



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. 1630** – 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 Putnam Dining Hall on the University of Connecticut campus, 2358 Alumni Drive, Storrs (Mansfield), Connecticut. **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 June 28, 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

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VIA ELECTRONIC MAIL

June 28, 2024

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

RE: PETITION NO. 1630 – 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 Putnam Dining Hall on the University of Connecticut campus, 2358 Alumni Drive, Storrs (Mansfield), Connecticut. Council Interrogatories to Petitioner.

Dear Steve Pearson:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 19, 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 19, 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,

A handwritten signature in black ink, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

MAB/MP

c: Service List dated May 15, 2024

**Petition No. 1630
VFS, LLC
University of Connecticut
2358 Alumni Drive
Storrs, Connecticut**

**Interrogatories
June 28, 2024**

Notice

1. Pages 14 and 15 of the Petition appear to be missing in the hard copy (not electronic) version of the Petition. Provide a copy of the text of pages 14 and 15 of the Petition. **See attached #1.**
2. 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 the University of Connecticut regarding the fuel cell project. VFS has had numerous discussions with Stan Nolan (Interim Associate Vice President) and Alex Stachowiak (Associate Director of Utilities Infrastructure). Periodic coordination meetings are held between UConn, VFS, the site designer and construction company to discuss and address all customer concerns.**
3. Has VFS, LLC (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**

Project Development

4. What is the estimated cost of the proposed project? **The cost to develop and build this project is \$6,900,000.**
5. Referencing pages 1 and 3 and Sheet GA1.0 of the Petition, the proposed facility would be designed for a future Battery Energy Storage System (BESS). What equipment would be necessary to facilitate future interconnection of a BESS? When does VFS anticipate installation of the BESS? **The facility will be designed to accept the BESS in Q2 of 2025. A step-up transformer and an appropriate disconnect switch will be added at that time.**

Proposed Site

6. Referencing Petition p. 8, the nearest residential property is approximately 80 feet west of the facility. Is the 80-feet to the property line or the residential structure? What is the address of this property? **The Facility is 80' +/- from the structure at 83 Cheney St.**
7. What is the distance and direction of the nearest on-campus residential building from the proposed fuel cell facility? What is the address of this property? **Nathan Hale Hall is the closest on campus residence, some 115' to the North.**
8. Is Alumni Drive an on-campus road? Is there restricted access? **Alumni Drive is an on-campus road and is not specifically restricted.**

9. Submit photographs of the proposed fuel cell facility site with descriptive captions and/or a map identifying the locations of the photographs.



Satellite View (proposed fuel cell location in red box)



Street View (proposed fuel cell location in red box looking Southwest)

10. Referencing Petition Attachment 9, p. 7, there appears to be an access drive/path from the residential development to the west that leads to a crosswalk along Alumni Drive. What is the distance from the fuel cell facility to the access drive/path? **The facility is Approx. 30' to the South of the pedestrian path to off-site housing.**

Proposed Facility and Associated Equipment

11. Referencing Petition pp. 1 and 2, would the proposed facility provide electricity and thermal energy to Putnam Refectory, Nathan Hale Hall, and/or any other buildings at UCONN? Explain. **The Facility will provide electrons to the on-campus grid and the thermal energy will be used locally at the Putnam refectory.**
12. Would the proposed fuel cell be able to provide backup emergency power for the Putnam Refectory, Nathan Hale Hall and/or any other buildings at UCONN? Do Putnam Refectory and Nathan Hale Hall have existing backup power? **Both buildings have emergency backup generation provided by diesel generators. The proposed Facility design will not provide backup generation for the buildings.**

Energy Output

13. Referencing page 15 of the Petition, the energy would be sold to UCONN under the Energy Services Agreement. Which entities would purchase the capacity and renewable energy certificates (RECs), if applicable? **The University of Connecticut will be purchasing the power provided by the Facility. UConn has appointed VFS to be its agent for purchasing RECs.**
14. Referencing Petition p. 3, provide the percentage of baseload of the building(s) that would be supplied by the facility. **6 MW**
15. Referencing Petition p. 3, does the 94% maximum total efficiency include the utilization of waste heat, the future BESS or both? Explain. **By utilizing the combined heat and power from the Facility a maximum total efficiency of 94% can be achieved. The BESS does not contribute to the efficiency of the Facility.**
16. 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 UCONN buildings? **All power will be consumed by UConn.**

