



VIA ELECTRONIC MAIL AND HAND DELIVERY OF COPIES

July 5, 2024

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

RE: **PETITION NO. 1621** – 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 grid-side 4.0-megawatt fuel cell facility and associated equipment to be located at 1225 Central Avenue, Bridgeport, Connecticut, and associated electrical interconnection. **Council Interrogatories to Petitioner.**

Dear Ms. Bachman,

I am writing on behalf of VFS, LLC in connection with the above-referenced Petition. In addition to this email letter, VFS will hand deliver the original and fifteen copies of the Responses to the Interrogatories issued to VFS, LLC by the Council on July 5, 2024.

Should you have any questions concerning this submittal, please contact me at your earliest convenience. If any of the VFS responses to the interrogatories be unclear or insufficient, please contact me as soon as possible so that I can provide an immediate response.

Sincerely,

Steven Pearson

STEVEN PEARSON
Green Energy Customer Financing Executive
248-657-4600 ext. 105
spearson@vfsmi.com



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

June 18, 2024

Steve Pearson
VFS, LLC
5827 Terex
Clarkstown, MI 48346
spearson@vfsmi.com

RE: **PETITION NO. 1621** – 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 grid-side 4.0-megawatt fuel cell facility and associated equipment to be located at 1225 Central Avenue, Bridgeport, Connecticut, and associated electrical interconnection. **Council Interrogatories to Petitioner.**

Dear Steve Pearson:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 9, 2024. 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 July 9, 2024, 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

MAB/IN/dll

Enclosure: Revised Schedule dated June 18, 2024
c: Service List dated March 14, 2024

**Petition No. 1621
VFS LLC
1225 Central Avenue
Bridgeport, Connecticut**

**Interrogatories
June 18, 2024**

Notice

1. Referencing Petition p. 8 and Exhibits 9, 10 & 11, has VFS, LLC (VFS) met with municipal officials prior to the submission of the petition to the Council? If so, when were meetings held and what comments were received, if any? **VFS did not have any meetings with municipal officials**
2. Referencing Petition p. 8 and Exhibits 9, 10 & 11, has VFS received any comments from municipal officials and/or abutting property owners since the petition was submitted to the Council? If yes, summarize the comments and state how these comments were addressed. **None received.**
3. Referencing Petition Exhibit 8, the Notice Letter to Abutters and Officials references two 460-kW fuel cells and equipment proposed to be installed at 401 West Main Street, East Lyme, CT 06347. Provide proof of mailing to the abutters and officials of a corrected letter that references thirteen Bloom 325kW, 300kW, and 275kW fuel cells and equipment proposed to be installed at 1225 Central Avenue, Bridgeport. **See corrected letter #1 and proof of mailing attached #1a.**

Project Development

4. What is the estimated cost of the proposed project? **\$24,227,888**
5. 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?
No

Proposed Site

6. Submit a map clearly depicting the boundaries of the fuel cell facility site and the boundaries of the host parcel. Under Regulations of Connecticut State Agencies (RCSA) §16- 50j-2a (29), "Site" means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located. **See SK-S drawing attached #2.**
7. What is the distance and direction of the nearest residential use property line from the proposed fuel cell facility? Provide the address. **110 Williston Ave. is 292' South of the proposed facility.**
8. What is the distance and direction of the nearest residential use building from the proposed fuel cell facility? Provide the address. **110 Williston Ave. is 300' South of the proposed facility.**
9. Provide the distance and direction to the nearest building from the proposed fuel cell facility. What is the use of the building? **McBride Electrical Contractors' workshop and warehouse at 1225 Central Ave. is 100' South of the proposed facility.**
10. What is the length and width of the existing driveway? **See attached SK-S drawing #2.**

11. Petition p. 4 references a paved access and the adjacent parking area. Please provide a clear site plan showing the facility, the paved access and the adjacent parking area. **See SK-S drawing attached #2.**
12. What is the distance of the facility to the edge of Central Avenue? What is the distance to the sidewalk? **Refer to the attached SK-S drawing #2.**
13. Would the existing fence on the host parcel remain in place? **Yes**
14. Provide the total limits of disturbance area for the proposed fuel cell facility. **Total area of disturbance will be no greater than 10,000 sf.**

Proposed Facility and Associated Equipment

15. 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 facility will be directly connected to the grid.**
16. Provide a specification sheet for the proposed fuel cell unit(s). **See Data sheets #3.**
17. What is the operational life of the facility? **Twenty years**
18. Referencing Exhibit 1, sheet GA 1.0, provide details of the stone retaining wall. Is it proposed or existing? **The retaining wall shown is proposed and is expected to be a segmented block retaining wall no taller than 3'. Details of the wall construction will be fully developed in the final design drawings submitted for permit.**

Electrical Interconnection

19. Has an interconnection application been submitted? If so, what is the status? **The interconnection application has been made and is presently in "study" process with United Illuminating.**
20. Is the project interconnection required to be reviewed by ISO-NE? **United Illuminating has confirmed that no ISO-NE review is required.**
21. Referencing Petition Exhibit 1, sheet GA 1.0 describe the water interconnection point and its distance from the facility. **The water connection will be made at the McBride Electric Building Which is Approx. 343' from the connection point at the Facility. Shown in the attached SK-S drawing #2.**
22. Referencing Petition Exhibit 1, sheet GA 1.0 how many new utility poles would be installed as part of this project? Provide the height above grade of the proposed utility poles and their distance apart. **Two new utility poles are expected to be installed as part of this project. The height of the pole will match existing. The new poles are shown on the GA drawing submitted with the petition and on the SK-S drawing which is attached #2.**
23. Provide the line voltage of the proposed electrical interconnection. **13,800 volts. This is shown on the one-line electrical drawing submitted with the petition.**
24. Would the project interconnect to existing electric transmission, distribution or an adjacent substation? Would the project require any line or substation upgrades? If so, describe the nature of these upgrades. **The project will connect to the distribution system at 13,800 volts. No line or substation upgrades are expected to be required.**

