



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

June 7, 2024

Mark J. Cook, Esq.
Tobin, Carberry, O'Malley, Riley & Selinger, P.C.
43 Broad Street, P. O. Box 58
New London, CT 06320
mcook@tcors.com

RE: **PETITION NO. 1607** – Hanwha Q Cells America, Inc. petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4.0-megawatt AC battery energy storage facility located at Parcel No. 95-F10-247-5 and 95-F10-247-5A, 163 State Pier Road, New London, Connecticut, and associated electrical interconnection. **Request for Additional Extension to Submit Interrogatory Responses.**

Dear Attorney Cook:

The Connecticut Siting Council (Council) is in receipt of your request for an additional extension of time to respond to interrogatories for the above-referenced petition for a declaratory ruling dated June 6, 2024.

Pursuant to Section 16-50j-22a of the Regulations of Connecticut State Agencies, the Council hereby grants the request for an additional extension of time to June 28, 2024.

Sincerely,

Melanie Bachman
Executive Director

MAB/RDM/dll

c: Service List dated January 8, 2024



Tobin, Carberry, O'Malley, Riley & Selinger, P.C.

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June 6, 2024

Via Electronic Mail and U.S. Certified Mail

Melanie Bachman
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition No. 1607 - Hanwha Q Cells America Inc. petition for a declaratory ruling, pursuant to Connecticut General Statutes § 4-176 and § 16-50k, for the proposed construction, maintenance and operation of a 4.0-megawatt AC battery energy storage facility located at Parcel No. 95-F10-247-5 and 95-F10-247-5A, 163 State Pier Road, New London, Connecticut and associated interconnection. **Request for Additional Extension to Submit Interrogatory Responses.**

Dear Ms. Bachman:

I am writing on behalf of my client Hanwha Q Cells America Inc. ("Petitioner") in connection with the above-captioned Petition.

On May 7, 2024, Petitioner requested a second extension of time in which to provide responses to the Council Interrogatories to Petitioner - Set 2 ("Second Set of Interrogatories") issued by the Connecticut Siting Council ("Council"). Petitioner stated it was in discussions with The Connecticut Light & Power Company d/b/a Eversource Energy regarding the final interconnection design and the results of those design discussions may influence Petitioner's answers to the Second Set of Interrogatories. The Council granted Petitioner's request on May 13, 2024 and the current date for Petitioner to provide responses to the Council's Second Set of Interrogatories is June 10, 2024.

On May 13, 2024, Petitioner submitted its Request and Written Consent for Extension to Deadline for Decision ("Request for Extension of Deadline") requesting the deadline for the Council to render a final decision in the instant Petition be extended to August 21, 2024. The Petitioner explained that the interconnection design has in fact required changes to Petitioner's originally proposed Battery Energy Storage Facility ("BESF") equipment. The Council granted Petitioner's Request for Extension of Deadline to August 21, 2024.

Petitioner is diligently working on crafting responses to the Second Set of Interrogatories as well as supplementing the applicable information Petitioner has provided the Council to date based on the change in BESF equipment. As a result of the change in equipment and in an effort to provide a full and complete response to the Second Set of Interrogatories as well as to supplement applicable information provided to date, additional time is required past June 10, 2024.

For the reasons set forth above and pursuant to § 16-50j-22a of the Regulations of Connecticut State Agencies, the Petitioner respectfully moves for an additional extension of time in which to provide responses to the questions contained in Council Interrogatories to Petitioner - Set 2 to June 28, 2024. This timeline aligns with the extended August 21, 2024 deadline for decision for this Petition.

The Council's consideration of this request is appreciated.

The original and fifteen copies of this request are being mailed via U.S. Certified Mail to the Council's office.

I hereby certify that a copy of the foregoing document was sent via electronic mail to the service list for Petition No. 1607 on June 6, 2024.

Please do not hesitate to contact me with any questions or concerns regarding this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark J. Cook".

Mark J. Cook, Esq.