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September 9, 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. 1-9.a; 15-16 to Petitioner issued on August 19, 2025**

Dear Attorney Bachman:

I am writing on behalf of my client Hanwha Q CELLS America Inc. ("HQCA"). HQCA respectfully submits herewith its responses to Council Interrogatory Nos. 1-9.a; 15-16 to Petitioner issued on August 19, 2025.

Please note that the responses to Interrogatory No. 5, labeled as Confidential Attachment 1, Interrogatory No. 6, labeled as Confidential Attachment 2, and Interrogatory No. 7, labeled as Confidential Attachment 3, contain confidential, commercial, financial, and proprietary information of a similar nature for which a Protective Order was issued in reopened Petition No. 1607 on April 12, 2024. Accordingly, HQCA hereby requests that Confidential Attachment Nos. 1, 2, and 3 to these interrogatory responses be subject to the same Protective Order.

Please find enclosed the original and fifteen copies of Petitioner's responses to Interrogatory Nos. 1-9.a; and 15-16 and corresponding Attachments A, B, and C. Confidential responses to Interrogatory Nos. 5, 6, and 7 are being sent separately.

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,

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 Interrogatories 1-9.a; 15; 16

September 9, 2025

Notice

1. Has Hanwha Qcells America, Inc. (HQC) received any comments since the Motion to Reopen was submitted to the Council? If yes, summarize the comments and how they were addressed.

   Hanwha Q CELLS America Inc. ("HQCA") is in receipt of one item of correspondence since the Motion to Reopen was submitted to the Council. It is a letter from the City of New London (the "City") dated August 22, 2025 expressing the City's "full support" for the battery energy storage system ("BESS") proposed in Petition No. 1607A.

2. Petition 1607 Exhibit I included a chart describing outreach to the City of New London up to November 22, 2023. Provide a revised chart to date.

   HQCA has continued its outreach to the City of New London. Please see Attachment A for an updated chart describing outreach to the City of New London by HQCA to date.

3. Referencing Motion to Reopen Addendum p. 28 and Exhibit 3, the City of New London letter is dated July 5, 2023. Has the City provided HQC an updated letter? If yes, please provide.

   The City provided the Council and HQCA with an updated letter, dated August 22, 2025, reaffirming the City of New London's "full support" for the approval of the BESS proposed by HQCA ("HQCA BESF") in Petition No. 1607A. A copy of the City's August 22, 2025 letter is attached hereto as Attachment B.

Public Benefit

4. Please respond to the following related to public benefit:

   a. Would the proposed facility be necessary for the reliability of the electric power supply of the state? Explain why or why not.

   Connecticut disproportionately relies on natural gas for its electricity needs. In 2023, natural gas accounted for approximately 60% of the state's total electricity net generation. This overreliance has more than doubled since 2010. To make matters worse, Connecticut imports 100% of the natural gas it relies on for electricity. (See U.S. Energy Information Administration, Independent Statistics and Analysis, Connecticut Profile Analysis, Dec. 19, 2024):

https://www.eia.gov/state/analysis.php?sid=CT#:~:text=In%202023%2C%20natural%20gas%20fueled,largest%20share%20of%20any%20state).

This over-dependence on 100% imported natural gas increases the likelihood of supply disruptions of natural gas to Connecticut power plants which then convert that natural gas into electricity. This over-dependence also subjects Connecticut electric ratepayers to increased electricity prices any time natural gas prices spike due to high demand, as is the case most winters in Connecticut since Connecticut homes, businesses, and institutions over-rely on natural gas not only for electricity generation, but for cooking and heating as well.

The HQCA BESF will help improve reliability, especially during these periods of high demand because the HQCA BESF will continuously respond to electric market needs. For example, the HQCA BESF will help improve reliability since BESS facilities like the HQCA BESF can dispatch stored electricity instantly to the grid as opposed to the grid having to rely on the importation of additional fossil fuels or peaker generator fuels to create new electricity in high demand periods.