25. Provide the respective distances of the gas and electrical interconnection points from the utility equipment concrete pad on the southeastern corner of the compound. **Please refer to the attached SK-S drawing.**
26. Referencing Petition p. 6, how much water is used for start-up? **Approximately 350 Gallons per Energy Server.**

Public Health and Safety

27. Please provide an Emergency Response Plan for the proposed facility in accordance with Public Act 11-101, An Act Adopting Certain Safety Recommendations of the Thomas Commission. Does the Petitioner intend to provide on-site training to local emergency responders, if requested? **The final emergency response plan is developed in concert with local first responders. A sample plan is attached for review #4.**
28. Would the project comply with the current Connecticut State Building Code, National Electrical Code and Connecticut State Fire Prevention Code? **The project will comply with all applicable codes including IBC as adopted by CT, NFPA 853, NEC as adopted by CT, and all relevant Mechanical codes.**
29. What security measures would be employed to protect the fuel cell units/components from vandalism or intrusion? **8' chain link fencing and video surveillance is being employed as security measures.**
30. Which National Fire Protection Association (NFPA) or other codes and standards apply to fuel cell construction, installation and/or modifications? **NFPA 853 governs installation of fuel cells. The fuel cells are manufactured with CSA certification.**
31. Referencing Petition Exhibit 7 -acoustics report- provide the estimated noise levels at the following locations:
 - a) The nearest property boundary; **480 Bunnel 64.3dBA at the property line.**
 - b) The nearest residential structure. **110 Williston Ave 23.4dBA at the first floor**
32. Would the construction or operation of the proposed facility impact or interfere with any existing utilities or infrastructure within the project area? If so, identify any measures that would be employed to protect existing utilities or infrastructure from impact or interference. **The installation of the facility will have no impact on existing infrastructure. Redundant protective electrical relays are being employed to assure that grid circuitry is not impacted by the operation of the fuel cells.**
33. What type of insulating oil is used within the transformer(s)? Is it biodegradable? Do the transformer(s) have a containment system in the event of an insulating oil leak? Would the transformer(s) have a low oil alarm? **Approximately 475 Gallons FR3 biodegradable fire-resistant oil will be used in each of the transformers. No containment or low level alarm is planned for the facility.**
34. 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 required to rig the equipment into place. The extended length of the boom is expected to be 130'. There is no requirement to notify the FAA regarding the use of the crane at this site.**
35. Would the operation of the fuel cell facility produce any type of vapor plume or cloud? If so, is there a potential for icing in colder temperatures and/or a potential to interfere with air navigation? If so for

both, are there any mitigation measures? **No plume is produced during the operation of the fuel cell facility.**

36. What is the distance from the proposed facility to the nearest airport? Identify this airport. **Sikorsky Memorial Airport is 2 miles to the Southeast of the Facility.**

Environmental Effects and Mitigation Measures

37. Provide the number of trees six inches in diameter or greater that would be removed for installation of the proposed facility. **No trees will be removed to construct the facility.**
38. Is the proposed site within the Coastal Boundary? Provide a map. **The site is not within the Coastal Boundary. See attached map #5.**
39. Is any portion of the proposed facility site on prime farmland soils? If so, what is the area of prime farmland soil that would be impacted by development of the project? **No. The site is in a well developed urban environment and contains no prime farmland soil.**
40. Would construction comply with the Connecticut Soil Erosion and Sediment Control Guidelines, effective March 30, 2024? **Yes.**
41. Describe the visibility of the proposed facility from the surrounding area. **The facility site is within a well-developed mixed use area. The facility will be surrounded by an 8' high chain link fence with privacy slats and will be visible from both Central Ave. and Bunnel St. The facilities appearance is not incongruent with the surrounding properties.**

Facility Construction

42. What are the expected typical work hours and days of the week that construction would occur? **Monday through Friday 7:00am to 5:00pm.**
43. Provide a decommissioning plan for the proposed facility. **See attached Decommissioning Plan #6.**



June 20, 2024

RE: Petition For a Declaratory Ruling That No Certificate of Environmental Compatibility and Public Need is Required (“Petition”) for the Installation of 13 Bloom Energy Servers comprising a 4MW Fuel Cell installation at 1225 Central Ave., Bridgeport, CT 06607.

Dear Recipient,

Pursuant to Section 16-50j-40 of the Connecticut Siting Council's (the "Council") Rules of Practice, we are notifying you that VFS, LLC. intends to file a petition for declaratory ruling with the Connecticut Siting Council (“Council”) on or about March 12, 2024. The petition will request the Council’s approval of the installation of thirteen Bloom Energy Server fuel cells and ancillary equipment in support of a 4 MW customer-side, distributed generation project at 1225 Central Ave., Bridgeport, CT 06607. The fuel cells will be powered by natural gas and generated electricity will be sent directly to the electric grid.

The proposed placement site is located on the Northeast corner of the site. The proposed new construction will be approximately 120’ long x 70’ wide and 10’ high.

If you have any questions regarding the proposed work, please contact any of the following:

VFS, LLC.

Steve Pearson
5827 Terex
Clarkston, MI 48346
248.657.4600
spearson@vfsmi.com

VFS, LLC

Gerry Conboy
5827 Terex
Clarkston, MI 48346
702.302.8869s
gconboy@vfsmi.com

Connecticut Siting Council

10 Franklin Square
New Britain, CT 06051
Tel: 860.827.2935



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Clarkstown, MI
48346**

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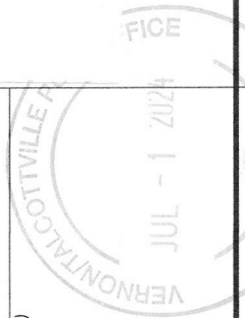


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2.	235 WILLISTON AVE LLC 105 COUNTRY RIDGE DRIVE RYE BROOK, NY 10573				
3.	GRAHAM MILDRED (LU) & CAMERON GRAHAM 1188-1190 CENTRAL AVE BRIDGEPORT, CT 06607				
4.	ARTIA MARTIN 12 ALICE PL TRUMBULL, CT 06611				
5.	NEW WAVE HOLDING LLC 168 WILLISTON #170 BRIDGEPORT, CT 06607				
6.	KEMP ELIZABETH 372 BUNNELL BRIDGEPORT, CT 06607				



