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August 30, 2023

Via Hand Delivery

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

Re: **Petition No. 1586 - Dominion Energy Nuclear Connecticut, Inc. – Petition for a Declaratory Ruling on the Need to Obtain a New or Modify an Existing Siting Council Certificate to Modify the Boundary of the Site at the Millstone Power Station, Waterford, Connecticut**

Interrogatory Responses

Dear Attorney Bachman:

On behalf of Dominion Energy Nuclear Connecticut, Inc. (“Petitioner”), enclosed please find the original and fifteen (15) copies of the Petitioner’s Responses to the Council Interrogatories for Petition No. 1586. Electronic copies of these responses have also been sent to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kenneth C. Baldwin

KCB/kia
Enclosure

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
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 :
 A PETITION OF DOMINION ENERGY : PETITION NO. 1586
 NUCLEAR CONNECTICUT, INC. FOR A :
 DECLARATORY RULING ON THE NEED TO :
 OBTAIN A NEW OR MODIFY AN EXISTING :
 SITING COUNCIL CERTIFICATE TO MODIFY :
 THE BOUNDARY OF THE SITE AT THE :
 MILLSTONE POWER STATION, WATERFORD, :
 CONNECTICUT : AUGUST 30, 2023

**RESPONSES OF DOMINION ENERGY NUCLEAR CONNECTICUT, INC
TO CONNECTICUT SITING COUNCIL INTERROGATORIES**

On August 9, 2023, the Connecticut Siting Council (“Council”) issued Interrogatories to Dominion Energy Nuclear Connecticut, Inc. (“Petitioner”), relating to Petition No. 1586. Below are the Petitioner’s responses.

Notice

Question No. 1

Has Dominion Energy Nuclear Connecticut, Inc. (DENC) met with the Town of Waterford (Town) and/or submitted any proposed site plans or applications for land use and environmental permitting with the Town? What comments and concerns were expressed by the Town?

Response

As discussed in the Petition, NE Edge, LLC (“NE Edge”) is leading the development of the data center project and interacting directly with the Town of Waterford on this opportunity. We understand the Town of Waterford entered into a Municipal Host Fee Agreement with NE Edge for this data center. We are not aware of any concerns expressed by the Town.

Question No. 2

Has DENC received any comments from the Town since the filing of the Petition?

Response

Yes. In the First Selectman's letter dated August 23, 2023, to Melanie A. Bachman, Executive Director of the Connecticut Siting Council, the Town of Waterford supports DENC's petition and agrees with DENC that neither a new Certificate of Environmental Compatibility and Public Need nor a modification to its existing certificate is required to revise the boundaries of MPS.

Question No. 3

What United States Nuclear Regulatory Commission (USNRC) requirements apply to the proposed site boundary revision for the lease and collocation of the data center within DENC property boundaries? How will DENC comply with these requirements?

Response

The site boundary is described within the Final Safety Analysis Reports (FSAR). Revisions to the FSAR's are governed by the 10CFR50.59 process to evaluate changes. DENC will review the FSAR's, and assess the changes needed using the 50.59 process. It is not anticipated that prior USNRC approval will be required as it is expected that the changes will have minimal to no impact on safety.

Question No. 4

What ISO-New England, Inc. (ISO-NE) requirements apply to the proposed interconnection of the data center switchyard to the Millstone Power Station (MPS) switchyard?

Response

One potential ISO-NE requirement is that ISO-NE might need to review its existing Interconnection Agreement with MPS to determine whether the description of the MPS facilities would need to change in the existing Interconnection Agreement. Dominion does not believe that there are ISO-NE interconnection requirements that apply to NE Edge itself.

Existing Facility Site

Question No. 5

Referencing Petition p. 3, Lease Area 1 is a vacant area used periodically for equipment and material storage during site development activities. Where on the existing facility site would DENC establish a new area for this purpose?

Response

DENC currently utilizes several existing open areas on the 526 acres MPS parcel for equipment and material storage, from time to time, as needed for site development projects. Presently, DENC is not using any portion of Lease Area 1 for this purpose. Most of the area identified as Lease Area 1 remains wooded.

