 V
MPP voltage range	915 – 1300 V
No. of independent MPP inputs	1
No. of DC inputs	18 – 24
Max. PV input current	3420 A
Max. DC short-circuit current	4800 A

Output (AC)

AC output power	3150 kVA @ 45 °C (113 °F)
Max. AC output current	2886 A
Nominal AC voltage	630 V
AC voltage range	554 - 690 V
Nominal grid frequency / Grid frequency range	60 Hz / 55 – 65 Hz
THD	< 3 % (at nominal power)
DC current injection	< 0.5 % of nominal output current
Power factor at nominal power / Adjustable power factor	> 0.99 / 0.8 leading – 0.8 lagging
Feed-in phases / Connection phases	3 / 3

Efficiency

Max. efficiency / CEC efficiency	98.8 % / 98.5 %
----------------------------------	-----------------

Protection

DC input protection	Load break switch + fuse
AC output protection	Circuit breaker
Overvoltage protection	DC Type II / AC Type II
Grid monitoring / Ground fault monitoring	Yes / Yes
Insulation monitoring	Optional
Night SVG function	Optional
Overheat protection	Yes

General Data

Dimensions (W*H*D)	2991*2591*2438 mm (117.8"*102.0"*96.0")
Weight	6.9 T (15211.9 lbs)
Isolation method	Transformerless
Degree of protection	NEMA 3R
Auxiliary power supply	120 Vac, 5 kVA / Optional: 480 Vac, 30 kVA
Operating ambient temperature range	-30 to 60 °C (> 45 °C derating) (-22 to 140 °F (> 113 °F derating))
Allowable relative humidity range (non-condensing)	0 – 95 %
Cooling method	Temperature controlled forced air cooling
Max. operating altitude	4000 m (> 2000 m derating) (13123 ft (> 6561 ft derating))
Display	Touch screen
Communication	Standard: RS485, Ethernet; Optional: optical fiber
Compliance	UL 1741, IEEE 1547, UL1741 SA, NEC 2014/2017, CSA C22.2 No.107.1-01
Grid support	L/HVRT, L/HFRT , active & reactive power control and power ramp rate control, Volt-var, Frequency-watt



Exhibit C

(Revised Site Plan)

Site Plans

Issued for	Application
Date Issued	June 2, 2023
Latest Issue	August 8, 2023

BESS Installation CT9

2 Ella Grasso Turnpike
Windsor Locks, Connecticut



Applicant

Key Capture Energy
25 Monroe Street
Albany, NY 12210

Map / Block / Lot:

038 / 001 / 002

Owner

Barberino John S
10311 Boca Woods Lane
Boca Raton, FL 33428

Sheet Index

No.	Drawing Title	Latest Issue
C-1.0	Legend, Abbreviations and General Notes	August 8, 2023
C-2.0	Layout & Materials Plan	August 8, 2023
C-3.0	Grading & Drainage Plan	August 8, 2023
C-4.0	Erosion and Sediment Control Plan	August 8, 2023
C-5.0	Site Details	August 8, 2023

Reference Drawings

No.	Drawing Title	Latest Issue
1 of 1	ALTA/NSPS Land Title Survey	July 18, 2022



100 Great Meadow Road Suite 200 Wethersfield, CT 06109 860.807.4300

Legend

Legend table with columns: Exist., Prop., and descriptions for various site features like Property Line, Pavement, Fences, and Landmarks.

Abbreviations

Abbreviations table with columns: General and descriptions for terms like ABAN (ABANDON), ACR (ACCESSIBLE CURB RAMP), and various utility symbols.

Notes

Notes table with columns: General and Erosion Control, containing numbered instructions for construction and site management.

BESS Installation CT9 2 Ella Grasso Turnpike Windsor Locks, Connecticut

Revision table with columns: No., Revision, Date, and Appr. for tracking changes to the drawing.

Approval table with columns: Designed by (AMK), Checked by (SJK), Issued for, and Date.

Application June 2, 2023

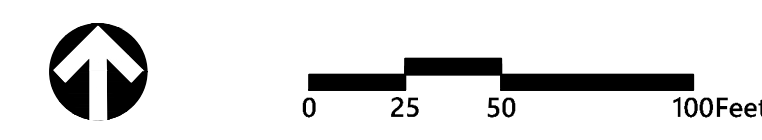
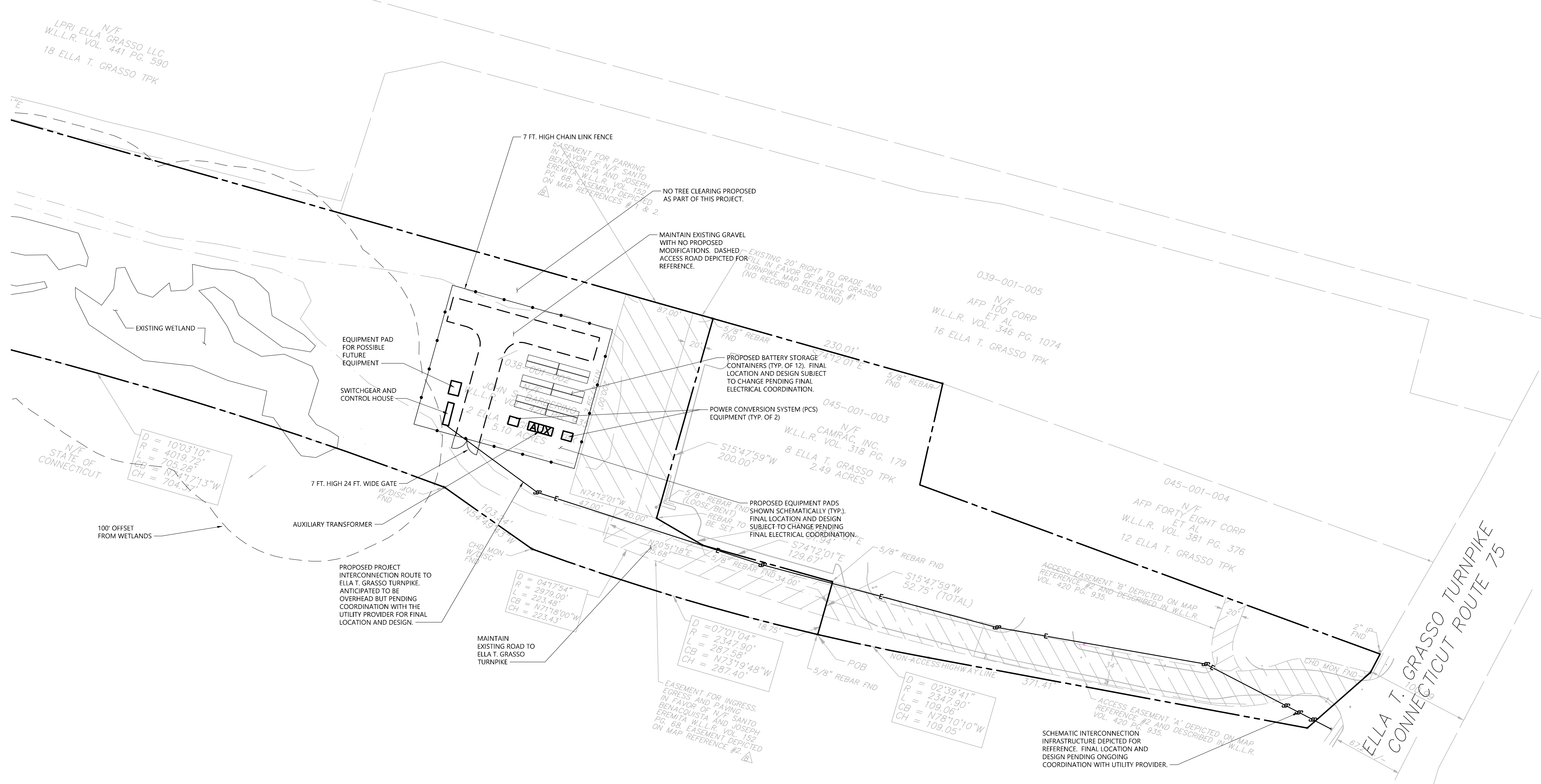
Not Approved for Construction

Legend, Abbreviations and General Notes title block with drawing title and sheet information.