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<p>1.</p>	<p>WC MCBRIDE REALTY MNGMENT LLC 398 BUNNELL ST BRIDGEPORT, CT 06607</p>	<p>Special Handling</p>
<p>2.</p>	<p>WC MCBRIDE REALTY MANAGEMENT LLC 400 BUNNELL ST BRIDGEPORT, CT 06607</p>	<p>Parcel Airlift</p>
<p>3.</p>	<p>NOGA LLC 11 GINGER CIRCLE FAIRFIELD, CT 06825</p>	
<p>4.</p>	<p>NANO CERAMICS LLC 440 BUNNELL ST BRIDGEPORT, CT 06607</p>	
<p>5.</p>	<p>SHARON HOLDINGS INC 222 SELLECK ST STAMFORD, CT 06902</p>	
<p>6.</p>	<p>Andre F. Baker Jr. State representative, District 124 Legislative Office Building, Room 5005 Hartford, CT 06106-1591</p>	



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Clarkstown, MI
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1. Herron Gaston
State Senator District S23
Legislative Office Building
Room 2000
Hartford, CT 06106-1591

2. Richard Blumenthal
US senator
945 LAFAYETTE BOULEVARD
SUITE 304
BRIDGEPORT, CT 06604

3. Christopher Murphy
US Senator
Cott Gateway
120 Hayslope Avenue, Suite 401
Hartford, CT 06106

4. Jim Himes
US Congressman
Fourth District
350 Fairfield Ave., Suite 603
Bridgeport, CT 06604

5. Comptroller Sean Scanlon
165 Capitol Avenue
Hartford CT 06106-0000

6. CT DEEP Katie Dykes
79 Elm Street
Hartford CT 06106-5427



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1. Federal DEP David Cash
1 Ashburton Place
Boston MA 02108

2. CT Historic Preservation Office
Jonathan Kinney
450 Columbus Boulevard Suite 5
Hartford CT 06103

3. Office of Policy and Management
Jeffrey Beckham
450 Capitol Ave
Hartford CT 06106

4. CT Attorney General William Tong
110 Sherman St Mackenzie Hall
Hartford CT 06105-000

5. Department of Public Health
Manisha Juthani, MD.
410 Capitol Ave
Hartford CT 06134

6. Council on Environmental Quality
Brenda Mallory, Chair
730 Jackson Place
Washington DC 20006



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2.	Department of Transportation Pete Buttigieg 1200 New Jersey Ave, SE Washington DC 20590				
3.	Department of Transportation Garrett T. Eucalitto 2800 Berlin Turnpike Newington CT 06111-0000				
4.	Dept of Emergency Services and Public Protection James Revello 287 West St Rocky Hill CT 06067				
5.	Dept. of Administrative Services and the Labor Dept. Dante Bartheleme Commissioner 200 Folly Brook Blvd Wethersfield CT 0610				
6.	CT Airport Authority Kevin Dittori CAA administrative offices. Bradley International Airport Terminal A 3rd Fl Admin Offices Windsor Locks CT				



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1.	Public Utilities Regulatory Authority Michael Caron 10 Franklin Square New Britain CT 06051				
2.	Joseph P. Ganim (D) Mayor of Bridgeport 999 Broad Street Bridgeport, CT, 06604				
3.	Lydia N. Martinez (D) Bridgeport City Clerk 45 Lyon Terrace Bridgeport, CT, 06604				
4.	Arben Kica City Building Official 45 Lyon Terrace Bridgeport, CT, 06604				
5.	Jon Urquidi City Engineer 45 Lyon Terrace Bridgeport, CT, 06604				
6.	Paul Boucher, Administrator City of Bridgeport Zoning 45 Lyon Terrace Bridgeport, CT, 06604				



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2.	Anjerice Miller City of Bridgeport, Senior HCD Manager 999 Broad Street Bridgeport, CT 06604				
3.	Sumit Sharma, MPH, MDiv Deputy Director of Public Health and Social Services 999 Broad Street Bridgeport, CT 06604				
4.	Council President Aidee Nieves 348 Park Street 06608 Bridgeport, CT, 06604				
5.	President Pro Tempore Ernest E. Newton, II 190 Read Street Bridgeport, CT, 06607				
6.	Majority Leader Amy Marie Vizzo-Paniccia 565 Goldenrod Avenue Bridgeport, CT, 06604				



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1.

Deputy Majority Leader: Jeanette Herron
202 Arlington Street
Bridgeport, CT, 06606

2.

Deputy Majority Leader Rolanda Smith
1099 Iranistan Avenue
Bridgeport, CT, 06604

3.

Deputy Majority Leader: Jorge Cruz
249 Black Rock Avenue Apt. 2-1
Bridgeport, CT, 06605

4.

Sergeant at Arms Richard Ortiz
9 Elm Court
Bridgeport, CT, 06606

5.

Councilman Aikeem G. Boyd
783 Garfield Avenue
Bridgeport, CT, 06606

6.

