



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

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

September 13, 2023

Michelle Neri
P.O. Box 548
Westbrook, CT 06498
homemade.ad@protonmail.com

RE: **PETITION NO. 1586** - Dominion Energy Nuclear Connecticut, Inc. petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, that neither a new Certificate of Environmental Compatibility and Public Need (Certificate) nor a modification to its existing Certificate is required to revise the boundaries of the Millstone Power Station electric generating facility site located off Rope Ferry Road, Waterford, Connecticut. **Request for Intervenor Status. Request for Public Hearing.**

Dear Michelle Neri:

The Connecticut Siting Council (Council) is in receipt of your correspondence of September 7, 2023 and September 12, 2023 requesting Intervenor status under Connecticut General Statutes (C.G.S.) §4-177a and §16-50n, in Petition No.1586 and a Public Hearing.

Your requests will be placed on the next meeting agenda, a copy of which will be sent to you. Your attendance is welcome but is not required. You will be notified of the Council's determination immediately thereafter.

Please be advised that pending requests for a public hearing on Petition No. 1586 received from other interested persons are on the Council's September 14, 2023 meeting agenda.

While your request is pending, information regarding Party/Intervenor Status may be accessed on the Council's website at the following link: <https://portal.ct.gov/CSC/Public-Participation/Public-Participation/Public-Participation-Information-Links>.

All documents filed to date are available at the Council's office or on our website under pending matters.

Please contact me if you have any questions.

Sincerely,

Melanie A. Bachman
Executive Director

MAB/RDM/dll

c: Service List dated July 28, 2023
Council Members

From: homemade <homemade.ad@protonmail.com>
Sent: Thursday, September 7, 2023 4:35 PM
To: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: Public Comment Petition 1586

For the Siting Councils Consideration:

In the case of PETITION NO. 1586 – Dominion Energy Nuclear Connecticut, Inc. petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, that neither a new Certificate of Environmental Compatibility and Public Need (Certificate) nor a modification to its existing Certificate is required to revise the boundaries of the Millstone Power Station electric generating facility site located off Rope Ferry Road, Waterford, Connecticut.

As a resident, I request that the Siting Council hold a public hearing on the matter. I request interventor status.

In regards to public commentary:

I understand that this request that Dominion has filed on behalf of the NE Edge site for a declaratory ruling is related specifically to the boundary revision, but they are also suggesting they do not need to have a Certificate of Environmental Compatibility and Public Need, nor a modification to its existing Certificate in regards to this land.

Dominion argues that they do not need this Certificate to be renewed or modified because NE Edge Data Center is not associated with Dominions Electric Generating Operations, but that is a misrepresentation of what they have openly discussed with the public at public meetings. Dominion will have a symbiotic relationship with NE Edge Data Center for many reasons. They will be the sole provider of electricity for the Data Center facility and they will be using Dominions backup generators for the Data Center facility. NE Edge will be solely reliant on Dominion and Dominion has exclusive contracts to do so with NE Edge.

The facility will be on leased land, NE Edge will not be buying this land from Dominion. The land will belong to Dominion for the entirety of the Data Centers 30 year tax incentive.

Most importantly, Dominion has misrepresented their intent with the Siting Council. Dominion does plan to purchase and own the Data Center facilities, it has been openly discussed and promised to the public.

Dominion has a vested interest in this facility and will be the owners of this facility, NE Edge is a company that plans to sell the Data Center. Though I understand it is not a concern of the Siting Council, the Council should know that this is likely an attempt for Dominion to have their entire facility Tax-Exempt. If you read the agreements made with the town, the agreement does not have protective language to prevent this from happening. Dominion is the highest taxed property in the town of Waterford and one of the highest taxed in the State.

Upon reading Dominions responses to the interrogatories that the Siting Council made, I will say that many of their responses were clearly opinion based, and not based in any fact at all. Residents are highly concerned with their responses. They should be required to provide substantiation to the claims that they are making in their answers to the Siting Council. I will go through a few of them to help illustrate why we are concerned.

In question three they said that "it is expected that the changes will have minimal to no impact on safety" when asked if the Nuclear Regulatory Commission requirements apply to the proposed site boundary revision for the Data Center Lease area. As of now, no NRC evaluation has been done. The Data Center does not have a finished plan, nor have they gone through the process. To suggest that the area will have minimal impact is an assumption based in opinion. No studies have been performed to evaluate the impact that the 5 years of construction will have on the facilities or their day-to-day operations. Likely if they have to blast on the proposed site it will have an impact on the facilities. It is very likely they will unless they can truckload hundreds of thousands of trucks of soil in to level the site for the 1.5 million square foot buildings. They will most likely have to shut down operations multiple times during the construction for a variety of reasons, more specifically to test the direct connection they will be making to the facility.

In question nine they avoid answering whether or not the facility will be repurposed by Dominion. Dominion has said they will be buying the facility. They also said there is no plan to decommission the buildings. In recent memory, a pharmaceutical company received a large tax break to build facilities in New London. To build the facilities they used eminent domain and moved many residents out of the area. Once the tax agreement ran out, they abandoned those buildings and left. Those facilities were never decommissioned. Some of the outer buildings were able to be used by a few businesses, but most were abandoned. This is a cautionary tale that shouldn't be ignored. They should be required to have a decommission plan, especially considering the unique building style of concrete and no windows, which can not be turned into anything other than a Data Center because of building codes and requirements for safety.