Drawing Number

C-1.0

Sheet 1 of 5



BESS Installation CT9

2 Ella Grasso Turnpike
Windsor Locks, Connecticut

No.	Revision	Date	Appr'd.
1	CSC Set 1 Interrogatories	8/8/2023	SJK

Designed by: **AMK** Checked by: **SJK**

Issued for: **Application** Date: **June 2, 2023**

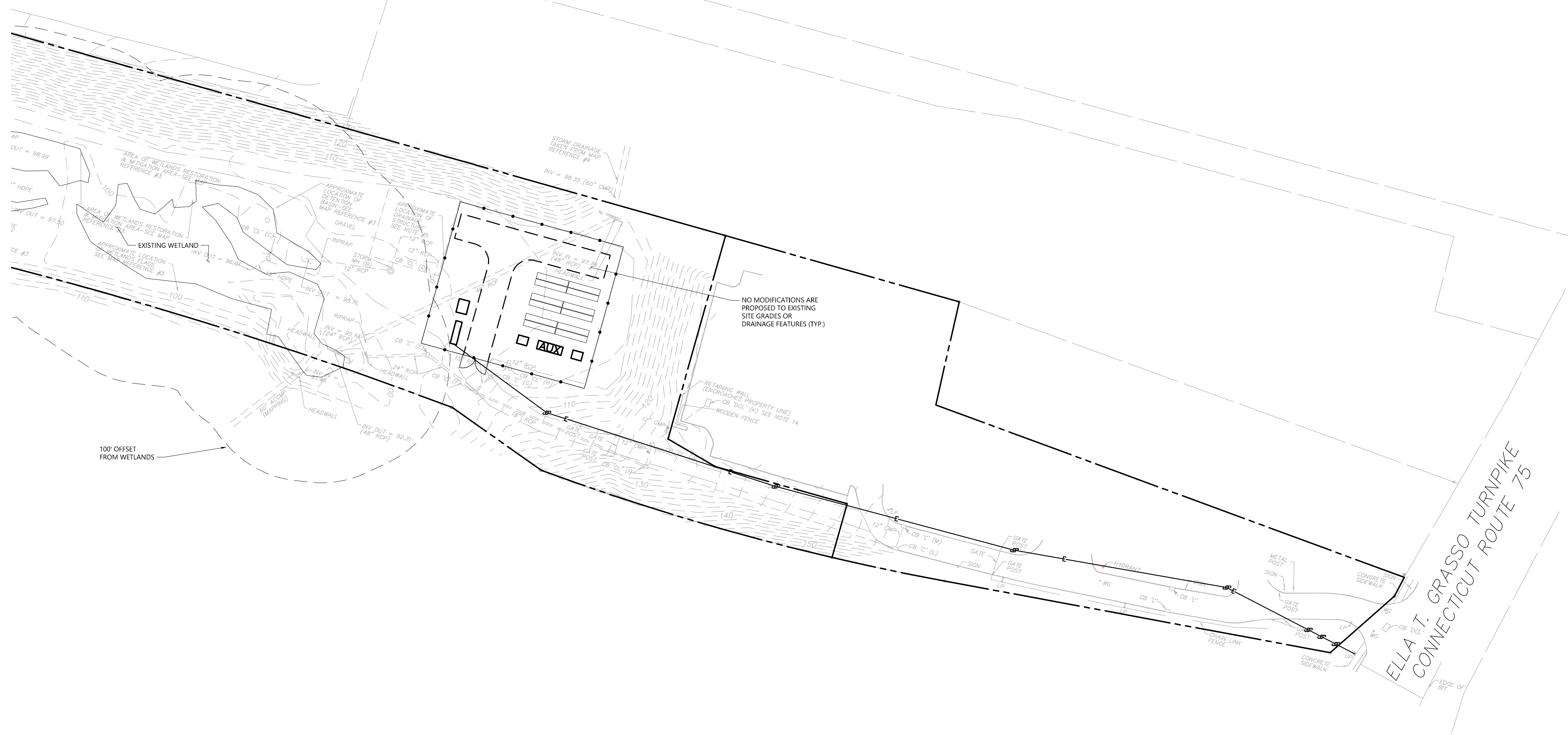
Not Approved for Construction
Drawing Title: **Layout & Materials Plan**

Drawing Number

C-2.0

Sheet 2 of 5

Project Number: 43175.00



BESS Installation CT9

2 Ella Grasso Turnpike
Windsor Locks, Connecticut

No.	Revision	Date	App'd.
1	CSC Set 1 Interrogatories	8/8/2023	SJK

Designed by	Checked by
AMK	SJK
Issued for	Date
Application	June 2, 2023

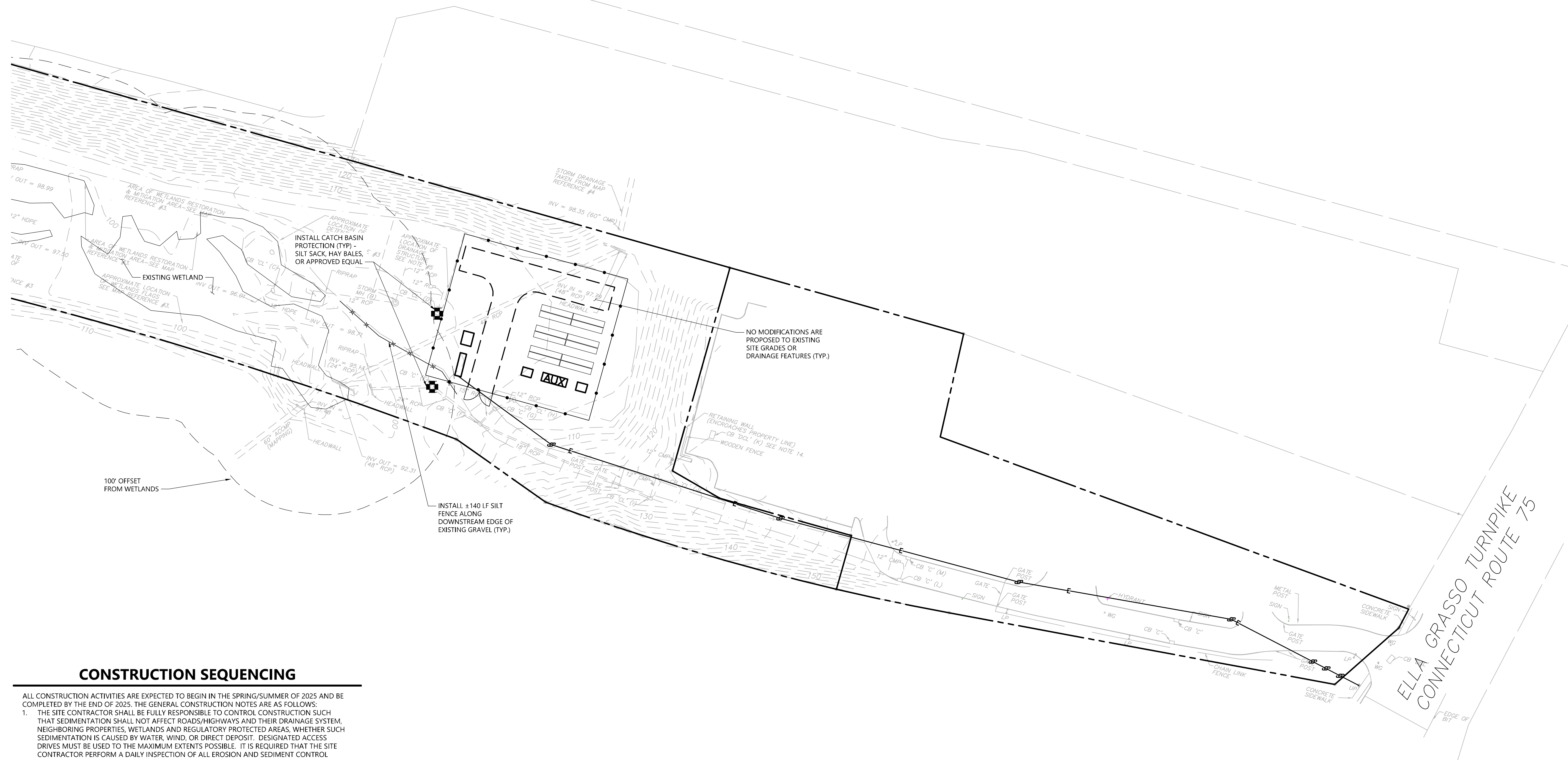
Not Approved for Construction
Drawing Title
Grading & Drainage Plan