The HQCA BESF is an energy *storage* system and not an energy *generation* system and, as a result, it does not have typical ramp rates as compared to various forms of conventional electricity generation. The HQCA BESF is capable of adjusting from a full 4.896 MW charge to 4.896 MW discharge in less than 1 second. The HQCA BESF units will be dispatched simultaneously and can operate at any value between 4.896 MW charge and 4.896 MW discharge. This flexibility allows the HQCA BESF to help make the best use of any excess clean, renewable energy produced from other sources such as solar or wind and delivered to the grid, while at the same time improving electric power supply reliability.

As Connecticut focuses on lowering its dependence on the importation of natural gas, BESS facilities like the HQCA BESF will fill a pivotal role in supporting and improving electric power supply reliability.

b. Would the proposed facility be necessary for the development of a competitive market for electricity? Explain why or why not.

The Connecticut General Assembly (the "General Assembly") established objectives for the State's energy storage policy in Public Act No. 21-53, "An Act Concerning Energy Storage". Those objectives are as follows:

(1) providing positive net present value to all ratepayers, or a subset of ratepayers paying for the benefits that accrue to that subset of ratepayers;

(2) providing multiple types of benefits to the electric grid, including, but not limited to, customer, local, or community resilience, ancillary services, leveling out peaks in electricity use or that support the deployment of other distributed energy resources;

(3) fostering the sustained, orderly development of a state-based electric energy storage industry; and

(4) maximizing the value from the participation of energy storage systems in capacity markets.

Public Act 22-53 directed the Connecticut Public Utilities Regulatory Authority ("PURA") to initiate a proceeding to develop and implement a program for energy storage systems connected to the distribution system in front of the meter and not located at a customer premises.

Public Act 21-53 also established goals in order to quantify the progress of energy storage development in the state as follows:

(1) Three hundred megawatts by December 31, 2024;

(2) Six hundred fifty megawatts by December 31, 2027; and

(3) One thousand megawatts by December 31, 2030.

HQCA is developing the HQCA BESF in New London in direct response to the General Assembly's objectives, including the key objective of maximizing the value to ratepayers through the participation of energy storage systems in capacity markets. In particular, the HQCA BESF will play a vital role in helping to build a competitive electric marketplace in Connecticut. In line with bedrock economic principles, an increase in participants in the Connecticut electric marketplace will increase competition in that electric marketplace and will help lower electric rates for Connecticut ratepayers as well as, in the case of BESS facilities like the HQCA BESF, improve resiliency and reliability. For example, the ability of a BESS to dispatch electricity into the wholesale marketplace during high demand hours at a cheaper price than the cost of procuring new fuel for fossil fuel or gas peaker generators will help lower electricity prices in Connecticut. Facilities like the HQCA BESF can help improve resiliency and reliability since these BESS facilities can dispatch stored electricity instantly to the local grid as opposed to the grid having to rely on the importation of additional fuels to supply and transport more electricity to the local grid in high demand periods.

c. Would the proposed facility contribute to the forecasted generating capacity requirements? Explain why or why not.

The HQCA BESF will help meet installed capacity requirements because the HQCA BESF will dispatch stored electricity instantly to the local grid as opposed to having to factor in additional capacity in the form of new fuels to supply and transport new electricity to the local grid in high demand periods. In doing so, the production of new electricity is avoided that would otherwise be necessary, which would have to be added by ISO-NE as additional capacity to its installed capacity requirement.

The HQCA BESF will operate as a stand-alone energy storage system that will participate in wholesale energy, capacity, and frequency regulation markets. HQCA will participate in available energy markets, as applicable. HQCA also expects to participate in future procurements for BESS resources and to participate in ISO-NE's Forward Capacity Market (FCM). HQCA would seek to secure a Capacity Supply Obligation, committing to provide dispatchable capacity during periods of high demand or grid stress. This directly helps meet the region's Installed Capacity Requirement. BESS resources are increasingly clearing auctions to support growing demand, and participation by this HQCA BESF would play an important role in ISO-NE's capacity planning.