Councilman Scott Burns
29 Eames Boulevard
Bridgeport, CT, 06605



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1. Councilman Alfredo Castillo
1737 Noble Avenue
Bridgeport, CT, 06610

2. Councilman Frederick Hodges
195 Fairview Avenue
Bridgeport, CT, 06606

3. Councilwoman Michelle Lyons
91 Jewett Avenue
Bridgeport, CT, 06606


4. Councilman Tyler Mack
1115 Main Street, Unit 604
Bridgeport, CT, 06604

5. Councilwoman Mary A. McBride-Lee
125 Hillcrest Road
Bridgeport, CT, 06606

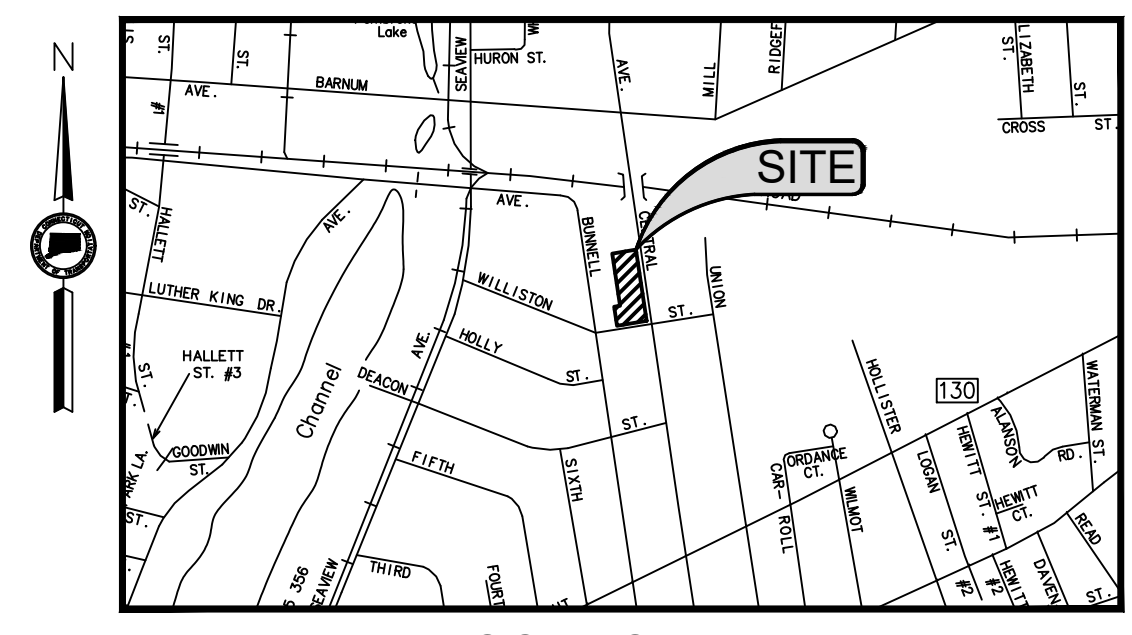
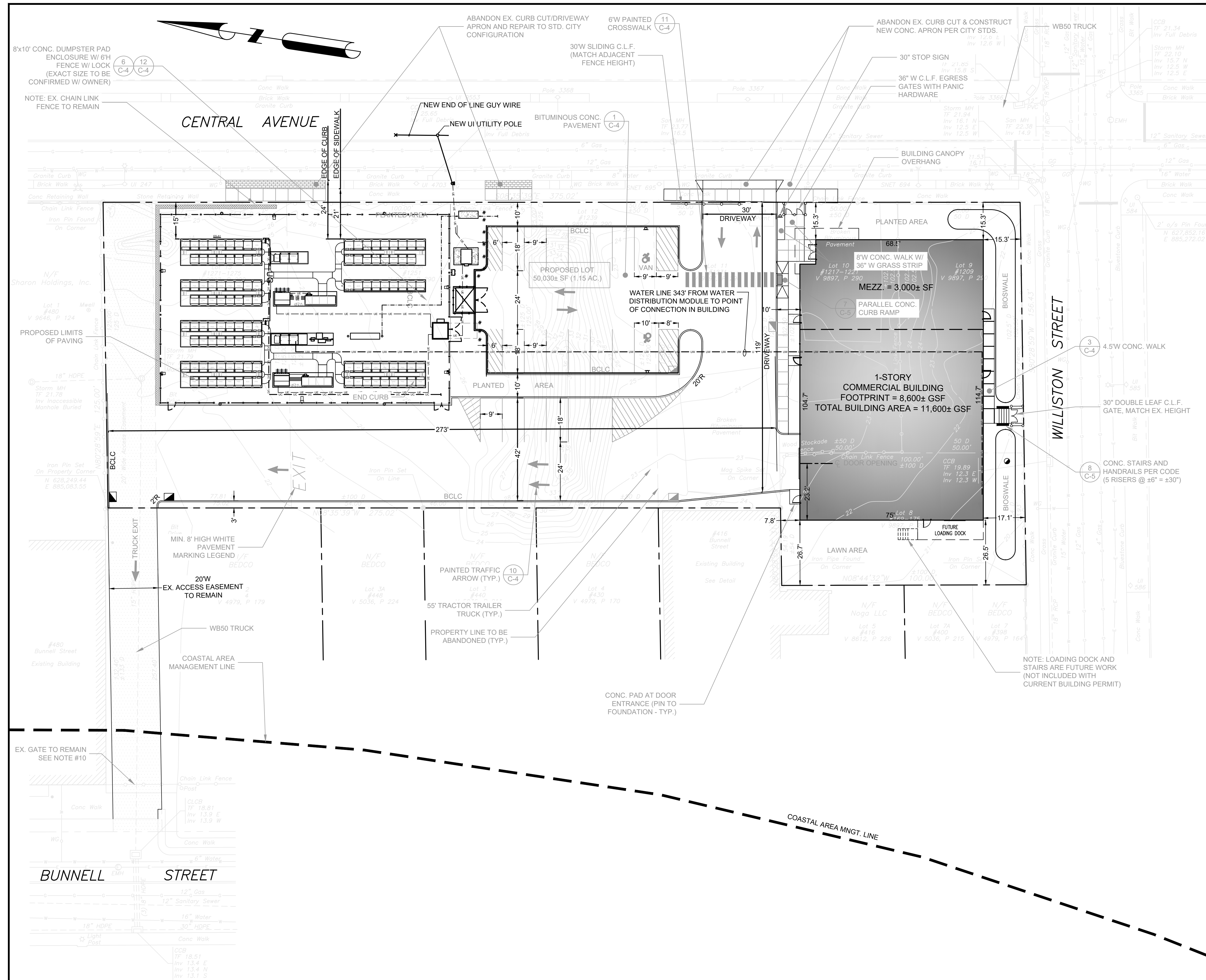
6. Councilman Matthew McCarthy
29 Harbor Avenue
Bridgeport, CT, 06605



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1.	Councilwoman Jazmarie Melendez 55 North Bishop Avenue Bridgeport, CT, 06610				
2.	Councilwoman Maria H. Pereira 80 Granfield Avenue A1 Bridgeport, CT, 06610				
3.	Councilwoman Rolanda Smith 1099 Iranistan Avenue Bridgeport, CT, 06604				
4.	Councilman Dasha T. Spell 284 Beechwood Avenue Bridgeport, CT, 06604				
5.	Councilwoman Maria I. Valle 561 Brooks Street Bridgeport, CT, 06608				
6.					