Drawing Number

C-3.0

Sheet 3 of 5

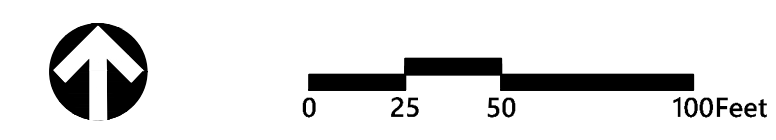
Project Number
43175.00



CONSTRUCTION SEQUENCING

- ALL CONSTRUCTION ACTIVITIES ARE EXPECTED TO BEGIN IN THE SPRING/SUMMER OF 2025 AND BE COMPLETED BY THE END OF 2025. THE GENERAL CONSTRUCTION NOTES ARE AS FOLLOWS:
1. THE SITE CONTRACTOR SHALL BE FULLY RESPONSIBLE TO CONTROL CONSTRUCTION SUCH THAT SEDIMENTATION SHALL NOT AFFECT ROADS/HIGHWAYS AND THEIR DRAINAGE SYSTEM, NEIGHBORING PROPERTIES, WETLANDS AND REGULATORY PROTECTED AREAS, WHETHER SUCH SEDIMENTATION IS CAUSED BY WATER, WIND, OR DIRECT DEPOSIT. DESIGNATED ACCESS DRIVES MUST BE USED TO THE MAXIMUM EXTENTS POSSIBLE. IT IS REQUIRED THAT THE SITE CONTRACTOR PERFORM A DAILY INSPECTION OF ALL EROSION AND SEDIMENT CONTROL MEASURES EMPLOYED AT THE SITE.
 2. THROUGHOUT THE COURSE OF THE CONSTRUCTION PROJECT, ADDITIONAL SEDIMENT AND EROSION CONTROL MEASURES MAY BE WARRANTED AT THE DISCRETION OF THE OWNER AND/OR DESIGN ENGINEER. THESE IMPROVEMENTS MUST BE IMPLEMENTED IN A TIMELY FASHION IN ACCORDANCE WITH THE REQUIREMENTS OF THE CONSTRUCTION GENERAL PERMIT.
 3. PRIOR TO CONSTRUCTION, THE APPLICANT SHALL PROVIDE THE TOWN OF WINDSOR LOCKS WITH THE NAME OF CONTACT AND 24-HOUR CONTACT INFORMATION.
 4. CONTRACTOR SHALL ADHERE TO 2002 CONNECTICUT GUIDELINES FOR EROSION AND SEDIMENT CONTROL, AS AMENDED.
 5. THE CONTRACTOR SHALL HOLD PRE-CONSTRUCTION MEETING(S). ATTENDEES SHALL INCLUDE, BUT NOT BE LIMITED TO, REPRESENTATIVES OF THE GENERAL CONTRACTOR, SITE CONTRACTOR, TOWN OF WINDSOR LOCKS, AND ENGINEER OF RECORD.
 6. THE CONTRACTOR SHALL CONTACT CALL-BEFORE-YOU-DIG (1-800-922-4455) PRIOR TO ENGAGING IN ANY EXCAVATION ACTIVITIES AT THE SITE.
 7. THE CONTRACTOR SHALL NOTIFY THE TOWN OF WINDSOR LOCKS AGENT, ZONING ENFORCEMENT OFFICER, AND ENGINEERING DEPARTMENT, 48 HOURS PRIOR TO COMMENCEMENT OF ANY CONSTRUCTION ACTIVITY.
 8. NO CONSTRUCTION OF SITE IMPROVEMENTS MAY BEGIN UNTIL THE PROPER EROSION CONTROL MEASURES SERVING THE AREA TO BE DISTURBED ARE IN PLACE.
 9. ANTICIPATED WORK HOURS WILL BE BETWEEN 7:00 AM AND 5:00 PM MONDAY THROUGH FRIDAY. IF ANY VARIATION FROM THIS SCHEDULE IS TEMPORARILY REQUIRED, THE PROJECT TEAM SHALL PROVIDE NOTICE TO CONNECTICUT SITING COUNCIL.

- CONSTRUCTION SEQUENCE (SPRING/SUMMER 2025)**
1. INSTALL EROSION AND SEDIMENT CONTROLS FOLLOWING THE CT GUIDELINES AND MANUFACTURER'S DIRECTIONS. DURING CONSTRUCTION, THE CONTRACTOR SHALL INSTALL MEASURES AS REQUIRED BY THE ENGINEER OF RECORD OR OWNER, TO PREVENT SEDIMENT-LADEN RUNOFF FROM REACHING WETLANDS OR DISCHARGING OFFSITE.
 2. INSTALL ELECTRICAL COMPONENTS AND INTERCONNECTION.
 3. INSTALL SITE FENCING.
 4. RESEED, REPAVE, AND/OR REPLANT ANY AREAS DISTURBED BY CONSTRUCTION.



BESS Installation CT9 2 Ella Grasso Turnpike Windsor Locks, Connecticut

No.	Revision	Date	App'd.
1	CSC Set 1 Interrogatories	8/8/2023	SJK

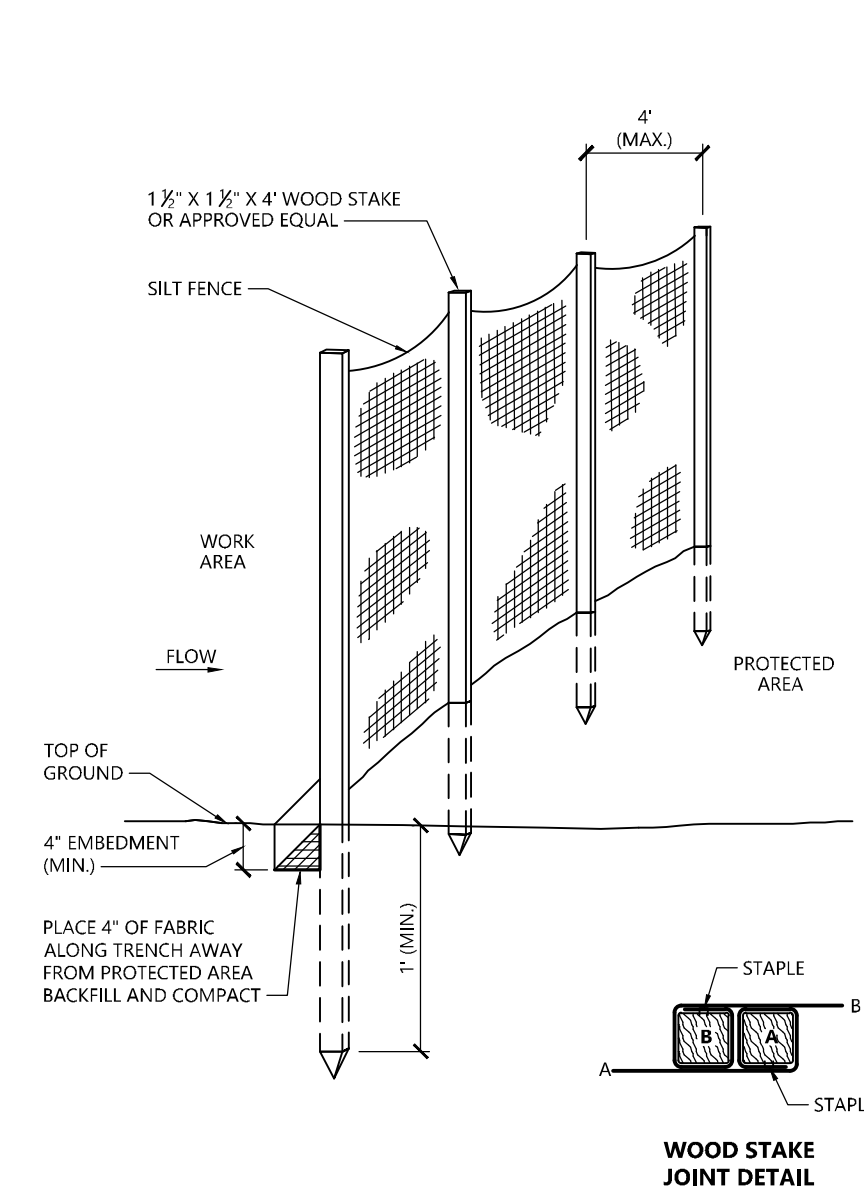
Designed by	Checked by
AMK	SJK
Issued for	Date
Application	June 2, 2023