In regards to question ten, the construction of the Data Center will increase traffic quite significantly. They will be changing the area completely. There will be all new access roads and driveway entrances built. The constant influx of construction workers will absolutely impact Dominion's access. They will be trucking in over 2,000 employees every day for five years, along with thousands of truckloads of soil, thousands of truckloads of concrete, or build a batch plant on site, and every major type of equipment needed to build a 70+ foot tall, 1.5 million sq foot facility. They have also made it clear that every 2 years, for a six month period of time there will be a massive influx of employees at the Data Center. The Data Center has to completely replace millions of servers every two years, so they will not only have 120 employees as they have suggested.

While I do not understand the complexities of how the Data Center will connect to Dominion, it has been spoken about that they may use Eversource as a backup if there is a power outage. In question eleven they said otherwise, but they should have to prove that that is true, and substantiate that claim.

Simply responding "No" to question fifteen, without any information to back up that claim is very concerning. They likely will have adverse impacts. The area is permitted for the Nuclear Power Plants use alone and other businesses should not have been permitted to use this land. The land was designated for future expansion of the Nuclear facilities or open space. Dominion should have to provide proof that their land is approved to do anything otherwise. A concern being the storage of spent Uranium. As of now the facility holds 2400 metric tons of spent Uranium. The Federal Government has made no plans for any Nuclear facility to move their spent Uranium. Once the facilities pools are full, where will the next pool be built? Shouldn't there be a large buffer zone between the spent Uranium and any of the Data Centers facilities? Likely, they will need new pools for storage during the 30 year host agreement timespan and that should be accounted for in this boundary revision.

One of the biggest concerns of townspeople is question eighteen. The Data Center will without a doubt have a very significant noise impact. This noise impact will cause major environmental harm and affect the public that owns hundreds of homes directly near the facility. Although this is a review of the boundary, this should be considered by the Siting Council.

In question twenty-six they suggested, "DENC does not anticipate any significant change to the visual character of the MPS site. The location of the data center is deep within the MPS site and is not expected to be visible from most locations in the surrounding communities." This statement is purely opinion and not factual at all. The facility will have a massive visual impact on both the hundreds of residential homes nearby, as well as the dozens of businesses and hundreds of homes across the Niantic Bay. The buildings are going to be larger than any other facility built in our town, or any town nearby. They will total 1.5 million square feet. They will be over 70 feet tall and have no windows, only concrete. The total square footage of the facilities will be three times larger than the Crystal Mall, which has a very significant visual impact, for comparison. They will also be building 2 more facilities of which they have said will be built on the Dominion land. They have not yet said how many square feet they will be, but they will likely be around 70 feet tall or more as well. Dominion suggests that there will be 204 acres of open space land after the first two are built, so likely they will attempt to make the other two just as large.

In previous discussion with the Siting Council, it has been suggested that the concerns that I have highlighted in my public comment may not apply to this declaratory ruling because it is a boundary revision request, but I ask you to please understand why I am highlighting these concerns. Dominion has suggested that they plan to purchase the Data Center. They are modifying land that will still be in their ownership. A Certificate of Environmental Compatibility and Public Need (Certificate) and a modification to its existing Certificate should be required for this change on Dominion's land. They own the land and the land was designated for Nuclear Power Plant Use and should be used for those purposes, not to lease to a business. I would also like to illuminate that if they were not doing anything different to the land then what is allowed,

they wouldn't need to request this change, which is a change of use. They should have to disclose more information about the open space and their original approved use for the land, and what their intended use of the remaining open space.

The safety impacts of Dominion allowing this facility to be built on their land will be significant to the public and the environment during construction and long after it is built as the land is going from pristine, undeveloped land with marked critical habitats, wetlands and watercourses that lead out to the ocean, to large concrete buildings and parking lots. This is a massive change and should not be allowed to bypass the safeguards of the Certificate of Environmental Compatibility and Public Need process. In a 2015 study, of all the power plants in America, the Dominion Millstone Point Plant was determined to be the #1 most high risk facility in the country. There are many risks of building directly near open pools of spent Uranium as has been suggested by the NRC. This should be considered when making this declaratory ruling.

(Study Cited Below)

<https://link.springer.com/article/10.1007/s13753-015-0075-0/tables/2?fbclid=IwAR20vpBvRQMMYTe8Z2ip0bKu7XBb3Rxb9Ggq3nOiL4hQvYU8v--edyB4mME>

I apologize for my long response and I appreciate you taking the time to read it.

Thank you,
Michelle Neri



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PARTY STATUS REQUEST FORM

Docket/Petition No.

158

Town/City

Waterford

Date

9/7/2023

Name:

Michelle Neri

Street Address:

P.O. Box 548

City, State, Zip:

Westbrook, CT, 06498

Contact Number:

E-mail:

homemade.ad@protonmail.com

1. Manner in which party's legal rights, duties, or privileges will be specifically affected by the agency's decision in this contested case:

Live and work in the Town of Waterford. Our family will be greatly affected by the building on this land.

2. Manner and extent to which party proposes to participate:

Participation will be limited to observing proceedings and/or making comments and presenting information that pertains to this specific issue.

3. Statutory authority for party status request:

n/a

4. Nature of evidence that the party intends to present:

To be determined.

Copies of this request are required to be electronically mailed to all participants on the service list of a **pending** matter, which can be found on our website in Pending Matters under the appropriate docket or petition number.

Signature

Date



9/7/2023