



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051  
Phone: (860) 827-2935 Fax: (860) 827-2950  
E-Mail: [siting.council@ct.gov](mailto:siting.council@ct.gov)  
Web Site: [portal.ct.gov/csc](http://portal.ct.gov/csc)

VIA ELECTRONIC MAIL

September 26, 2023

Lee D. Hoffman, Esq.  
Pullman & Comley LLC  
90 State House Square  
Hartford, CT 06103-3702  
[lhoffman@pullcom.com](mailto:lhoffman@pullcom.com)

RE: **PETITION NO. 1579** – 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. **Council Interrogatories to Petitioner, Set Two.**

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than October 17, 2023. Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto:siting.council@ct.gov). In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

**Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the October 17, 2023 deadline.**

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman  
Executive Director

MB/MP

c: Service List dated June 14, 2023

**Petition No. 1579**  
**KCE CT 9, LLC**  
**2 Ella Grasso Turnpike, Windsor Locks, Connecticut**

**Interrogatories**  
**September 26, 2023**

**Project Development**

60. Has KCE CT 9, LLC's (KCE) battery energy storage facility (BESF) been procured? Identify the manufacturer of the proposed batteries.
61. Referencing page 4 of the Petition, what is the status of the system impact study with Eversource? Is it anticipated the battery manufacturer/model will change based on the interconnection agreement?
62. How frequently would site visits be typically required for maintenance purposes?

**Public Safety**

63. Referencing Response to Council interrogatory 33, which version of the National Electrical Code (NEC) would the Project be designed for?
64. Identify the code/standard and section that addresses the minimum fence height for the BESF.
65. Referencing Petition Attachment A, Sheet C-5.0, an approximately 2-inch maximum gap is proposed between the bottom of the fence and grade. What animal deterrents are in place for small animals, such as nesting birds, chewing rodents, etc.?
66. Referencing the response to Council interrogatory 35, KCE notes that, "The battery units do come with a dry sprinkler system...activated when the responding fire department connects a tank truck to the system from outside of the container...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." Identify the guidance that recommends that the sprinkler system should not be used.
67. Explain why a dry sprinkler system (that requires outside fire department connection) was selected in lieu of an automatic sprinkler system with a dedicated water supply. Cite any codes/standards or guidance if applicable.
68. Would there be any water quality issues resulting from emergency response, e.g. use of foam?
69. Would the proposed facility have any on-site lighting? If yes, identify the type, location and potential visual impacts.
70. Referencing page 29 of the Emergency Operations Plan, a battery fire would be self-extinguishing. What is the typical duration of a battery fire before it self-extinguishes? If one battery caught fire, can it easily spread to adjacent batteries? Explain.
71. Would firewater or other runoff from a battery fire be considered hazardous and require cleanup by a hazardous materials response contractor?

72. Referencing page 3 of the Petition, please respond to the following:
- Could a battery potentially burst and release hazardous decomposition products when exposed to a fire situation?
  - If a battery burst, would smoke from the fire be considered hazardous and require notification to local authorities?
  - If a battery burst, would smoke require area residences to stay in place or evacuate? If yes, who would determine if these actions are necessary?
73. Provide a detailed standard operating procedure for emergency response and notifications in the event of a battery fire.
74. Would KCE dispatch personnel to the BESF in the event of a fire? Where would KCE personnel be located that can respond to site emergencies?
75. Would placards be installed at the facility to alert emergency responders as to how to extinguish a fire, the fire media to be used, and contact numbers to operators of the BESF? If yes, provide detail. If no, explain why such measures are not necessary.
76. Referencing the response to Council interrogatory 36a, KCE states an exhaust ventilation system would remove flammable gases during a potential battery failure. Is this ventilation system susceptible to fire and subject to failure? Is it within a fire enclosure?
77. What explosion mitigation system is more effective, vent panels or an exhaust system? Explain.
78. Has KCE considered an aerosol-based fire suppression system? If yes, what media would be used in such system?
79. Referencing pages 3 and 5 of the Petition, provide a safety data sheet for ethylene glycol, lithium-ion phosphate and other materials, as applicable, that would be associated with the proposed batteries.
80. Referencing Council interrogatories 25 and 27, inverter step-up transformers and an auxiliary power transformer are proposed.
- Provide a transformer oil safety data sheet.
  - How much oil is contained within each transformer?
  - Are there alarms (such as low-level oil alarms) that can alert personnel of a leak? If not, how would a leak be detected?
  - Do the transformers have a leak containment system? If yes, describe.