Not Approved for Construction

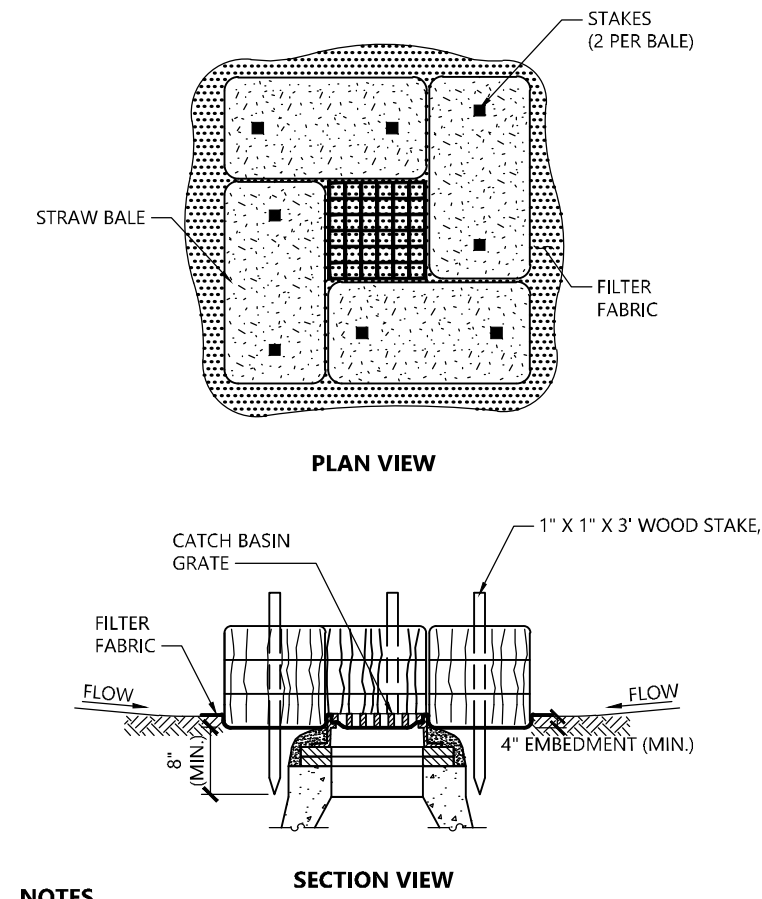
Erosion and Sediment Control Plan

C-4.0

Sheet 4 of 5



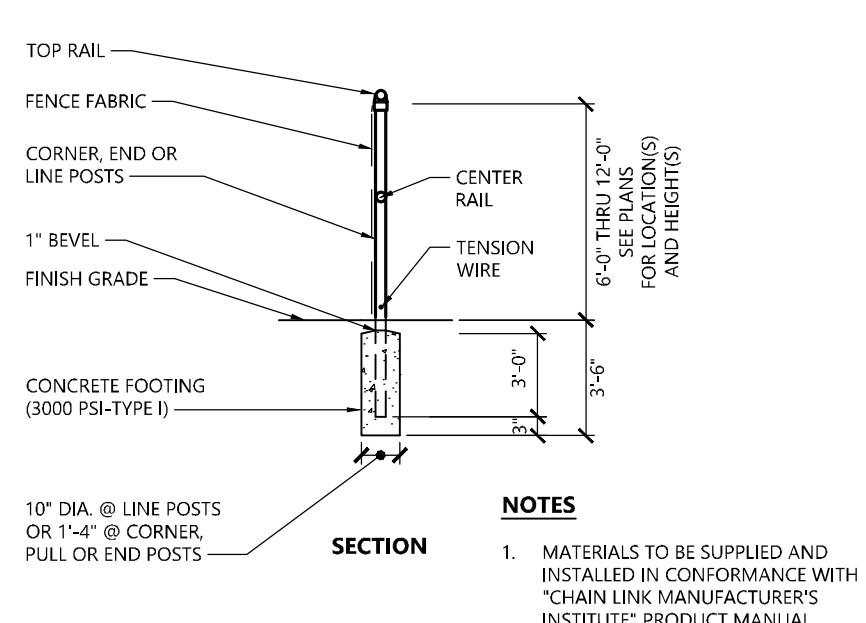
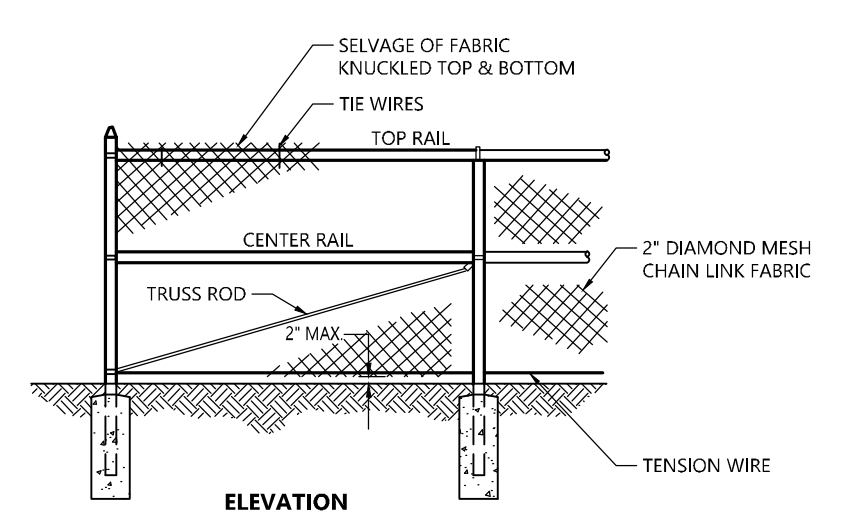
Silt Fence Barrier 1/16
N.T.S. Source: VHB LD_650



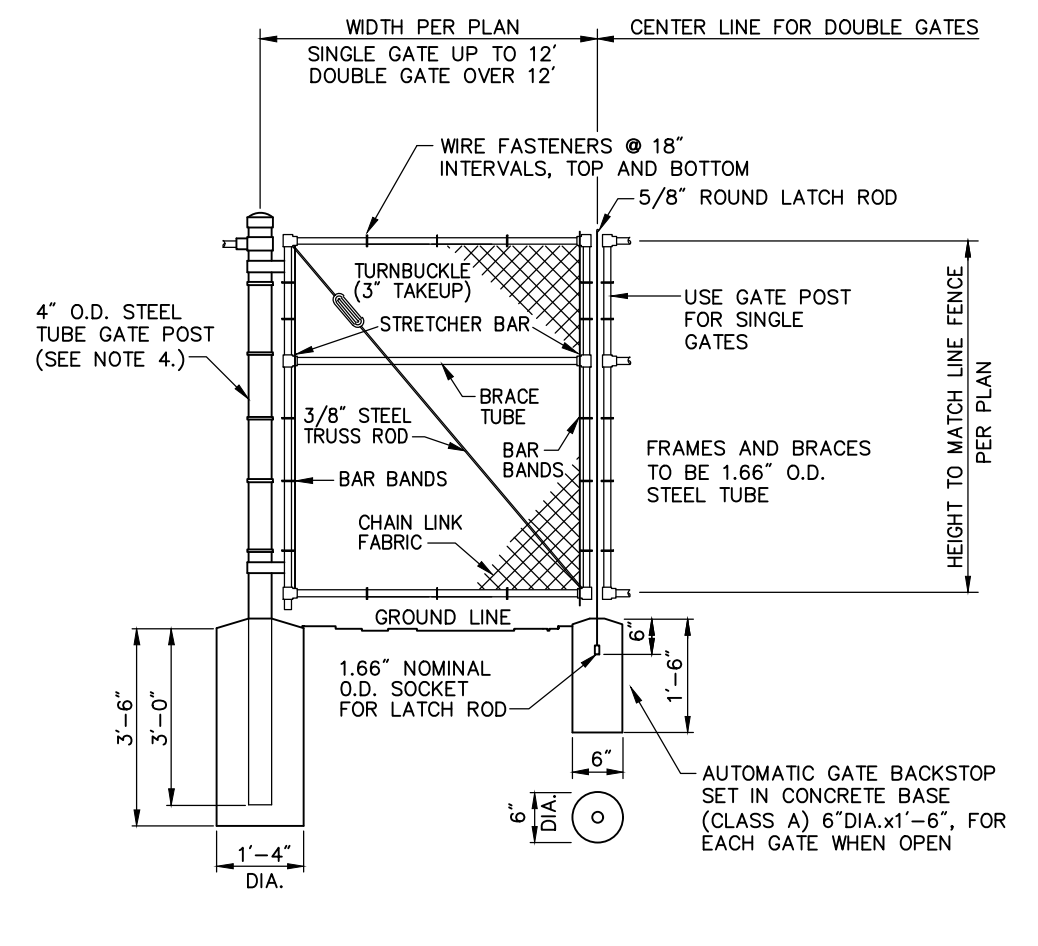
NOTES

1. ENCLOSE STRUCTURE WITH HAYBALES IMMEDIATELY AFTER CATCH BASIN CONSTRUCTION. MAINTAIN UNTIL PAVING BINDER COURSE IS COMPLETE OR A PERMANENT STAND OF GRASS HAS BEEN ESTABLISHED.
2. IF GRATE IS AGAINST EXISTING CURBS THEN BALES ARE TO BE PLACED AROUND THREE SIDES OF GRATE ONLY.
3. GRATE TO BE PLACED OVER FILTER FABRIC.
4. BALES SHALL BE INSPECTED PERIODICALLY AND AFTER ALL STORM EVENTS AND REPAIR OR REPLACEMENT SHALL BE PERFORMED PROMPTLY AS NEEDED.

Catch Basin Sediment Trap 1/16
N.T.S. Source: VHB LD_673



6' to 12' Chain Link Fence 10/20
N.T.S. Source: VHB LD_480



Notes:

1. CHAIN LINK FABRIC FOR GATES TO BE THE SAME AS REQUIRED FOR FENCE.
2. GATE POST BASE—PORTLAND CEMENT CONCRETE (3000 PSI).
3. FENCE FABRIC, POSTS, FRAMEWORKS, AND HARDWARE SHALL BE GALVANIZED STEEL OR BLACK WYHL (AS INDICATED ON PLANS) PER SPECIFICATIONS.
4. GATE POSTS TO BE USED ON EACH SIDE OF SINGLE AND DOUBLE GATE OPENINGS.

Chain Link Fence Gate 6/08
N.T.S. Source: VHB LD_482



PHOTOVOLTAIC INSTALLATION
Site Location: 2 Ella Grasso Turnpike, Windsor Locks, CT
Owner: Key Capture Energy

IN CASE OF EMERGENCY CALL 911
WINDSOR LOCKS POLICE DEPARTMENT - (860) 627-1461

Notes:

1. THE SITE FACILITY SIGN IS A DRAFT SHOWING THE MINIMUM AMOUNT OF INFORMATION THAT WILL BE PROVIDED. SIGN WILL BE 18" X 24".
2. ALL SIGNS WILL BE MOUNTED ONTO THE CHAIN LINK FENCE.