The HQCA BESF will also help achieve the General Assembly's goals for battery storage deployment as articulated in Public Act 21-53. Public Act 21-53 established goals in order to quantify the progress of energy storage development in the state as follows:

Three hundred megawatts by December 31, 2024;

Six hundred fifty megawatts by December 31, 2027; and

One thousand megawatts by December 31, 2030.

d. Would the proposed facility reduce dependence on imported energy resources? Explain why or why not.

As stated, Connecticut disproportionately relies on natural gas for its electricity needs. In 2023, natural gas accounted for approximately 60% of the state's total electricity net generation. This overreliance has more than doubled since 2010. To make matters worse, Connecticut imports 100% of the natural gas it relies on for electricity.

The HQCA BESF will help reduce Connecticut's over dependence on natural gas because the HQCA BESF can dispatch stored electricity from clean, renewable sources such as solar and wind instantly to the grid as opposed to the grid system having to import fossil fuels or peaker generator fuels to create new electricity in high demand periods. Existing and planned regional solar and wind projects include the solar projects in East Lyme, North Stonington, Stonington and any wind projects which are designed to deliver electricity to Connecticut. This allows the HQCA BESF to help make the best use of any excess clean, renewable energy produced locally, thereby reducing the state's dependence on imported energy resources.

e. Would the proposed facility diversify the state's energy supply mix? Explain why or why not.

The HQCA BESF is a proposed standalone battery energy storage system which will help diversify the state's energy supply mix by helping to maximize the energy generated by a myriad number of power supply sources. For example, if a particular power supply source is generating and distributing energy to the grid during periods of oversupply, the HQCA BESF can store that energy until that energy is needed in a high demand period. This adds

flexibility to the grid and helps to ensure energy produced by any myriad of sources are not wasted.

f. Would the proposed facility enhance reliability? Explain why or why not.

The HQCA BESF will help improve and enhance reliability of the general electric power supply as well as of the local grid, especially during periods of high demand because the HQCA BESF will continuously respond to electric market needs. For example, the HQCA BESF will help improve reliability because it can dispatch stored electricity instantly to the grid as opposed to the grid having to import additional natural gas, fossil fuels, or peaker generator fuels to create new electricity in high demand periods. As discussed in Petitioner's response to Interrogatory 4.a., this flexibility allows the HQCA BESF to help make the best use of any excess clean, renewable energy produced from other sources such as solar or wind while at the same time improving and enhancing reliability.

g. Would the proposed facility provide winter reliability benefits for the grid in the event that natural gas supplies are curtailed and/or backup oil supplies are limited for natural gas-fired power plants in the region?

Yes, the HQCA BESF will help provide increased reliability in the likely event that natural gas supplies are curtailed and/or backup oil supplies are limited, particularly during cold weather periods. As discussed above in Petitioner's response to Interrogatory 4.a., Connecticut disproportionately relies on natural gas for its electricity, cooking, and heating needs. Connecticut imports 100% of the natural gas it relies on for electricity. This over-dependence increases the likelihood of supply disruptions of natural gas to Connecticut power plants. This over-dependence also subjects Connecticut electric ratepayers to increased electricity prices any time natural gas prices spike due to high demand, as is the case most winters in Connecticut due to Connecticut's homes', businesses', and institutions' over-dependence on natural gas for electricity generation as well as for cooking and heating.

The HQCA BESF will help improve winter reliability, especially during these periods of high demand because the HQCA BESF will continuously respond to electric market needs. For example, the HQCA BESF will help improve reliability since these storage facilities can dispatch stored electricity instantly to the grid as opposed to grid having to import expensive fossil fuels or peaker generator fuels to create new electricity in high demand periods like winter.

Project Development

5. Has the estimated cost of the project changed since the Council's final decision was rendered in Petition 1607?

The estimated cost of the project has changed. The estimated cost of the project is confidential, commercial, financial, and proprietary information which was previously provided under a Protective Order dated April 12, 2024 in the now reopened Petition No.

