

BRUCE L. MCDERMOTT
203.772.7787 DIRECT TELEPHONE
860.240.5723 DIRECT FACSIMILE
BMCDERMOTT@MURTHALAW.COM

November 29, 2023

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

Re: Petition No. 1588 – Endurant Energy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 7.0-megawatt AC battery energy storage facility located at 22 Deerfield Road, Windsor, Connecticut, and associated electrical interconnection.

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council (“Council”) are Endurant Energy’s responses to the Council’s November 14, 2023 interrogatories (Set 2).

An original and fifteen (15) copies of this filing will be delivered to the Council.

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

Very truly yours,



Bruce L. McDermott

Enclosures

Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
T 203.772.7700
F 203.772.7723

Interrogatory CSC 52
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 52: Referring to interrogatory response 4, it states the contract is extendable. Would Endurant seek to extend the 10-year contract? If yes, would battery replenishment/replacement be considered at that time?

A-CSC 52: Endurant does not currently intend to seek a contract extension, but it does not rule out the possibility. Taylor & Fenn would also have to be willing to extend the relationship. The economic viability would depend on the time and cost of capacity maintenance – if Endurant were to extend, yes, it would anticipate that some form of replenishment, augmentation or replacement would be required.

Interrogatory CSC 53
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 53: Who is the owner of the host parcel?

A-CSC 53: Taylor & Fenn Company owns the host parcel.

Interrogatory CSC 54
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 54: What is the approximate size of the limit of disturbance required to construct the facility?

A-CSC 54: The fenced area will be less than 7,000 square feet. The disturbance beyond that footprint required to construct the facility will be minimal and temporary, such as parking for the battery transportation vehicle and crane.

Interrogatory CSC 55
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 55: Referring to Petition p. 18, it states “Fencing slats will be used to screen the Project equipment”. Fencing slats are not shown on the Site Plans provided with Interrogatory response 49. Are screening slats proposed? If yes, provide detail.

A-CSC 55: The fencing referred to is perimeter fencing. The fence will be a chain link style fence, with privacy screening inserts. Final details will be determined in consultation with the Host Site during construction permitting, but Endurant’s standard suggestion is a dark green option, to blend with the surrounding environment, and not be out of keeping with the industrial setting.

Interrogatory CSC 56
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 56: Decommissioning Plan p. 2 refers to a palisade perimeter fence. Why was the fence design changed to chain link?

A-CSC 56: The Decommissioning Plan was incorrect and has been updated to reflect chain link fencing – The sentence in question now reads *'The BESS containers will be installed upon concrete pads and the entire BESS will be enclosed by 8 feet high chain link fencing, enclosing an area of approximately 7,000 square feet.'*

Interrogatory CSC 57
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 57: Is the facility interconnection required to be reviewed by ISO-NE?

A-CSC 57: Yes. ISO-NE is currently undertaking an Affected System Operator (ASO) study.

Interrogatory CSC 58
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 58: Would Endurant participate in the ISO-NE Forward Capacity Market?

A-CSC 58: The BESF will be enrolled in the ISO-NE Forward Capacity Market by CPower, who are providing dispatch optimization services for the battery via their proprietary Enerwise software. This will be done via the ISO-NE Passive (On-Peak) Demand Response program.

Interrogatory CSC 59
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 59: Would Endurant participate in any other ISO-NE markets (ex. ancillary services)?

A-CSC 59: The ESS Program will be the priority for the battery under all circumstances, however Endurant would participate in any markets that opened up to BESS that did not negatively impact the ESS Program.

Interrogatory CSC 60
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 60: Referring to interrogatory response 23, will the facility be designed in accordance with the 2022 Connecticut State Fire Code Chapter 52- Energy Storage Systems?

A-CSC 60: Yes. This will be confirmed during the Fire Plan Review stage of construction permitting, in coordination with the Windsor Volunteer Fire Department and Town of Windsor Building and Fire Safety Department.

Interrogatory CSC 61
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 61: Referring to interrogatory response 32, what was the fire department's concern regarding use of the access lane between the main Taylor & Fenn building and the auxiliary building?

A-CSC 61: The fire department was initially concerned that a) the access might not be clear of impediments and b) they did not want to put personnel or equipment at risk by having it situated between two buildings, should either of those two buildings catch fire. These items have been resolved. Firstly, Endurant ensured that the BESF is close to the fence line on the northern perimeter of the host property, allowing maximum turning space for firefighting equipment. Then on November 16, 2023 the Fire Inspector emailed to inform Endurant that they had undertaken a site visit and survey: "After surveying the site we found that the closest fire hydrant to the stored energy site on Taylor and Fenn's property is directly across from the alley access. With this in mind we may need to allow for fire department vehicle access down the alleyway to get the stored energy site." Endurant agreed that a Memorandum of Understanding should be obtained from Taylor & Fenn as part of the Fire Plan Review, confirming that the width of the alley will not be diminished with storage, dumpsters, trailers or any other obstacles that would create an impediment to fire department vehicle access. The Fire Inspector confirmed that he does not believe that an additional access road is required, although Endurant remains happy to build one should it be needed, which will be confirmed by the Fire Department during the Fire Plan Review phase of construction permitting. The Fire Inspector wrote "The access road for fire department vehicle access is less likely based on the lack of a water supply in the area of the cul-de-sac."

Interrogatory CSC 62
(Set 2)

Endurant Energy
Docket No. 1588

Witness: Brian Mehler
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Q-CSC 62: What is the distance of the nearest municipal fire hydrant to the facility? What alternative water sources are available? How would water be brought to the site?

A-CSC 62: The nearest municipal fire hydrant is 5 feet from the facility, on the northern boundary of the property. An additional hydrant is approximately 275 feet to the south, at the southern end of the access alley. The Fire Department informed Endurant that the facility directly to the north of the property, 92 Deerfield Road, has a private hydrant network that could be accessed as an alternative source of water. Endurant will discuss this with the property owner during Fire Plan Review stage. Finally, the Fire Department has access to water tanker fire trucks which could bring water to the site.

