



VIA ELECTRONIC MAIL AND U.S. MAIL

June 14, 2024

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

RE: **PETITION NO. 1620** – VFS, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 920-kilowatt customer-side fuel cell facility and associated equipment to be located at the York Correctional Institution, 199 West Main Street, East Lyme (Niantic), Connecticut. **Council Interrogatories to Petitioner.**

Dear Ms. Bachman,

I am writing on behalf of VFS, LLC in connection with the above-referenced Petition. With this letter, I am enclosing the original and fifteen copies of the Responses to the Interrogatories issued to VFS, LLC by the Council on June 4, 2024.

Please contact me at your earliest convenience if you have any questions concerning this submittal. Should any VFS interrogatory response be unclear or insufficient, please contact me as soon as possible so that I can provide an immediate response.

Sincerely,

Steven Pearson

STEVE PEARSON

Green Energy Customer Financing Executive

248-657-4600 ext. 105

spearson@vfsmi.com

Petition No. 1620
VFS, LLC
York Correctional Institute
199 West Main Street
East Lyme, Connecticut

Interrogatories
June 4, 2024

Notice

1. Referencing Petition p. 14, provide details of consultation with municipal officials including personnel contacted, dates of contact, and municipal comments and how the comments were addressed. **VFS has been in continuous communication with York Correctional Institution officials Tom Levesque and Mike Lettieri over the last 6 months regarding the Fuel Cell Project.**
2. Has VFS received any comments since the petition was submitted to the Council? If so, summarize the comments and state how these comments were addressed. **No new comments have been received since the petition was submitted to the CT Siting Council.**

Project Development

3. What is the estimated cost of the proposed project? **\$6,700,000 project cost.**
4. Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any contract or grant? If so, did VFS complete the environmental impact evaluation process for state agency actions under the Connecticut Environmental Policy Act? If so, did CEQ, DEEP and OPM provide comments on the project as part of this process? Please summarize the comments. **No state funds are being used to construct the project.**
5. Referencing Petition p. 14, the facility was selected as part of the LREC program. Was the facility selected as part of the Non-Residential Renewable Energy Solutions (NRES) Program, which is the successor to the LREC program as of June 30, 2021? When was the project selected? What is the duration of the contract? **Contract is LREC9-6898 YCI_FUEL_CELL. The project was selected on October 21, 2020. The LREC contract duration is 13 years. LREC9-6898 is not part of the NRES program.**

Proposed Site

6. What is the name and use of the building on the host parcel adjacent to the proposed site? **Building 10, Central Plant and Warehouse.**
7. What is the length and width of the proposed driveway? **The proposed asphalt driveway is 10' wide and approximately 100' in length from the street, as displayed in the ICDS GA Scale Drawing.**
8. Referencing Petition p. 8, the nearest residence is listed as over 900 feet to the east whereas Petition Attachment 9 states there are apartments 172 meters to the southeast.
 - a. What is the distance and direction of the nearest residential property line from the proposed fuel cell facility? **247' to the South**
 - b. What is the distance and direction of the nearest residential building from the proposed fuel cell facility? **492' to the Southeast**

Proposed Facility and Associated Equipment

9. Referencing Petition p. 3, the proposed facility is described as a combined heat and power installation.
 - a. Is use of the waste heat required by the contract? When will it be used? **The waste heat is not a requirement of the contract but is offered to the DOC at no additional cost. The use of the waste heat will be constant and is not seasonal.**
 - b. Where and how would the waste heat be used? **Waste heat will be utilized to preheat the boiler return and will offset a significant amount of natural gas usage in the prison facility.**
 - c. Would the equipment necessary to utilize waste heat be installed at the time of fuel cell installation or at a later date? **The heating equipment will be installed at the time of facility construction.**
10. Referencing Petition Attachment 5, several buildings are located on the property; specify where the generated power and waste heat would be used. **All connections will be made in Building 10 which houses electrical switch gear , boilers, chillers, and warehouse space. Building 10 is directly adjacent to the fuel cell facility.**
11. Would the proposed fuel cell be able to provide backup emergency power for any structures on the host property in the event of a power outage? **No. The fuel cell facility is currently designed to operate in parallel with the grid.**

Energy Output

12. Referencing Petition p. 3, provide the percentage of the overall correctional facility baseload that would be supplied by the facility. **The facility will provide Approximately 90% of the baseload energy to the prison.**
13. Referencing Petition p. 3, does the 94% maximum total efficiency include the utilization of waste heat? **Yes**
14. Does the correctional facility have its own power generator or is power obtained from a connection to the local distribution grid? **The facility is connected to the grid.**
15. Would the proposed facility be able to supply power to the local distribution grid if all or a portion of generated power is not used by the correctional facility? **Yes**

