8. Cultural Resources.

The proposed Facility will be located in an already developed vicinity, consequently construction and operation of the Fuel Cell will have no unpleasant effect on any cultural (historical and archaeological) resources in the area.

9. Natural Gas Desulfurization Process

Sulfur is present in pipeline natural gas. It is primarily used as an odorant so leaks can be easily detected. Unfortunately, sulfur is also a poison to fuel cell systems and must be removed by the Fuel Cell. For further details of desulfurization please refer to the attached Desulfurization Memo (*See Attachment* #16).

VIII. CONSTRUCTION AND MAINTENANCE

VFS plans to start construction work by September 2024. Construction will take approximately sixteen weeks, followed by approximately four weeks of testing and startup. Regular working hours for the proposed project are Monday through Friday from 8:00 am to 5:00 pm. VFS and its contractors will fully cooperate with the CT. State Building Inspectors and will follow all Town of Mansfield and Connecticut State construction policies and codes.

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IX. LOCAL INPUT AND STATE FUNDING

For years, VFS has worked closely with the UConn Administration in pursuit of energy efficiencies and deploying clean fuel cell technologies on the campus. This project will be constructed by VFS and the energy will be sold to UConn under an Energy Services Agreement (ESA). No State funds will be used to construct this facility. This project is part of a larger campus wide plan to deploy fuel cells in combined heat and power configurations to bolster UConn's grid resiliency and provide clean, low cost, reliable energy to the University.

VFS is proud to welcome student involvement in this pursuit and continues to work with University faculty and students in planning and deploying these valuable renewable energy assets.

X. CONCLUSION

As set forth above, VFS requests that the Council issue a determination, in the form of a declaratory ruling, that the proposed installation above is not one that would have a substantial adverse effect, and, therefore, that a Certificate is not needed.

Respectfully submitted,

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