Danger and Site Facility Signs 1/16
N.T.S. Source: VHB

BESS Installation CT9
2 Ella Grasso Turnpike
Windsor Locks, Connecticut

No.	Revision	Date	Appvd.
1	CSC Set 1 Interrogatories	8/8/2023	SJK

Designed by	Checked by
AMK	SJK
Issued for	Date
Application	June 2, 2023

Not Approved for Construction
Drawing Title
Site Details

Drawing Number

C-5.0

Sheet of
5 5

Project Number
43175.00

MAP REFERENCES:

- 1. LAYOUT PLAN SITE PLAN PREPARED FOR JOHN BARBARINO 2 ELLA GRASSO TURNPIKE RTE 75 WINDSOR LOCKS, CONNECTICUT. SCALE: 1" = 40'. DATE: 10/04/12. LAST REVISED: 2/2/13. DESIGN: LAND SURVEYING & CONSULTING, LLC. W.L.L.R. MAP NUMBER 1659.

NOTES:

- 1. BEARINGS, COORDINATES AND ELEVATIONS DEPICTED HEREON ARE BASED UPON THE NORTH AMERICAN DATUM OF 1983 (NAD 83) AND THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD 88) AND WERE OBTAINED VIA GNSS OBSERVATIONS PROCESSED THROUGH THE SUPERIOR INSTRUMENT RTK GNSS NETWORK.

PROPERTY DESCRIPTION (SURVEY):

A CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWN OF WINDSOR LOCKS, COUNTY OF HARTFORD AND STATE OF CONNECTICUT, AND IS MORE PARTICULARLY BOUNDED AND DESCRIBED AS FOLLOWS: BEGINNING AT A POINT IN THE NORTHERLY LINE OF LAND OF THE STATE OF CONNECTICUT, KNOWN AS CONNECTICUT ROUTE 20, ALSO KNOWN AS BRADLEY FIELD CONNECTOR, SAID POINT IS LOCATED AT A DISTANCE OF 480.47' WESTERLY ALONG THE NORTHERLY LINE OF LAND OF THE STATE OF CONNECTICUT, KNOWN AS CONNECTICUT ROUTE 20, ALSO KNOWN AS BRADLEY FIELD CONNECTOR FROM THE WESTERLY STREETLINE OF ELLA T. GRASSO TURNPIKE, THENCE;

ALONG A CURVE TO THE RIGHT WITH AN ARC LENGTH OF 287.58 FEET AND A RADIUS OF 2347.90 FEET TO A POINT, THENCE; N54°49'43" W A DISTANCE OF 103.24 FEET TO A POINT, THENCE; ALONG A CURVE TO THE LEFT WITH AN ARC LENGTH OF 705.28 FEET AND A RADIUS OF 4019.72 FEET, THE LAST THREE COURSES ALONG LAND NOW OR FORMERLY THE STATE OF CONNECTICUT, TO A POINT, THENCE;

ALTA NOTES:

- 3. SUBJECT PARCEL IS LOCATED IN ZONE X (AREAS DETERMINED TO BE OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN) AS DEPICTED UPON FIRM FLOOD INSURANCE RATE MAP HARTFORD COUNTY, CONNECTICUT (ALL JURISDICTIONS) PANEL 216 OF 675, MAP NUMBER 09003C0216F EFFECTIVE DATE: SEPTEMBER 26, 2008.

PROPERTY DESCRIPTION (RECORD):

A CERTAIN PIECE OR PARCEL OF LAND, TOGETHER WITH ALL OF THE BUILDINGS AND IMPROVEMENTS THEREON, SITUATED OFF THE WESTERLY SIDE OF TURNPIKE ROAD, ALSO KNOWN AS ELLA T. GRASSO TURNPIKE, IN THE TOWN OF WINDSOR LOCKS, COUNTY OF HARTFORD AND STATE OF CONNECTICUT, TO THE REAR OF PROPERTY KNOWN, AS NO. 8 TURNPIKE ROAD, AND BEING SHOWN AS PARCEL B 5.10 ACRES (INCLUDING 0.40 +/- ACRE EASEMENT FOR FUTURE PARKING) ON A MAP OR PLAN ENTITLED: "PREPARED FOR SANTO BENAQUISTA AND ANTONIO SABATINI 8 TURNPIKE ROAD WINDSOR LOCKS, CONN. ALFORD ASSOCIATES CIVIL ENGINEERS WINDSOR, CONNECTICUT WILSON M. ALFORD, SR. P.E. & L.S. WILSON M. ALFORD, JR. P.E. & L.S. ALFORD ASSOCIATES, INC. DATE: JAN. 3, 1985 SCALE: 1" = 40 FT. DATE REVISION 1/4/85 ADD. NOTE #15 1/10/85 ADD. EASEMENT 'C', WHICH SAID MAP OR PLAN IS ON FILE IN THE OFFICE OF THE TOWN CLERK SAID TOWN OF WINDSOR LOCKS, TO WHICH REFERENCE IS HEREBY MADE, SAID PREMISES ARE MORE PARTICULARLY BOUNDED AND DESCRIBED AS FOLLOWS:

COMMENCING AT AN IRON PIN SET IN THE NORTHERLY LINE OF LAND OF THE STATE OF CONNECTICUT KNOWN AS CONNECTICUT ROUTE 20 AND ALSO KNOWN AS THE BRADLEY FIELD CONNECTOR, WHICH IRON PIN IS 480.46 FEET WESTERLY, AS MEASURED IN THE NORTHERLY LINE OF SAID CONNECTICUT ROUTE 20 OR BRADLEY FIELD CONNECTOR, FROM A MONUMENT SET IN THE WESTERLY STREET LINE OF TURNPIKE ROAD ALSO KNOWN AS ELLA T. GRASSO TURNPIKE, AND WHICH IRON PIN MARKS THE SOUTHEASTERLY CORNER OF THE WITHIN DESCRIBED PREMISES;

THENCE N 15° 48' 10" E, ALONG PARCEL A, AS SHOWN ON SAID MAP, A DISTANCE OF 52.75 FEET TO A POINT; THENCE N 74° 11' 50" W, CONTINUING ALONG PARCEL A AS SHOWN ON SAID MAP, A DISTANCE OF 129.67 FEET TO A POINT; THENCE N 59° 52' 50" W, CONTINUING ALONG SAID PARCEL A AS SHOWN ON SAID MAP, A DISTANCE OF 51.94 FEET TO A POINT; THENCE N 15° 48' 10" E, CONTINUING ALONG SAID PARCEL A, AS SHOWN ON SAID MAP, A DISTANCE OF 200.00 FEET TO A POINT IN LINE OF LAND NOW OR FORMERLY OF RICHARD A. & PAULINE MINER;

TOGETHER WITH A PERMANENT EASEMENT TO THE GRANTEE HEREIN AND ITS SUCCESSORS AND ASSIGNS FOREVER FOR VEHICULAR AND PEDESTRIAN TRAFFIC OVER A PORTION OF PARCEL A AS SHOWN ON SAID MAP AND SHOWN AND DESIGNATED AS "ACCESS EASEMENT 'A'" AND "ACCESS EASEMENT 'B'" ON THE AFORESAID MAP AND MORE PARTICULARLY DESCRIBED BY THE FOLLOWING COURSES AND DISTANCES: ACCESS EASEMENT "A": STARTING AT AN ANGLE POINT IN THE WEST HIGHWAY LINE OF TURNPIKE ROAD ALSO KNOWN AS ELLA T. GRASSO TURNPIKE, SAID POINT BEING LOCATED 20.03 FEET SOUTH, AS MEASURED IN SAID HIGHWAY LINE, FROM THE SOUTHEAST CORNER OF PROPERTY NOW OR FORMERLY OF HENRY D. VANDERBILT AND THE NORTHEAST CORNER OF PARCEL A, THENCE S48°38'50"W, IN THE WEST STREET LINE OF SAID TURNPIKE ROAD, ALSO KNOWN AS ELLA T. GRASSO TURNPIKE, 49.87 FEET TO A POINT; THENCE ALONG A CURVE TO THE LEFT, 39.92 FEET TO A POINT, SAID CURVE HAVING A RADIUS OF 30.00 FEET AND A CENTRAL ANGLE OF 76° 14' 40"; THENCE ALONG A CURVE TO THE RIGHT 82.18 FEET TO A POINT, SAID CURVE HAVING A RADIUS OF 155.00 FEET AND A CENTRAL ANGLE OF 30° 22' 45"; THENCE ALONG A CURVE TO THE RIGHT 383.77 FEET TO A POINT, SAID CURVE HAVING A RADIUS OF 2979.00 FEET AND A CENTRAL ANGLE OF 7° 22' 50"; THE THREE PRECEDING COURSES BEING THROUGH PARCEL A; THENCE N 15° 48' 10" E, ALONG PARCEL B, 34.00 FEET TO A POINT, THENCE ALONG A CURVE TO THE LEFT, 39.92 FEET TO A POINT, SAID CURVE HAVING A RADIUS OF 30.00 FEET AND A CENTRAL ANGLE OF 76° 14' 40"; THENCE ALONG A CURVE TO THE RIGHT 82.18 FEET TO A POINT, SAID CURVE HAVING A RADIUS OF 155.00 FEET AND A CENTRAL ANGLE OF 30° 22' 45"; THENCE ALONG A CURVE TO THE RIGHT 383.77 FEET TO A POINT, SAID CURVE HAVING A RADIUS OF 2979.00 FEET AND A CENTRAL ANGLE OF 7° 22' 50"; THE THREE PRECEDING COURSES BEING THROUGH PARCEL A; CONTAINING 17,750 SQUARE FEET.

