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September 23, 2025

Via Electronic Mail and Hand Delivery

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

RE: **PETITION NO. 1607A** - 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. Reopening of this Petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b). **Petitioner Responses to Council Interrogatory Nos. 9.b; 9.c; 10.a-10.e; 11-14 to Petitioner issued on August 19, 2025**

Dear Attorney Bachman:

I am writing on behalf of my client Hanwha Q CELLS America Inc. ("HQCA" or "Petitioner"). HQCA respectfully submits herewith its responses to Connecticut Siting Council ("Council") Interrogatory Nos. 9.b; 9.c; 10.a-10.e; 11-14 to Petitioner issued on August 19, 2025 and pursuant to the Council's grant of Petitioner's request for an extension of time to provide responses to Interrogatory Nos. 9.b; 9.c; 10.a-10.e; 11-14 dated September 4, 2025.

Please find enclosed the original and fifteen copies of Petitioner's responses to Interrogatory Nos. 9.b; 9.c; 10.a-10.e; 11-14 and corresponding Attachment D – Megapack 2XL Safety Overview – Response to Interrogatory No. 12.

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

I certify that copies of this submission have been sent to all parties on the Service List as of this date.

Sincerely,

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

Mark J. Cook, Esq.

Enclosures
cc: Service List

Petition No. 1607A
Hanwha Q CELLS America, Inc.
Parcel No. 95-F10-247-5 and 95-F10-247-5A, 163 State Pier Road, New London

Hanwha Q CELLS America Inc. Responses to Interrogatory Nos. 9.b; 9.c; 10.a-10.e; 11-14

September 23, 2025

Proposed Site

9. Please provide the following:
- b. distance of the nearest edge of the BESF fence and battery container to the abutting parcel to the south? Identify the use of this parcel.

The area immediately to the south consists of a portion of the State of Connecticut right-of-way which abuts the Connecticut Route 32 roadway. That portion of the right-of-way does not have any structures save for one streetlight, one pole, and one utility cabinet and is otherwise populated with a mature tree canopy.

While the perimeter edge of the International Association of Fire Chiefs' ("IAFC") 150-foot initial firefighter staging area radius ("150-foot IAFC Guidance") touches the outside northeasterly edge of the shoulder area of Route 32, the 150-foot IAFC Guidance radius does not fall on the main portion of the northeast shoulder or the driving lanes of Route 32.

In addition, HQCA's fire response organization partner, Fire & Risk Alliance recommends a 100-foot exclusion zone upon arrival of the Fire Department. The 100-foot exclusion zone can be adjusted based on real-time events.

The distance from the nearest edge of the BESF fence to the area immediately to the south is 44-feet. The distance from the nearest edge of the battery container to the area immediately to the south is 58-feet.

The parcel south of Route 32 hosts an apartment complex. The distance from the nearest edge of the BESF fence to the property line of the parcel south of Route 32 is approximately 330-feet. The distance from the nearest edge of the battery container to the property line of the parcel south of Route 32 is approximately 340-feet.

- c. distance of the nearest edge of the BESF fence and battery container to the nearest residential property line.

The nearest parcel hosting a residential use is New London Assessor ID: Parcel F09-247-7. Parcel F09-247-7 is designated a Commercial-General zone by the City of New London. The distance from the nearest edge of the BESF fence to the nearest property line of Parcel F09-247-7 is 67-feet 11-inches. The distance from the nearest edge of the BESF battery container to the nearest property line of Parcel F09-247-7 is 90-feet 11-inches. The area of Parcel F09-247-7 closest to the eastern portion of the host parcel has a mature tree canopy, is not developed, and is not in use currently. The distance between the nearest BESF battery

container and the apartment complex structure is 154-feet 11-inches, which is outside the 150-foot IAFC Guidance.

This Petition No. 1607A is similar to Petition No. 1637 in that a portion of the 150-foot IAFC Guidance radius would fall on an “abutting property” (*See* Petition No. 1637, Findings of Fact, Jan. 23, 2025, Finding of Fact No. 184, p. 20) which is not owned or controlled by the petitioner or the petitioner’s property owner, is not developed, and which is not in use currently (*Id.*).

In addition, HQCA’s fire response organization partner, Fire & Risk Alliance recommends a 100-foot exclusion zone upon arrival of the Fire Department. The 100-foot exclusion zone can be adjusted based on real-time events.

The nearest parcel with a residential zoning designation by the City of New London is New London Assessor ID: Parcel F11-206-2. Parcel F11-206-2 is designated an R-4 zone by the City of New London. The distance from the nearest edge of the BESF fence to the property line of Parcel F11-206-2 is approximately 330-feet. The distance from the nearest edge of the BESF battery container to the property line of Parcel F11-206-2 is approximately 340-feet.

Proposed Facility and Associated Equipment

10. Referencing Motion to Reopen, Site Plan E.100, the overhead interconnection line crosses over the BESF compound.
 - a. what is the clearance between the overhead line and compound fence and tallest portion of the BESF.