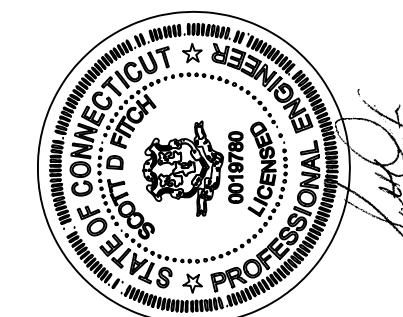
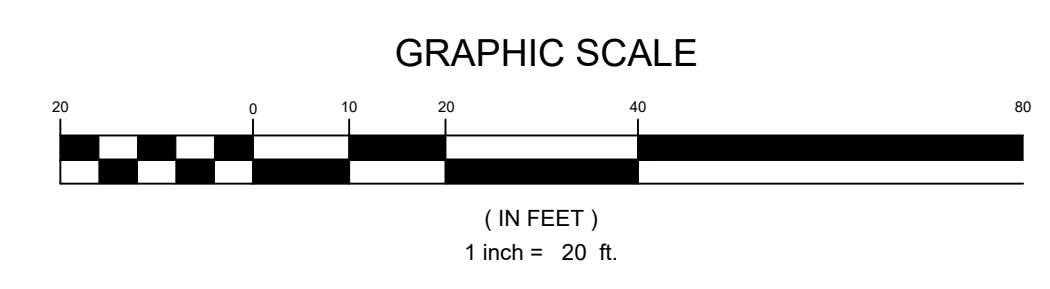


LOCATION MAP
SCALE: 1" = 1,000'

NOTE:
SITE PLAN INFORMATION REFERENCED IS TAKEN FROM CABEZAS DeANGELIS ENGINEERS & SURVEYORS SITE PLAN DRAWING C-2 REVISION 3 DATED 11/19/21

- LEGEND AND ABBREVIATIONS**
- — — — — PROPERTY LINE
 - 99 — — — — — CONTOUR (EX.)
 - x 99 — — — — — SPOT ELEV. (EX.)
 - 99 — — — — — CONTOUR (PROP.)
 - + 99 — — — — — SPOT ELEV. (PROP.)
 - V.I.F. VERIFY IN FIELD
 - TF TOP OF FRAME
 - INV. INVERT
 - HDPE HIGH DENSITY POLYETHYLENE
 - (5) PARKING COUNT

1 SITE PLAN
Scale: 1" = 20'



ICDS
Innovative Construction & Design Solutions, LLC
10 White Wood Lane
N. Brimley
0031453886
info@icdsllc.com

4 MW FUEL CELL POWER PLANT
1225 CENTRAL AVENUE, BRIDGEPORT CT 06607

SITE PLAN SKETCH

Project No.:	Drawn By:
Date:	Design By:
Scale:	Check By:

Drawing No. **SK-S**

0	07/02/24	0	Rev.	Date	Description
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Project No.:	Drawn By:
Date:	Design By:
Scale:	Check By:

The Bloom Energy Server® 6.5

Bloom Energy's solid oxide fuel cell (SOFC) platform provides a non-combustion pathway to convert fuels directly to electricity without combustion. The Energy Server is fuel-flexible and can generate energy using natural gas, blended hydrogen, biogas or hydrogen. A modular platform approach provides a pathway to upgrade existing systems to align with the sustainability goals of our customers over time. With no water consumption during normal operation and a high operational efficiency, the Bloom Energy Server significantly reduces greenhouse emissions today, while providing a pathway to operate with cleaner fuels in the future.

The Bloom Energy Server provides reliable and resilient power to facilities. It is designed in a modular concept ideal for on-site distributed power generation, operating 24x7, supporting the power demand in grid parallel or in a microgrid architecture. In addition, the heat from the flue gas can be captured from the Energy Server and integrated in a Combined Heat and Power (CHP) application.

Bloom Energy has over 1.2 GW of power generation installations deployed globally across six countries. The Energy Server is suitable to address power needs in any industry and has multi-megawatt installations across industries such as retail, datacenters, hospitals, sporting arenas, manufacturing and warehousing.



Clean

Our systems reduce criteria pollutants (NOx, SOx, and particulate matter) to near zero and has far lower carbon emissions than legacy technologies.



Reliable

Bloom Energy Server is designed around a modular architecture of simple repeating elements. This enables us to generate power 24 x 7 x 365.



Resilient

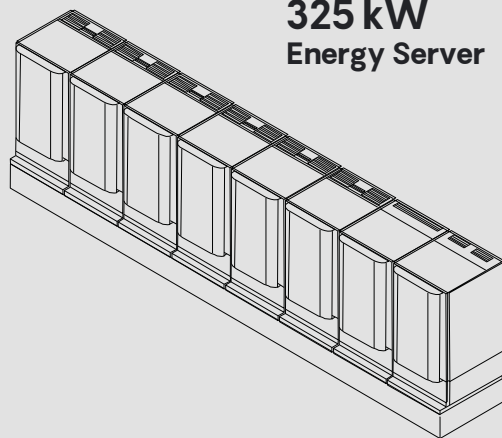
Our system operates at very high availability due to its fault-tolerant design and its use of a robust natural gas pipeline system. The Bloom Energy Server has survived extreme weather events and other incidences and continues to provide power to our customers.