ACCESS EASEMENT "B": STARTING AT A POINT ON THE NORTH LINE OF PARCEL A, SAID POINT BEING 138.00 FEET WESTERLY FROM THE WEST STREET LINE OF TURNPIKE ROAD, THENCE 20° 12' 00" W, 30.33 FEET TO A POINT, THENCE ALONG A CURVE TO THE LEFT, 37.99 FEET TO A POINT, SAID CURVE HAVING A RADIUS OF 35.00 FEET AND A CENTRAL ANGLE OF 62° 11' 15"; THE TWO PRECEDING COURSES BEING THROUGH PARCEL A, THENCE ALONG A CURVE TO THE RIGHT 24.40 FEET, THROUGH PARCEL A AND ALSO ALONG ACCESS EASEMENT "A", TO A POINT, SAID CURVE HAVING A RADIUS OF 121.00 FEET AND A CENTRAL ANGLE OF 11° 35' 45"; THENCE ALONG A CURVE TO THE RIGHT, 42.00 FEET TO A POINT, SAID CURVE HAVING A RADIUS OF 55.00 FEET AND A CENTRAL ANGLE OF 43° 44' 55"; THENCE N20°12'00"E, 30.33 FEET TO A POINT; THE TWO PRECEDING COURSES BEING THROUGH PARCEL A; THENCE S 89° 48' 00" E, IN THE NORTH LINE OF PARCEL A, 20.00 FEET TO THE POINT OF BEGINNING; CONTAINING 1410 SQUARE FEET.

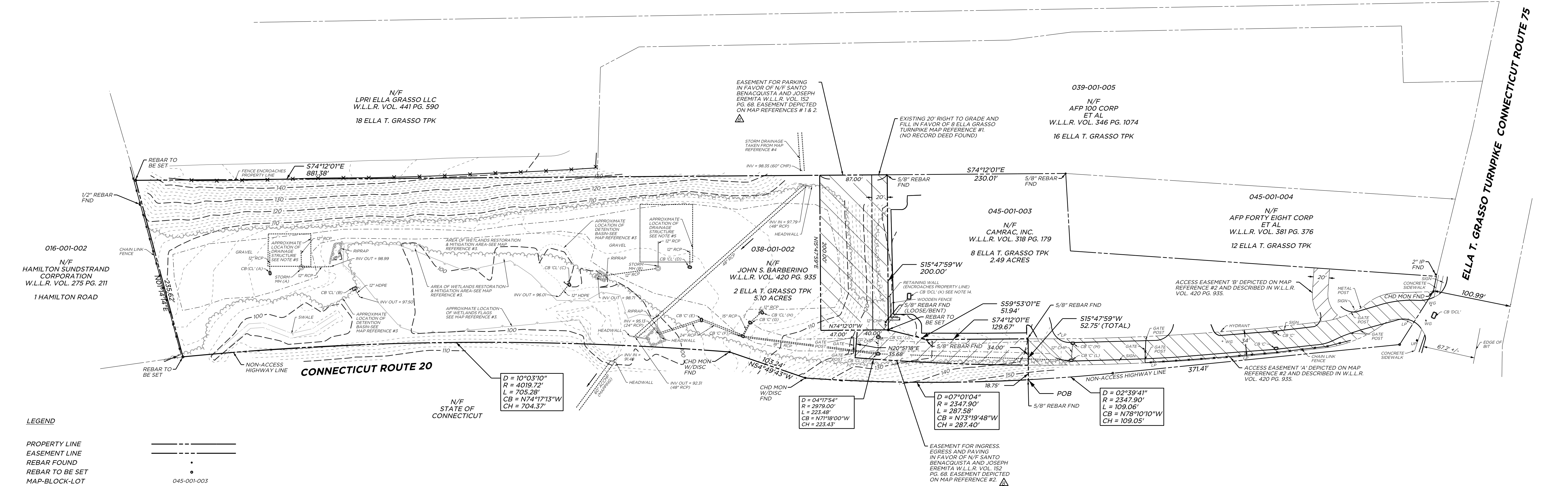
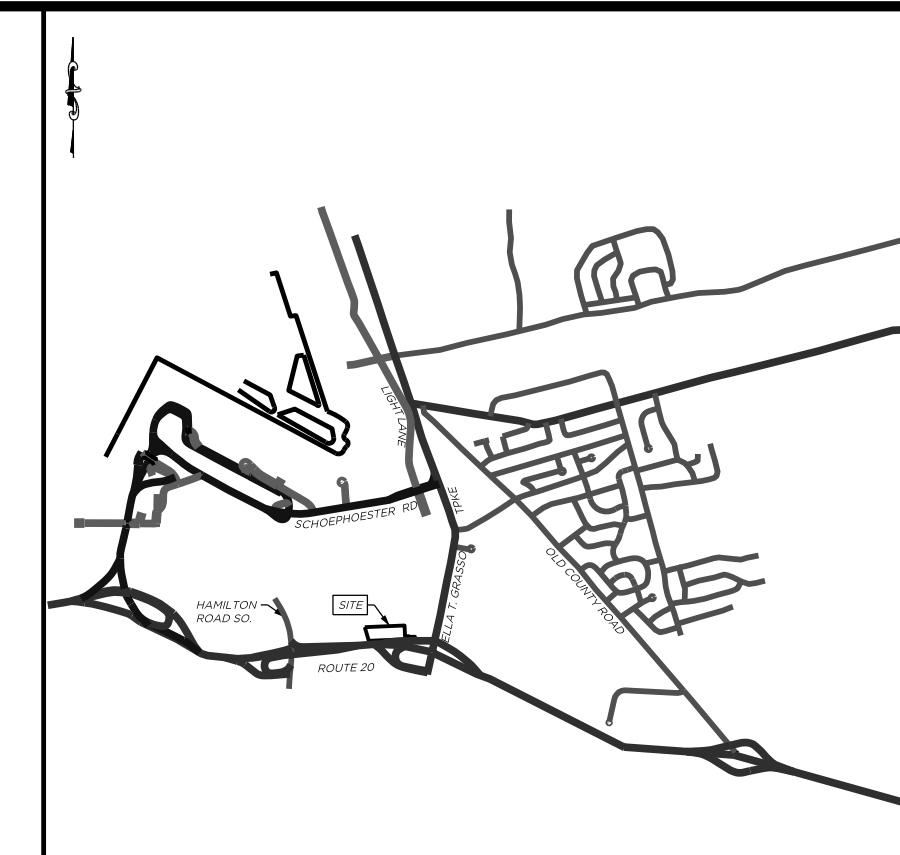
SAID EASEMENTS ARE CONVEYED TOGETHER WITH AND SUBJECT TO THE TERMS AND CONDITIONS SET FORTH IN A DEED FROM CLIFFORD L. OSTERLING TO ANTONIO SABATINI, SANTO BENAQUISTA AND JOSEPH A. EREMITA DATED FEBRUARY 5, 1985 AND RECORDED AT VOLUME 152 AT PAGE 68 OF THE WINDSOR LOCKS LAND RECORDS.

TITLE EXCEPTIONS:

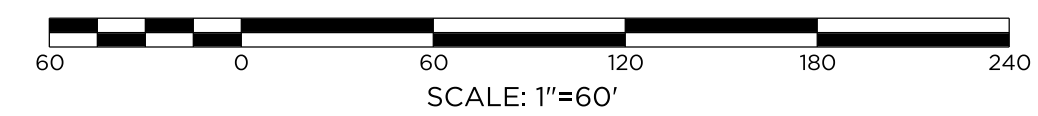
- NOTED, CONDITIONS AND MATTERS AS MAY APPEAR ON A MAP ENTITLED, "PREPARED FOR SANTO BENAQUISTA AND ANTONIO SABATINI 8 TURNPIKE ROAD WINDSOR LOCKS, CONN. ALFORD ASSOCIATES CIVIL ENGINEERS WINDSOR, CONNECTICUT WILSON M. ALFORD, SR. P.E. & L.S. WILSON M. ALFORD, JR. P.E. & L.S. ALFORD ASSOCIATES, INC. DATE: JAN. 3, 1985 SCALE: 1" = 40 FT. DATE REVISION 1/4/85 ADD. NOTE #15 1/10/85 ADD. EASEMENT 'C', WHICH MAP OR PLAN IS ON FILE IN THE WINDSOR LOCKS TOWN CLERK'S OFFICE. (NOT PLOTTABLE).

SCHEDULE OF INVERTS

Table with columns: STRUCTURE NUMBER, TOP OF FRAME, INVERT ELEVATION, PIPE DESCRIPTION, DIRECTION. Lists various structures like CB CL A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z, STORM MH A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z.