Electrical Interconnection

17. Is the project interconnection required to be reviewed by ISO-NE? **NO**
18. Does VFS have an interconnection agreement with Eversource? If yes, when was it finalized? If not, when is the anticipated completion date? **Application will be submitted during the month of July and is expected to be approved on the Fast Track approval process.**
19. Referencing Site Plan GA1.0, provide a code key for items that are abbreviated (e.g. SAN, FP, etc.).
GAS= Natural Gas Main, FP= Fire Protection Main, SAN= Sanitary Sewer, Electrical= Buried Electric Line.
20. Referencing Petition Drawing GA1.0, would the proposed facility connect to the Eversource #4183 pole, #219 pole, or both? What is the line voltage of the proposed electrical interconnection? **13.8kv overhead will be relocated to existing underground power raceways. The point of connection will be the existing duct bank at manhole #20 at 13,800 volts.**
21. Provide a drawing depicting the utility, electrical, water, and gas utility connections for the facility, or, alternatively, include such information on Drawing GA1.0. **Water will be supplied from the refectory. Gas will be brought to the gas meter pad by the gas company. Electric will be from Manhole #20 which is in front of Nathan Hale Hall. Reference updated GA1.0 Rev. 07/01/2024 see attached #2.**

Public Health and Safety

22. 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 building and fire codes including NFPA 853, IBC as adopted by the State of CT, NEC as adopted by the state of CT, and all applicable mechanical and plumbing codes. The Facility construction will be inspected by UConn Building Dept. Officials.**

23. What security measures would be employed to protect the fuel cell units/components from vandalism or intrusion? **A 12' chain link fence equipped with two locking gates will secure the Facility. Knox box access system will be provided for first responder access.**
24. Would the proposed facility be enclosed by a fence? Provide the design specifications of the proposed fence. **Yes, a 12' high chain link with privacy slats and locking gates will enclose the facility.**
25. Site Plan Sheet GA1.0, 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? **As explained in the petition the Nitrogen is used to purge any gas from the fuel processing section of the fuel cell enclosure during an emergency shutdown. Nitrogen is an inert gas and is not explosive.**
26. 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 will be dispatched for all emergency events including fire. **ALL emergencies are responded to by HyAxiom Service personnel. UConn fire Dept. personnel and police are already trained to respond to an emergency involving a fuel cell. Site specific training will be provided for this site as well.**
27. 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. **No interference with any existing utility will occur during the construction or operation of the Facility.**
28. 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 provided powered from a locally switched circuit.**
29. Referencing Petition p. 8, it states the nearest airport is over 5.5 miles away. Identify this airport. **Windham Airport, North Windham, CT**
30. What is the distance from the proposed facility to the nearest heliport? **The facility is 5.5 miles from any known heliport (Windham Airport, North Windham, CT)**
31. Would a crane be required for construction? If yes, to what height would the crane boom be extended?
A crane with an expected boom length of 130' will be utilized for construction of the fuel cell Facility and associated equipment.
32. Referencing Petition Attachment 9 – Noise Assessment, p. 3, would noise mitigation measures be installed in accordance with the recommendations for implementation on both the east and west sides? Identify the type of mitigation that would be installed and where it would be located. **A 12' high fence will support sound blankets as called out in the mitigation plan which is attached #3.**

Environmental Effects and Mitigation Measures

33. What is the type and quantity of insulating oil within the proposed transformer? Would the transformer 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).**
34. 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 desulfurizer is mechanically disconnected from the fuel cell and capped. The vessel is removed with the use of a forklift, placed on a truck and transported to a recycle facility where catalyst is removed, and the vessel is returned for reuse. This is detailed in the petition.**
35. Would construction comply with the Connecticut Soil Erosion and Sediment Control Guidelines, effective March 30, 2024? **Yes.**
36. 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 Prime farmland will be utilized for installation of the facility.**