Question No. 6

Referencing Petition p. 3, Lease Area 2 is partially wooded, contains the existing salt shed and is used to store equipment or trailers temporarily. Where on the existing facility site would DENC establish a new area for these purposes? How would DENC continue to access/manage the salt shed during the lease term?

Response

DENC would plan to relocate the existing sand and salt shed to another nearby location on MPS property, yet to be determined. DENC will notify the Council once a new location has

been selected.

Question No. 7

Referencing Petition p. 3, Lease Area 3 is a vacant area used periodically for equipment and material storage during site development activities. Where on the existing facility site would DENC establish a new area for these purposes?

Response

Presently, DENC is not using any portion of Lease Area 3 for equipment and material storage. When needed, DENC would plan to use other areas on MPS property for equipment and material storage, yet to be determined.

Facility Site Revision

Question No. 8

What is the term of the lease for the three areas? Are there any lease provisions for restoration of the three areas at the end of the data center's useful life?

Response

The terms of the ground lease between DENC and NE Edge are not yet final, but it is expected to be in place for a long-term period. DENC would also expect that the ground lease would require removal of all equipment and restoration of the three areas at the end of the data center's useful life.

Question No. 9

Could the data center buildings and/or switchyard be repurposed by DENC for MPS operations at the end of the lease term? If not, are there lease provisions for decommissioning of the data center and/or its switchyard at the end of the lease term?

Response

The ground lease between DENC and NE Edge has not yet been finalized. At this time, neither DENC nor NE Edge are considering repurposing the buildings or switchyard at the end of the lease term.

Question No. 10

How would construction and operation of the data center and its switchyard impact current access to MPS? For example, would there be increased traffic, separate driveway entrances and gates, additional security protocols, etc.? Explain.

Response

If the data center use is approved by the Town of Waterford, DENC would work with NE Edge to develop a traffic safety and access plan for construction and operation of the data center use. With this plan in place, no adverse traffic impacts are anticipated. Construction is expected to be phased to minimize active areas of work, and construction material, parking, and storage areas will be identified with separate driveway connections to Millstone Road. Adequate construction driveway lengths will be provided in advance of security fences and buildings to ensure adequate queuing without backup onto Millstone Road. During operations, we understand that the data center will employ 120 people, over 3 shifts, potentially 40 cars per shift. Each building will be surrounded by separate security fencing with 24/7/365 security staff on site.

Question No. 11

How would the data center switchyard interconnect with the existing MPS switchyard? What modifications would be required at the existing switchyard for this interconnection?

Response

The primary source of power for the data center will be from the MPS Units 2 and 3 generator terminals directly, which does not require a connection to the MPS/Eversource switchyard. The details of the electric interconnection design have not yet been completed.

Question No. 12

What system impact studies has DENC and/or Eversource conducted to ensure that the data center interconnection would not adversely affect the safe and reliable operation of MPS and Eversource's electric distribution system?

Response

The electrical supply from MPS to the data center is in the initial conceptual phase. When the final design has been vetted, it will be determined what studies are required by any third party(s), if any.

Question No. 13

Is the interconnection required to be reviewed by ISO-NE? Why or why not?

Response

See DENC's responses to Interrogatory Nos. 4 and 12 above.

Question No. 14

What is the anticipated maximum load in megawatts from operation of the data center?

Response

The anticipated maximum load is estimated to be approximately 300 MW.

Question No. 15

Would operation of the data center and its switchyard have any potential adverse impact on any of DENC's obligations to federal, state or regional entities under any permit, contract or license (ex. reserve margin, operating reserves, maintenance)? If so, how will DENC address

these potential impacts?

Response

No.

Question No. 16

Would interconnection of the data center to MPS have any impact on MPS' winter or summer reliability?

Response

No.

Public Safety

Question No. 17

In the event of a fire or other emergency associated with the data center and/or its switchyard, would MPS revise its Emergency Response Plan to include Lease Areas 1-3? Would the data center and its switchyard also have a separate Emergency Response Plan? Explain.

Response

NE Edge would be responsible for emergency planning for the data center use and operations. NE Edge will cooperate with DENC and the Town of Waterford to complete a response plan specific to the data center use.