Simple Installation and Maintenance

The Energy Server is 'plug and play' and has been designed in compliance with a variety of safety standards. Bloom Energy manages all aspects of installation, operation and maintenance of the systems.

325 kW Energy Server



Specifications

Outputs

Nameplate power output (net AC) 325 kW
Voltage 3-ph. 480, 415, 400 and 380 V
Frequency 50/60 Hz

Inputs

Fuel¹ Natural gas
Input fuel pressure 12–18 psig (15 psig nominal)
0.82–1.24 bar (1 bar nominal)
Water None during normal operation

Efficiency

Cumulative electrical efficiency 65–53% (LHV net AC)
Heat rate (HHV) 5,811–7,127 Btu/kWh (6,131–7,519 kJ/kWh)
Cumulative thermal efficiency >36%
Total efficiency >90%

Emissions²

NO_x 0.003 lbs/MWh (0.001 kg/MWh)
SO_x Negligible
CO 0.013 lbs/MWh (0.005 kg/MWh)
VOCs 0.01 lbs/MWh (0.004 kg/MWh)
CO₂@stated efficiency 679–833 lbs/MWh (308 – 378 kg/MWh)

1. Contact Bloom Energy for information on using biogas, blended hydrogen and hydrogen with the Energy Server
2. NO_x and CO measured per CARB Method 100, VOCs measured as hexane by SCAQMD Method 25.3
3. Certifications expected to be available in 2024

Physical Attributes and Environment

Weight (w/skid) 31,926 lbs (14.8 mt)
Dimensions (w/skid) 29'5" x 4'4" x 8'2" (9 m x 2.5 m x 1.3 m)
Temperature range -20 °C to 45 °C
Humidity 0%–100%
Seismic vibration ASCE7 SDC (Seismic Design Category) D
Location Outdoor
Noise <65 dBA @ 10 ft (3 m)

Codes and Standards

Safety FC1, UL 1741, UL 1998, CE, KESCO
EMC EN 5501/KN11, EN 61000, KN32, KN35
Grid Interconnection IEEE 1547 2018, UL 1741 SB, CA Rule 21, CEI 016,
KEPCO, G99, C10/11³, VDE³

Meets stringent CARB 2007 Distributed Generation emission standards.

An Energy Server is a Stationary Fuel Cell Power System. It is Listed by UL Solutions (UL LLC) as a 'Stationary Fuel Cell Power System' to ANSI/CSA FC1-2014 under UL Category IRGZ and UL File Number MH45102.

Additional Benefits

Access to a secure website to monitor system performance & environmental benefits. Remotely managed and monitored by Bloom Energy. Capable of emergency stop based on input from the site.



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Flexible. Future Proof.

Accelerate your path to
a zero-carbon future.

1016932-0324



*Fire Prevention and Emergency Planning –
Grid Parallel*

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1. FIRE PREVENTION AND EMERGENCY PLANNING OVERVIEW

The following document is provided only as a guide to assist you in complying with national and local codes and requirements, as well as to provide other helpful information. It is not intended to supersede the requirements of any standard. You should review the standards for particular requirements that are applicable to your individual situation, and make adjustments to this program that are specific to your company. You will need to add information relevant to your facility in order to develop an effective, comprehensive program.

2. FUEL CELL SYSTEM INSTALLATION SAFETY FEATURES

The fuel cell system has redundant safety features and in-system checks to ensure that the system will not harm certified technicians or bystanders near the unit. While the actual fuel cells operate at high temperatures, these components do not move, and are contained within many layers of insulation. During normal operation, the unit is cool to the touch and operates quietly.

The fuel cell system is controlled electronically and has internal sensors that continuously measure system operation. If safety circuits detect a condition outside normal operating parameters, the fuel supply is stopped and individual system components are automatically shut down. A Bloom Energy Remote Monitoring and Control Center (RMCC) operator can also remotely initiate any emergency sequence. An Emergency Stop alarm condition initiates an automatic shutdown sequence that puts the fuel cell system into —safe modell and causes it to stop exporting power. If you have questions about any of these safety features, please contact Bloom Energy.

If you have to shut down your fuel cell system right away—for example, in case of a building fire or electrical hazard—three shutoff controls are installed at your facility external to the system. The locations of these three controls should be known to your facilities manager before operation, and should be noted on your facility diagram that you created with your Bloom Energy account manager. The three shutoffs are the **EPO button**, the **electrical disconnect**, and the **natural gas shutoff valve**.

- An **Emergency Power Off (EPO) Button** cuts all power to all systems and stops them from exporting power to your building. All natural gas flow is also stopped within the systems. (The EPO button is on the front/side of the EDM, if an EDM is installed.) Lift the protective cover and break the glass seal that covers the button with the attached hammer. After the glass seal is broken, the shutdown sequence will automatically begin.



Figure 1: Emergency Power Off Button

- An **electrical disconnect** manually disconnects systems from the grid if needed. Pressing the EPO button should already stop any power transmission, but it does not hurt the systems to also open this disconnect if you believe it is needed. The location of this disconnect will vary, however it is typically located near the point of interconnection where the wires from the fuel cell installation meet the facility's electrical framework. This may be inside your facility's electrical room, or if the fuel cell installation is near the electrical room, it may be found within the switchgear that Bloom Energy installs. This location of this disconnect is shown on the Site Map (see below) and is labeled "(name of electrical utility) Lockable Visible Generator Disconnect Switch".



Figure 2: Electrical Disconnect

- A **manual natural gas valve** shuts down all natural gas to the system. If the valve operator is perpendicular to the pipe, the valve is shut. If it is parallel with the pipe, the valve is open.