1607. Similarly, the current estimated cost of the project is being provided as Confidential Attachment 1. HQCA hereby requests that Confidential Attachment 1 to these interrogatory responses be subject to the same Protective Order.

Proposed Site

6. Pursuant to CGS §16-50o, submit a copy of the lease for the proposed facility site. Any confidential/proprietary information, such as financial terms, may be redacted.

Confidential Attachment 2, namely, the Option and Energy Storage Lease and Easement Agreement contains confidential, commercial, financial, and proprietary information of a similar nature for which a Protective Order was issued in reopened Petition No. 1607 on April 12, 2024. Accordingly, HQCA hereby requests that Confidential Attachment 2 to these interrogatory responses be subject to the same Protective Order.

7. What is the length of the lease agreement with the host parcel owner? Describe options for a lease extension, if any.

The length of the Energy Storage Lease and Easement Agreement and options for an extension of the Energy Storage Lease and Easement Agreement are confidential, commercial, financial, and proprietary information of a similar nature for which a Protective Order was issued in reopened Petition No. 1607 on April 12, 2024. Accordingly, HQCA hereby requests that Confidential Attachment 3 to these interrogatory responses be subject to the same Protective Order.

8. Is the site located within an Environmental Justice Community?

The HQCA BESF is proposed to be located in New London which is an Environmental Justice Community. The HQCA BESF is not an affecting facility because it is not an energy generating facility, but rather it is an energy storage facility, capable of storing up to 4.896 MW of electricity. Indeed, the HQCA BESF will not emit any harmful emissions during operation and will help facilitate the introduction of clean, renewable energy into the local electricity supply. This is an objective codified in the Connecticut General Statutes wherein the Connecticut General Assembly prioritized "energy…conservation, energy efficiency and the development and utilization of renewable sources of energy." (See Conn. Gen. Stat. §16a-35k). The HQCA BESF will accomplish this objective by saving energy produced by various energy sources, including clean, renewable sources of energy, especially during high-generation timeframes, like when the wind or sun are especially strong and consistent. Without the HQCA BESF, that clean, renewable energy may go unused and wasted.

Moreover, Connecticut has prioritized the delivery of improved resilience to Environmental Justice Communities. The HQCA BESF will deliver improved resilience to New London ratepayers by continuously responding to electric market needs. For example, the HQCA BESF will help improve resilience and reliability since these storage facilities can dispatch stored electricity instantly to the grid as opposed to the grid system having to

import additional fossil fuels or peaker generator fuels to create new electricity in high demand periods.

9. Please provide the following:

a. distance of the nearest edge of the BESF fence and battery container to the abutting parcel to the north (owned by the host parcel owner)?

The distance from the nearest edge of the HQCA BESF fence to the parcel to the north, which is owned by the host parcel owner, is 4-feet, 10-inches.

The distance from the nearest edge of the nearest battery container to the parcel to the north, which is owned by the host parcel owner, is 12-feet.

15. The DEEP Natural Diversity Data Base Determination letter for the Project expired on May 17, 2025. Has HQC filed a request for an updated review?

HQCA has conducted a new CT DEEP Natural Diversity Data Base Determination review and received a Natural Diversity Data Base Determination letter dated September 3, 2025. Please see a copy of same attached as Attachment C. The September 3, 2025 CT DEEP Natural Diversity Data Base Determination letter contains the same Best Management Practices for the Peregrine falcon as did the previous CT DEEP Natural Diversity Data Base Determination letter.

16. Once operational, how many routine maintenance inspections would occur per year? Would the BESF be out of service for these inspections, and if so, for what duration?

One inspection is performed annually during years 1-4 and years 6-9. Two inspections are performed during year 5 and year 10. Each BESF unit is powered down for inspection for approximately six hours. If a particular unit requires specific maintenance, that particular unit is powered down until the maintenance is performed.