Question No. 18

How would operation of the data center and its switchyard contribute to existing background noise levels at the MPS site? Would expected cumulative noise levels from the operation of MPS, the data center and its switchyard comply with state noise control regulations?

Response

DENC does not have information on the expected noise levels from the proposed data center and switchyard operations but would expect that those issues would be addressed through the Town's land use regulatory process. DENC understands that the NE Edge plans to install sound attenuation measures and will meet all state noise control regulation.

Question No. 19

Does the location of the data center and its switchyard comply with the NRC minimum distance requirement within an owner-controlled area?

Response

As discussed above in response to Interrogatory No. 3, DENC will assess the Site boundary revisions and any associated minimum distance requirements using the NRC's 50.59 process. It is not anticipated that prior USNRC approval will be required as it is expected that the changes associated with the data center will have minimal or no impact on safety at MPS.

Question No. 20

What is the distance from the rail line to the proposed data center switchyard? Does this distance comply with the National Electrical Safety Code (NESC)?

Response

The final design and layout of the new switchyard has not yet been completed. That said, the design, construction and operation of the switchyard will comply with all federal, state and local laws and regulations.

Question No. 21

Would the construction of the data center switchyard require notification to the operator of the rail line and/or require any construction-related safety measures?

Response

The design of the switchyard has not yet been fully developed. As a part of that design, all construction-related safety measures will be evaluated. Notice will be provided to the operator of the rail line if required.

Question No. 22

Do any Occupational Safety and Health Administration restrictions apply to activities beneath the electric lines associated with the data center in Lease Area 2?

Response

There are currently no overhead electrical lines through Lease Area 2.

Environmental Effects and Mitigation Measures

Question No. 23

Referencing Petition Exhibit 1, Connecticut Siting Council Site Plan, Map References 2A-2D, did any of the wetland scientists who performed the wetland and watercourse delineations recommend any mitigation measures for the protection of the wetlands and watercourses on or traversing Lease Areas 1-3. If yes, what are the recommendations?

Response

According to NE Edge, the data center building footprints and associated roadways and site amenities have been located to minimize disturbance on inland wetlands and provide adequate separation to sensitive areas.

Question No. 24

Referencing the attached State Plan of Conservation and Development Map by GZA, dated December 20, 2011 (Attachment 9 to the Docket 265A application), what impact would development of Lease Areas 1-3 for the data center and its switchyard have on the identified

“Preservation Areas”?

Response

According to NE Edge, the “preservation areas” identified in green on the referenced map (Docket 265A Attachment 9) to the north of the railroad corridor and in the vicinity of Lease Areas 1-3 align with the limit of wetland soil types identified on Natural Resources Conservation Service Soil Survey mapping. There will be no work associated with the development of Lease Area 1-3 within these “preservation areas”. Further, each development will be designed with adequate separation to inland wetlands. No adverse impacts are anticipated.

Question No. 25

What is the approximate acreage of vegetative clearing required to develop Lease Areas 1-3 for the data center and data center switchyard?

Response

The area of wooded and scrub vegetation to be cleared and grubbed is estimated as follows:

- Lease Area 1 approximately 24 acres
- Lease Area 2 approximately 9 acres
- Lease Area 3 approximately 1 acre

Question No. 26

How would construction of the data center and its switchyard change the visual character of the area surrounding the existing MPS site?

Response

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.

Question No. 27

How would construction of the data center and its switchyard impact the current open space areas on the MPS site? What is the current acreage of the existing open space areas on the MPS site and what would be the approximate acreage of the remaining open space areas on the MPS site post-data center development?

Response

As requested in the Petition, DENC seeks to remove 55 acres (Lease Areas 1 and 2 and 3) from the previously defined MPS site. With the exception of the developed portion of Lease Area 2 (existing Sand and Salt Shed ~ 2 acres) a majority of this area of land north of the rail line would currently be considered “open space” (currently approximately 257 acres of the MPS land area north of the railroad are considered open space). DENC estimates that the MPS land area north of the rail line would continue to maintain approximately 204 acres of open space following the development of the NE Edge data center ($257-55+2=204$ acres).

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of August, 2023, a copy of the foregoing was sent,
via electronic mail, to:

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