LEGEND table defining symbols for PROPERTY LINE, EASEMENT LINE, REBAR FOUND, REBAR TO BE SET, MAP-BLOCK-LOT, WINDSOR LOCKS LAND RECORDS, RIPRAP, TREELINE, GRAVEL, SWALE, CATCH BASIN, LIGHTPOLE, DOUBLE CATCH BASIN CL, MINOR CONTOUR, MAJOR CONTOUR, CHAIN LINK FENCE, WETLANDS LINE, UTILITY POLE, WATER GATE.



THIS IS TO CERTIFY THAT THIS MAP AND THE SURVEY ON WHICH IT IS BASED WERE MADE IN ACCORDANCE WITH THE 2021 MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/NSPS LAND TITLE SURVEYS JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND NSPS AND INCLUDES ITEMS 1, 2, 3, 4, 5, 7(a), 8, 10, 16, 17, 18 & 20 OF TABLE A THEREOF. THE FIELD WORK WAS COMPLETED JUNE & OCTOBER 2022.

Barton & Loguidice logo and contact information. Project details: ALTA/NSPS LAND TITLE SURVEY, PREPARED FOR KEY CAPTURE ENERGY, LLC, KCE CT9 WINDSOR LOCKS, 2 ELLA T. GRASSO TPKE, WINDSOR LOCKS, CT. Project number: 4428-001-005, Date: 7/18/22, Sheet: 1 of 1.

Exhibit D

(ISO-NE Reliability Committee Approval)



Alan McBride
Director, Transmission Services & Resource
Qualification

June 30, 2023

Mr. Oluwaseyi Olatujoye
Eversource Energy
56 Prospect Street
Hartford, CT 06103

Subject: Key Capture Energy LLC, Ella T. Grasso Turnpike Battery – Proposed Plan Application (PPA) – ES-23-G43

Dear Mr. Olatujoye,

This letter is to inform you that, pursuant to review under Section I.3.9 of the ISO Tariff, no significant adverse effect has been identified with regard to the following PPA:

ES-23-G43 – Generator application from Eversource Energy (ES) on behalf of Key Capture Energy LLC for the 5.02 MW/20.0 MWh Battery facility in Windsor, CT and interconnecting to the Windsor Locks Substation via the 14K7 circuit. The projected in-service date is July 27, 2025. The Reliability Committee (RC) reviewed the materials presented in support of the proposed project and did not identify a significant adverse effect on the reliability or operating characteristics of its transmission facilities, the transmission facilities of another Transmission Owner or the system of any other Market Participant.

Having given due consideration to the RC review, ISO New England has determined that implementation of the plan will not have a significant adverse effect upon the reliability or operating characteristics of the Transmission Owner's transmission facilities, the transmission facilities of another Transmission Owner, or the system of a Market Participant. A determination under Section I.3.9 of the ISO Tariff is limited to a review of the reliability impacts of a proposed project as submitted by Participants and does not constitute an approval of a proposed project under any other provisions of the ISO Tariff.

Sincerely,

/s/ Al McBride

Alan McBride
Director, Transmission Services & Resource Qualification

cc: Proposed Plan Applications

Exhibit E

(FAA Determination)



Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2023-ANE-3132-OE

Issued Date: 07/17/2023

Paul Williamson
Key Capture Energy
25 Monroe Street
Suite 300
Albany, NY 12210

****DETERMINATION OF NO HAZARD TO AIR NAVIGATION FOR TEMPORARY STRUCTURE****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Mobile Crane Temporary Crane
Location:	Windsor Locks, CT
Latitude:	41-55-05.00N NAD 83
Longitude:	72-40-36.00W
Heights:	105 feet site elevation (SE) 100 feet above ground level (AGL) 205 feet above mean sea level (AMSL)

This aeronautical study revealed that the temporary structure does not exceed obstruction standards and would not be a hazard to air navigation provided the condition(s), if any, in this letter is (are) met:

****SEE ATTACHMENT FOR ADDITIONAL CONDITION(S) OR INFORMATION****

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, will void this determination. Any future construction or alteration, including increase to heights, power or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of a structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination did not include an evaluation of the permanent structure associated with the use of this temporary structure. If the permanent structure will exceed Title 14 of the Code of Federal Regulations, part 77.9, a separate aeronautical study and FAA determination is required.

This determination concerns the effect of this temporary structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this determination will be forwarded to the Federal Aviation Administration Flight Procedures Office if the structure is subject to the issuance of a Notice To Air Missions (NOTAM).

If you have any questions, please contact our office at (404) 305-6430, or kelly.r.nelson@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2023-ANE-3132-OE

Signature Control No: 588661287-593569519

(TMP)

Kelly Nelson
Specialist

Additional Condition(s) or Information for ASN 2023-ANE-3132-OE

Proposal: To construct and/or operate a(n) Mobile Crane to a height of 100 feet above ground level, 205 feet above mean sea level.

Location: The structure will be located 1.3 nautical miles south of BDL Airport reference point.

Part 77 Obstruction Standard(s) Exceeded and Aeronautical Impacts, if any:

Aeronautical study revealed that the temporary structure will not exceed any Part 77 obstruction standard. Aeronautical study confirmed that the temporary structure will have no effect on any existing or proposed arrival, departure or en route instrument/visual flight rules (IFR/VFR) operations or procedures. Additionally, aeronautical study confirmed that the temporary structure will have no physical or electromagnetic effect on the operation of air navigation and communications facilities and will not impact any airspace and routes used by the military. Based on this aeronautical study, the FAA finds that the temporary structure will have no adverse effect on air navigation and will not impact any aeronautical operations or procedures.

Based on this aeronautical study, the structure would not constitute a substantial adverse effect on aeronautical operations or procedures because it will be temporary. The temporary structure would not be considered a hazard to air navigation provided all of the conditions specified in this determination are strictly met.

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 M.

It is required that the manager of BRADLEY INTL, (860) 292-2030 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site.

It is required that the manager of BRADLEY INTL ATCT, 860-386-3500 be notified at least 3 business days prior to the temporary structure being erected and again when the structure is removed from the site. Additionally, please provide contact information for the onsite operator in the event that Air Traffic Control requires the temporary structure to be lowered immediately.

This determination expires on 01/17/2025 unless extended, revised, or terminated by the issuing office.

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed within 5 days after the temporary structure is dismantled.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

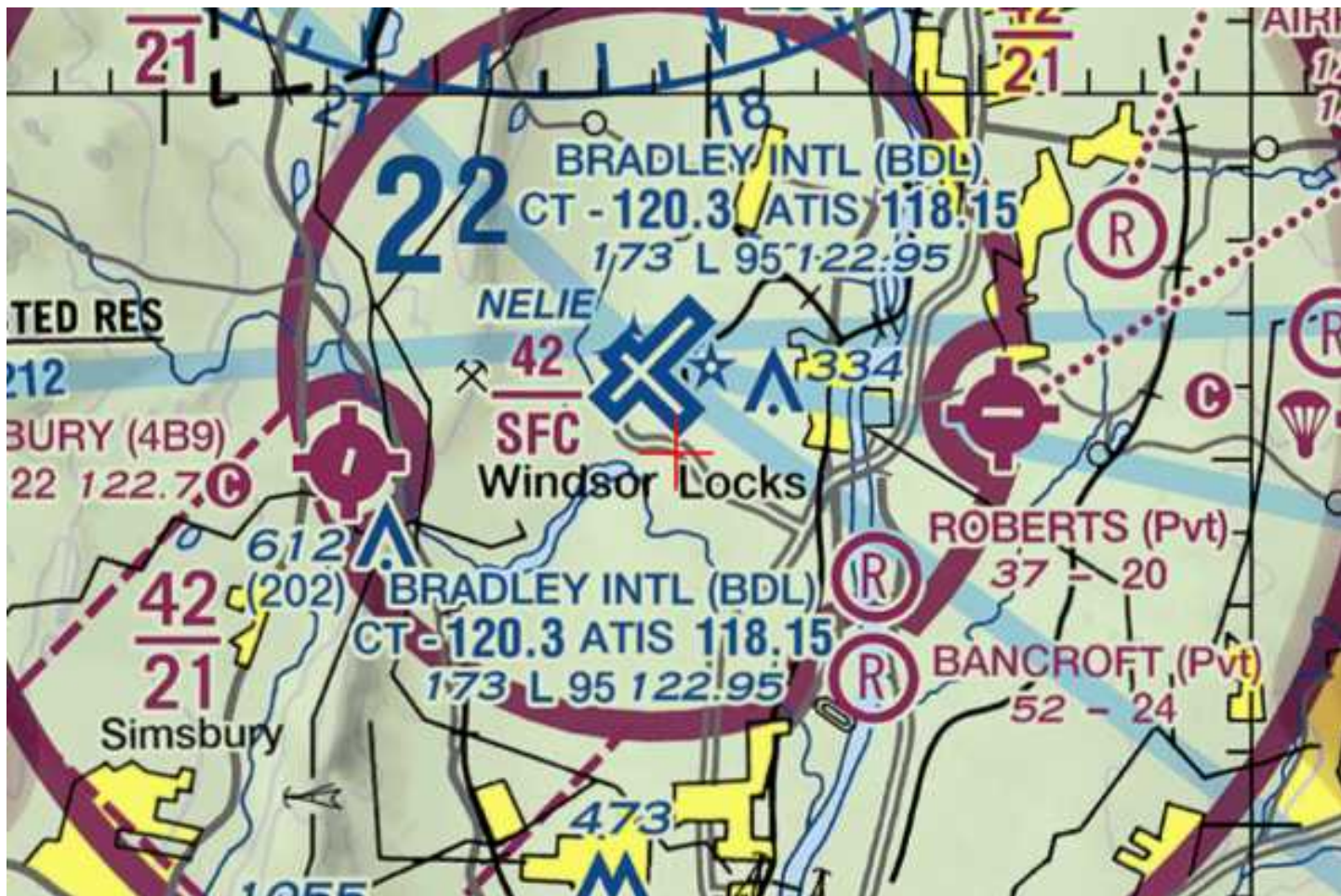


Exhibit F

(DPH Drinking Water Map)

