



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

November 14, 2023

Bruce McDermott, Esq.
Murtha Cullina LLP
One Century Tower
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New Haven, CT 06510-1220
bmcdermott@murthalaw.com

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. **Council Interrogatories to Petitioner- Set 2.**

Dear Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than December 5, 2023. Please submit an original and 15 copies to the Council's office and an electronic copy to 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 December 5, 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/RM

c: Service List dated August 17, 2023

**Petition No. 1588
Endurant Energy
22 Deerfield Road, Windsor, Connecticut**

**Interrogatories- Set 2
November 14, 2023**

Project Development

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?

Proposed Site

53. Who is the owner of the host parcel?
54. What is the approximate size of the limit of disturbance required to construct the facility?
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.
56. Decommissioning Plan p. 2 refers to a palisade perimeter fence. Why was the fence design changed to chain link?

Interconnection

57. Is the facility interconnection required to be reviewed by ISO-NE?
58. Would Endurant participate in the ISO-NE Forward Capacity Market?
59. Would Endurant participate in any other ISO-NE markets (ex. ancillary services)?

Public Safety

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?
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?
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?