The Connecticut Light and Power Company d/b/a Eversource Energy (“Eversource”) has provided HQCA with new information concerning the Point of Interconnection (POI). The existing vault is no longer the designated POI. Per Eversource, (N) New Customer Riser Pole #1 is the current intended POI. As a result, (N) Customer Riser Pole #5 will most likely not need to be located on the western half of the host parcel. HQCA will be proposing to Eversource to locate the customer meter pole (“Customer Meter Pole” formerly (N) Customer Riser Pole #5) on the east portion of the host parcel, outside the east / southeast perimeter of the HQCA BESF compound. As a result, the currently depicted westbound, and the returning eastbound interconnection paths are most likely no longer needed. HQCA will be proposing to Eversource to originate an underground interconnection path from the switchboard located in the southwest corner of the BESF compound to run south to a point outside the perimeter of the HQCA BESF compound perimeter. Once outside the southern perimeter of the HQCA BESF compound, HQCA will be proposing the interconnection path head east underground (unless Eversource requires an overhead interconnection line) to the Customer Meter Pole. From the Customer Meter Pole, the interconnection path would then run north via new utility poles towards the newly designated POI (N) New Customer Riser Pole #1. If the new location of the POI allows the number of new poles needed to be reduced, HQCA will pursue that opportunity with Eversource. If any part of the proposed interconnection path is required by Eversource to be overhead, as opposed to underground, that interconnection line will not run over or near any battery units or transformers located within the BESF compound and will have 12-feet of clearance

from the top of the 8-foot HQCA BESF compound fence. The External Flame Detection System will be located within the HQCA BESF compound but will not be located near the proposed interconnection line within the HQCA BESF compound. HQCA's proposed interconnection design is subject to Eversource final review and approval.

Pursuant to Regulations of Connecticut State Agencies § 16-50j-60, a partial Development and Management Plan detailing an updated and Eversource-approved interconnection design would be presented to the Connecticut Siting Council ("Council") for Council review and approval prior to the commencement of construction of the HQCA BESF.

b. does this design conform to applicable fire and BESF safety codes?

Please see Petitioner's response to Interrogatory 10.a above. The final interconnection design approved by Eversource will conform to all applicable fire and BESF safety codes.

c. what safety concerns are there in the event of an overhead line failure above the BESF?

Please see Petitioner's response to Interrogatory 10.a above.

d. if there was a battery fire, would the line pose a safety hazard to emergency responders?

Please see Petitioner's response to Interrogatory 10.a above.

e. can the overhead interconnection be realigned to avoid crossing the BESF compound?

Please see Petitioner's response to Interrogatory 10.a above. While the interconnection path HQCA will be proposing to Eversource is changing based on new information provided by Eversource, HQCA will be proposing an underground interconnection path from the switchboard located in the southwest corner of the BESF compound to run south to a point outside the perimeter of the HQCA BESF compound perimeter. That said, most BESF interconnection paths must originate from a BESF compound and thus cross the BESF compound to some extent. If any part of the new proposed interconnection path is required by Eversource to be overhead, as opposed to underground, that interconnection line will not run over or near any battery units or transformers located within the BESF compound and will have 12-feet of clearance from the top of the 8-foot HQCA BESF compound fence. HQCA's proposed interconnection design is subject to Eversource final review and approval.

11. What is the reason a customer meter pole is in the western portion of the property?
Can an underground line be routed from the vault to a point east of the BESF, then transition to overhead for the customer meter pole?

Please see Petitioner's response to Interrogatory 10.a above. It is Petitioner's intention, subject to Eversource review and approval, that the Customer Meter Pole be placed to the east / southeast of the eastern exterior of the HQCA BESF compound. It is also Petitioner's intention that the interconnection line run underground from the southwest corner of the BESF compound and run south to a point outside the perimeter of the HQCA BESF compound perimeter. Once outside the southern perimeter of the HQCA BESF compound, HQCA will be proposing the interconnection path head east underground (unless Eversource requires an overhead interconnection line) to the Customer Meter Pole. From the Customer Meter Pole, the interconnection path would then run north via new utility poles towards the newly designated POI (N) New Customer Riser Pole #1. HQCA's proposed interconnection design is subject to Eversource final review and approval.

12. Submit a Megapack 2XL Safety Overview specification sheet, if available.

Please find the Megapack 2XL Safety Overview specification sheet attached as Attachment D.

13. Referencing Motion to Reopen Addendum, p. 2, provide detailed information regarding the application of the non-combustible coating to the facility compound.

Petitioner has proposed that gravel cover all interior ground portions located within the HQCA BESF compound fence that are not occupied by concrete pads. In addition, although not required by National Fire Protection Association ("NFPA") 855, a 3-foot wide strip of gravel is also proposed around the exterior perimeter of the HQCA BESF compound fence.

Public Health and Safety

14. Does the Tesla Megapack 2 XL have any external or internal active fire suppression systems (standard or optional) to mitigate cascading thermal runaway, such as aerosol or water-based systems?

The MP2XL does not have an internal fire suppression system or one that is integral to its design / construction. UL540A unit level test results demonstrate that a suppression system is not required to stop the spread of fire from cell to cell, module to module, or MP2XL cabinet to cabinet.

In line with current industry guidance, HQCA and its fire response organization partner, Fire & Risk Alliance, strongly recommend a containment strategy until any fire is exhausted. Response recommendations to a thermal runaway event include avoiding applying water or any other agent directly to the exterior of an affected battery unit as this provides little benefit for fire response and may result in undesired run-off.