Electrical Interconnection

16. Is the project interconnection required to be reviewed by ISO-NE? **NO**
17. Does VFS have an interconnection agreement with Eversource? If yes, when was it finalized? If not, when is the anticipated completion date? **VFS expects final approval by Eversource within 60 days.**
18. What is the distance from the facility to the electrical, water and gas utility interconnection points? **75'+-**
19. Referencing Site Plan GA1.0, provide a code key for items that are abbreviated (e.g. DCW, HX, ...)? **DCW – domestic cold water, FC-HWS – fuel cell hot water supply, FC-HWR – fuel cell hot water return, HX – heat exchanger, P-FC – fuel cell plumbing connection point (not yet defined), P-BLDG – Building plumbing connection point (not yet defined).**

Public Health and Safety

20. Would the project comply with the current Connecticut State Building Code, National Electrical Code and Connecticut State Fire Prevention Code? **Yes**
21. Site Plan Sheet E.1, indicates nitrogen tanks would be stored on site. What would the nitrogen be used for and what is the frequency of use? Are the canisters explosive if exposed to fire? **The nitrogen is used as part of a safety system. When the fuel cells go into an emergency shutdown state the fuel processing sections of the enclosure are purged with nitrogen to dilute the small amount of hydrogen present to nonflammable levels. Nitrogen is an inert gas and is not explosive.**

22. Referencing Petition p. 4, it states HyAxiom service personnel would be alerted in the event of a fuel cell shutdown. Would HyAxiom personnel be dispatched to the facility in the event of a fire or other emergency? Would emergency responders have to wait for HyAxiom personnel to arrive before taking emergency action? **Service personnel would be dispatched in the event of any emergency including a fire. First responders will have the ability to shutdown the fuel cells and to shut off natural gas flow to the facility without entering the fenced area prior to the arrival of HyAxiom Service personnel. VFS through HyAxiom will offer all local first responders and prison facility personnel safety training for the facility once completed.**
23. Would the construction or operation of the proposed facility impact or interfere with any existing utilities or infrastructure within the surrounding area? If so, identify any measures that would be employed to protect existing utilities or infrastructure from impact or interference. **There will be no interference with existing utilities or infrastructure because of the facility construction or operation.**
24. Would lighting be installed at the facility? If so, for what purpose and what type would be installed (e.g motion activated, preset timer...)? **LED lighting will be employed at the facility to allow service personnel to operate in nighttime hours. The lighting circuit will be switched and is not anticipated to be run constantly.**
25. Referencing Petition p. 8, it states the nearest airport is over 20 miles away. Identify this airport. **This reference was made in error. Groton-New London airport is closest to the site at 9.6 miles.**
26. What is the distance from the proposed facility to the New London-Groton Airport? **9.6 miles**
27. What is the distance from the proposed facility to the nearest heliport? **9.6 miles**
28. Would a crane be required for construction? If yes, to what height would the crane boom be extended? Would notice to the Federal Aviation Administration be required for the temporary use of a crane? **A crane will be utilized during the construction of the facility. The boom height will be Approx. 150'. Pursuant to 14CFR 77.9 no notice to the FAA is required.**
29. Referencing Petition Attachment 9- Noise Analysis p. 11, it states noise could be reduced to apartments to the east by rearranging the two fuel cell units so that the power modules block the sound cooling module emitting to the easterly direction. Explain. **ATI the acoustical engineer is pointing out that the noise to the East could be reduced by using the fuel cell modules to block noise from the cooling modules. It is important to point out that the facility as presently designed complies with all local and state regulations. Reference Page 20 of the ATI report.**

Environmental Effects and Mitigation Measures

30. What is the type and quantity of insulating oil within the proposed transformers? Will the transformers have secondary containment and/or a low-level oil alarm? Would the oil be bio-degradable? **The selected transformer contains 450 gallons of mineral oil which is not biodegradable. There is no low-level oil alarm or secondary containment. The transformer will be removed from the site after the fuel cells are no longer in service (20 years).**
31. Referencing Petition Attachment 16, during overhaul of the desulfurizer, how is it removed, transported, stored and disposed? Are any components reused for other products or purposes? **The desulphurizer is disconnected and capped mechanically and then removed from the enclosure. It is then transported to a facility where the contents are recycled/repurposed, and the vessel is transported back to the factory for reuse.**
32. Would construction comply with the Connecticut Soil Erosion and Sediment Control Guidelines, effective March 30, 2024? **Yes. The construction will comply with the guidelines effective March 30, 2024. Although the site disturbance will be very small the site will have sedimentation controls designed by a qualified professional.**
33. Are any permanent stormwater management controls or measures proposed? If yes, provide detail. **No permanent controls are not anticipated in the final design.**

34. Is any portion of the proposed facility site on prime farmland soils? If so, what is the area of prime farmland soils that would be impacted by development of the project? **No portion of the proposed facility will be on prime farmlands.**

Facility Construction

35. Since the proposed site is located at a restricted access correctional institution, what security measures are proposed for construction? **ALL construction personnel entering the site will be required to undergo a full background check performed by the Dept. of Corrections. All personnel will comply with all security protocols at all times.**