Figure 3: Manual Natural Gas Valve

Site map:

- An overhead site map showing the location of all safety features will be posted throughout the fuel cell installation
- Electronic copies are available to you for use in your site planning

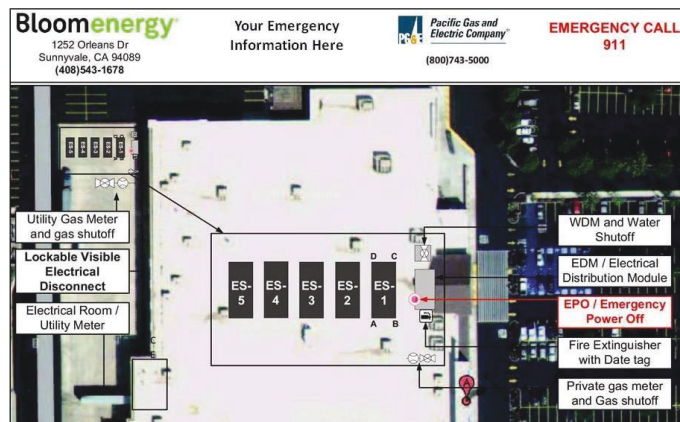


Figure 4: Sample Site Map

Manual controls:

- Clearly marked emergency stop button labeled —Fuel Cell Emergency Shut Down located at site
- Two manual fuel shutoff valves outside the system, and two isolation valves inside the system

Fire hazard mitigation:

- System is plumbed directly to utility-provided natural gas
- If system input gas pressure is compromised, a pressure switch triggers an emergency system shutdown and fuel input is isolated
- System does not use fuel compressors or pumps
- System has virtually no stored fuel (internal capacity is < 5 scf)

Electrical hazard and mitigation:

- System operates at 480V
- Signs inside the system warn of the risk of electric shock
- System has backfeed protection
- System inverter prevents grid backfeed during a power outage

Mechanical hazard and mitigation:

- Finger/hand guard protection is provided on all fans
- All moving parts are located behind secured doors

Material hazard mitigation:

- Desulfurizer bed (to remove fuel impurities) are fully enclosed
- Maintained and serviced by licensed vendors

3. EMERGENCY NOTIFICATION PROCEDURES

Life-Threatening Emergencies

To report life-threatening emergencies, immediately call:

Fire:	911
Ambulance:	911
Police:	911

Conditions that require automatic emergency notification include:

- Unconscious Victim
- Seizure
- Major Trauma
- Chest Pains
- Difficulty Breathing
- Flames

Non-Life-Threatening Emergencies

For non-life-threatening emergencies, report the incident to the local safety control center.

When you report an emergency, give the following information:

- Exact nature of the emergency (describe as clearly and accurately as possible).
- Exact location (i.e., address, building, floor, area, department, etc.).
- Telephone number from which you are calling.
- Your full name.
- **Do not hang up**, as additional information may be needed.

To assist in any subsequent investigation or determination of corrective actions, it is recommended to record the following items as close to the incident time as possible:

- Summary of any violation

- Identification of responsible parties
- Identification of victims and witnesses
- Description of evidence
- Description of general conditions
- Description of any vehicles involved
- Narratives from witnesses
- Any photographs

4. FIRE OR SMOKE PROCEDURES

This section describes the procedures involving a fire or smoke. A major fire is one that requires the use of more than one fire extinguisher or takes more than one minute to extinguish.

If you discover a fire or smoke:

1. Activate the nearest fire alarm if not activated already.
2. Activate the fuel cell Emergency Stop if possible.
3. Shut off the fuel cell installation natural gas line if possible.
4. If the fire is small and does not pose an immediate risk to personal safety, you may attempt to extinguish it with a portable fire extinguisher **only if trained to do so**.
5. Avoid using water on electrical fires.
6. Report every fire, regardless of size, immediately. Smoke or the smell of smoke should be reported.
 - From a safe location dial **911**.
 - Report the incident to the local security safety center.

5. MEDICAL EMERGENCY PROCEDURES

This section describes the necessary procedures for injuries or illnesses that may occur under extreme conditions.

A serious injury can be life-threatening and will require immediate medical attention. Injuries can include head injuries, spine injuries, broken bones, heart attack, stroke, loss of consciousness, excessive bleeding, chemical exposure, etc.

A non-serious injury is not immediately life-threatening but may still require the attention of a medical doctor. These can include headaches, nausea, itching, cuts, burns, etc.

Life-Threatening Medical Emergency

1. Remain calm.
2. Immediately dial 911.
3. Report the incident to local security safety center.
4. Do not move the victim unless it is absolutely necessary.
5. Call out for personnel trained in first aid and/or CPR which may include Building Evacuation or Emergency Response team members.

6. Ask someone to bring the area first aid kit and Automated External Defibrillator.
7. Assist if capable or asked to do so.

Non-Life-Threatening Medical Emergency

1. Remain calm.
2. Report the incident to the local security safety center.
3. Do not move the victim unless it is absolutely necessary.
4. Call out for personnel trained in first aid.
5. Ask someone to bring the area first aid kit.
6. If the victim requires further medical attention, then direct them to the nearest approved medical clinic or hospital – Contact Security or Human Resources for assistance if needed.
7. The injured employee's supervisor/manager is responsible for ensuring injury forms are properly filled out. Complete the forms within 24 hours of incident and submit to the injury reporting system for follow-up. Follow company protocols.

6. MATERIALS RELEASE PROCEDURES

The fuel cell system does not pose a hazard to health or environment. However, some internal materials when released, may pose a irritation risk to people and a possible risk of fire if not properly handled. This section was designed to address potential material release events:

In case of a material release that poses a direct threat to health, safety, or the environment:

1. Report the incident to local safety/security office.
2. If extremely life-threatening immediately dial **911** followed with a call to Security.
3. Contain the spill.
4. Evacuate the area or building if the material release is determined to be life-threatening.

In the event of an unknown indoor smell or odor, report the incident to authorities responsible for HAZMAT and spills.

7. NATURAL DISASTERS AND SEVERE WEATHER

7.1 Earthquake

This section provides information and procedures for earthquake emergencies.

The fuel cell system is designed to automatically shut off if the natural gas supply is compromised.

The natural gas supply line has an external, manual shut-off valve that should be activated if it is safe to do so. This valve will be labeled, "Notice – Fuel Cell Gas Shut

Off". The natural gas line will be labeled with the word "gas" on a yellow background with an arrow pointing in the direction of flow.