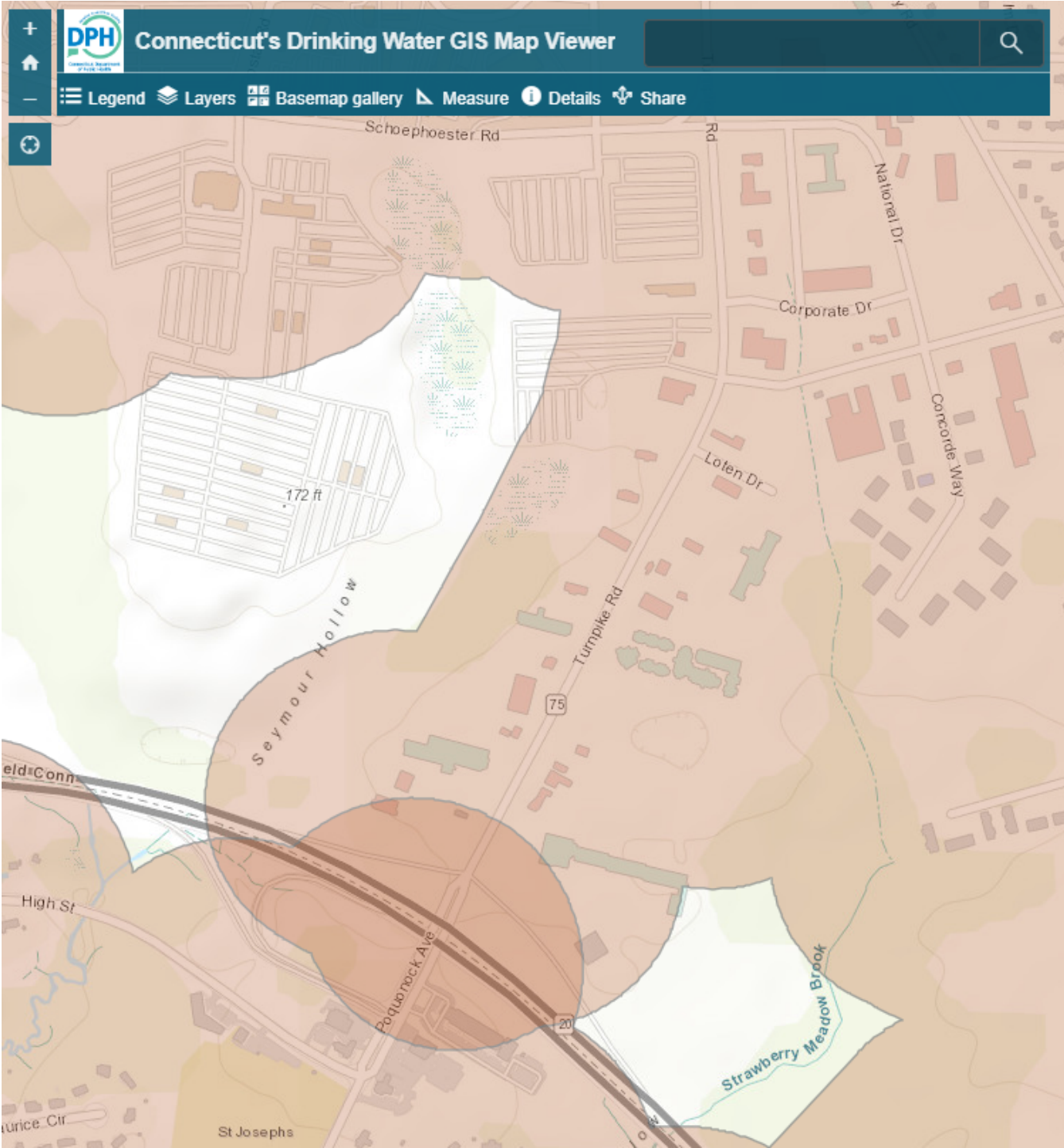


Exhibit G

(Photo Exhibits)

Photo Exhibit Map

KCE BESS Windsor Locks | Windsor Locks, CT



- | | | | |
|---------------------------|-----------------------------------|-----------------------------|---------------------------------|
| — Host Parcel | — Existing Drainage Structure | □ Proposed Battery Unit | ● Existing Interconnection Pole |
| — Access Parcel | — Existing Subsurface Drainage | ■ Field-Delineated Wetlands | ➔ Photo Locations |
| — Proposed Security Fence | — Schematic Interconnection Route | ■ Proposed Equipment Pad | |
| — Proposed Security Gate | | ▨ Easement Area | |
- Source: CTDEEP, VHB

Path: \\vhb.com\gis\proj\Wethersfield\43175.00 BESS Windsor Locks\Project\BESS Windsor Locks.aprx (srao: 7/31/2023)



Photo 1
Gravel Site Access



Photo 2
Gravel Site Access Looking into Project Area



Photo 3
View of Project Area



Photo 4
48" Pipe Inlet at North of Project Area



Photo 5
Viewing West Away from Project



Photo 6
Paved Site Access towards Ella Grasso Turnpike





Photo 7
Wetlands and Pipe Outfalls

Exhibit H

(Photo Simulation)



Windsor Locks View 1

Existing Condition

August 7, 2023
Source: VHB





Windsor Locks View 1

Proposed Condition

August 7, 2023
Source: VHB





Windsor Locks View 2

Existing Condition

August 7, 2023
Source: VHB





Windsor Locks View 2

Proposed Condition

August 7, 2023
Source: VHB





Windsor Locks View 3

Existing Condition

August 7, 2023
Source: VHB





Windsor Locks View 3

Proposed Condition

August 7, 2023
Source: VHB



Exhibit I

(SHPO Review)

July 26, 2023

Mr. David George
Heritage Consultants, LLC
830 Berlin Turnpike
Berlin, CT 06057
(sent only via email to dgeorge@heritage-consultants.com)

Subject: Archaeological Resources Assessment Survey of Proposed BESS Project
Ella Grasso Turnpike
Windsor Locks, Connecticut

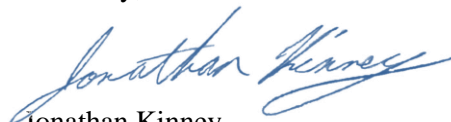
Dear Mr. George:

The State Historic Preservation Office (SHPO) received the report prepared by Heritage Consultants (Heritage) titled *Preliminary Archaeological Assessment Survey of a Proposed Battery Storage Facility Project Along Village Hill Road[sic] in Windsor Locks, Connecticut* dated December 2, 2022. The proposed project consists of the construction of a battery energy storage system (BESS) on a project parcel located along Ella Grasso Turnpike in Windsor Locks. The project will require approval from the Connecticut Siting Council. As a result, the proposed activities are subject to review by this office pursuant to the Connecticut Environmental Policy Act. Based on the information submitted to our office, the fieldwork appears to meet the standards set forth in the *Environmental Review Primer for Connecticut's Archaeological Resources*.

The archaeological assessment survey consisted of comprehensive background research that examined historic maps and aerial imagery as well as previously identified cultural resources in proximity to the project location. The survey identified two previously recorded archaeological sites (Sites 164-38 and 164-40) and one property listed on the National Register of Historic Places (NRHP) (Benomi Case House) within one mile of the proposed project area. Heritage completed a pedestrian survey of November of 2022. The results of the survey indicated the entirety of the Area of Potential Effect (APE) is characterized by significant prior disturbance. Therefore, Heritage concluded that APE has a no/low potential to yield intact archaeological deposits. Based on the information provided to our office, it is the opinion of SHPO that no historic properties will be affected by the proposed housing project and no additional archeological investigations are warranted.

This office appreciates the opportunity to review and comment upon this project. For additional information, please contact Cory Atkinson, Staff Archaeologist and Environmental Reviewer, at (860) 500-2458 or cory.atkinson@ct.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Kinney".

Jonathan Kinney
State Historic Preservation Officer