The nearby Emergency Stop can be activated to stop the flow of fuel and power to/from the fuel cell system.

A Bloom Energy Field Engineer will validate site safety and system operation during/after severe weather as necessary.

7.2 Flood

The fuel cell system support pad is designed to divert water flow. However, if flooding conditions exist, or threaten to exist due to heavy rainfall, creek bank overflows, or pipe breakage, then immediately report the incident to the local safety/security office.

Do not use the fuel cell power system if any part has been under water. If it is safe to reach the Emergency Power Off button for the site without entering the water, stop all systems until a Bloom Energy representative can assess the site.

Precautions to follow after a flood:

- Stay out of flooded areas. Flooded areas remain unsafe. Entering a flooded area places you at risk.
- Notify Bloom Energy. A Bloom Energy Field Engineer will validate site safety and system operation during/after severe weather as necessary

8. UTILITY OUTAGE

The fuel cell system is operated in "Grid-Parallel" mode. If utility provided power is lost for any reason, the fuel cell system will go "off-line". The fuel cell system will remain in stand-by mode until it automatically senses the utility grid has been restored. If utility gas is shut down, the fuel cell system will begin to shut down completely.

The Bloom Energy Remote Monitoring Control Centers monitor the fuel cells 24 hours per day and will be alerted to utility grid interruptions via its controls software. A Field Service Engineer will be dispatched to restart the fuel cell system if necessary. Customer personnel should NOT attempt to start up or operate the fuel cell system.

Before a Planned Outage

- Notify the Bloom Energy Remote Monitoring Control Center at 1-408-543-1678 at least 24 hours before planned outage.
- Bloom Energy Remote Monitoring Engineers will reduce power generated by the fuel cell system and take the fuel cell off-line.
- Abrupt fuel cell system shutdowns may cause significant system damage.

During a Utility Power Loss

- The fuel cell system will automatically go off-line.
- The Bloom Energy Remote Monitoring Control Centers will monitor the fuel cell system.
- Bloom Energy Field Service will be dispatched to start up the fuel cell system as necessary.
- If the fuel cell system has been automatically shut down and utility power is restored, there will be no impact to building power delivery: primary power will come from the utility rather than the fuel cells.

9. GOOD HOUSEKEEPING AND MAINTENANCE

9.1 Good Housekeeping

Although extremely unlikely, to minimize the risk of fire and any incidents, Facility Managers should take the following precautions around the fuel cell installation:

- What to do if you smell gas:
 - Do not try to light any appliance
 - Do not touch any electrical switch; do not use any phone in the area
 - Leave the area immediately
 - Immediately call your gas supplier. Follow the gas supplier's instructions.
 - If you cannot reach your gas supplier, call the fire department
- Notify Bloom Energy Remote Monitoring Control Center at 1-408-543-1678 of any condition that would impair the safety of the fuel cell installation so that mitigation measures could be determined and placed into effect.
- Prohibit smoking within the area of the fuel cell installation. Bloom Energy will furnish No Smoking signs for the area.
- Ensure only Bloom Energy Service Providers are permitted access inside the system.
- Keep the area around the fuel cell installation clear for ten feet in all directions, for safety and ease of maintenance.
- Keep the area around the fuel cell power system clear and free of combustible materials, gasoline, and other flammable vapors and liquids.
- Shut the system down and call Bloom Energy immediately if you suspect a fuel line rupture.
- **Never enclose an operating system** in a tarp, tent, shed, or other structure that would allow air to become trapped. This system runs on natural gas, and produces trace amounts of CO and CO₂. The amounts of these gases are safe for normal outdoor operation but could gather in an enclosed place.
- Do not block or obstruct air openings on the fuel cell power system. This system requires air flow in order to operate.

- Do not use this fuel cell power system if any part has been under water. Immediately call qualified service personnel to inspect the fuel cell power system and to replace any functional part which has been under water.
- Please contact Bloom Energy at 408-543-1678 with as much advance notice as possible if you plan, detect, or suspect a prolonged Internet outage.
- The Bloom Energy Field Service team will periodically clean the equipment; do not spray with pressurized hoses.

9.2 Maintenance

Your site has specific Field Service personnel assigned to it for both routine maintenance and troubleshooting. Your site project manager will introduce you to the designated Bloom Energy Field Service team assigned to your site prior to operation.

Bloom Energy Field Service personnel are trained in state Safety Law. They are trained in all the procedures required for the fuel cell installation, and their toolkit includes all the safety equipment required to work around the fuel components and high voltage in our system (480VAC).

Bloom Energy also requires its employees to follow all necessary safety precautions, including:

- Every time a Field Service technician arrives at a site for the first time and opens a service panel, the technician will use a leak detector to determine whether there is any gas buildup in the system and determine that it is safe to work on it.
- Whenever a Field Service technician is removing and replacing a component on a fuel or exhaust line, the technician must keep a CO detector nearby to make sure that no CO is present in the line even after the system has been shut down.

The Field Service team expects to conduct quarterly and yearly preventative maintenance for certain types of consumable or cleanable components such as replacement of air filters, water filters, and desulfurizer beds. Other maintenance will be performed as required. During such times, inspections for any hazards will be conducted including quarterly fire extinguisher inspection (if applicable).

10. TRAINING

Prior to system startup, a Bloom Energy representative will provide training on the fuel cell installation to include the location and operation of safety features as well as actions to take during emergencies. We desire this training to provide lasting value and are more than happy to work with you to customize the experience to suit your needs.

Coastal Boundary Map



Project Decommissioning Plan

Following the 20-year operational life of the Facility, the decommissioning plan is as follows:

A) Isolate, lock out and disconnect all piping at the power module. Remove gas piping to the unit. Disconnect nitrogen purge system from the power module.

B) Disconnect all electrical conductors and conduit at the Energy servers.

C) Contractor will work in concert with Bloom's Service Department personnel during decommissioning and shutdown.

D) Return Site to original condition except for the concrete pads.

E) The decommissioned Energy Servers will be stripped; the parts are separated and either recycled or reclaimed.