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December 3, 2024

VIA ELECTRONIC MAIL AND FEDEX

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

Re: PETITION NO. 1637 – KCE CT 11, 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 4.99-megawatt AC battery energy storage facility and associated equipment located at 100 Salmon Brook Street, Granby, Connecticut, and associated electrical interconnection.

Dear Ms. Bachman:

I am writing on behalf of my client, KCE CT 11, LLC, ("KCE") in connection with the above-referenced Petition. With this letter, I am enclosing the original and fifteen copies of the Responses to the Second Set Interrogatories issued by the Council on November 21, 2024. Please note that Attachment B to the responses to the Second Set of Interrogatories contains confidential business information of a similar nature to that which has already been addressed by a Protective Order that has been issued in this Petition. Accordingly, KCE hereby requests that Attachment B to these interrogatory responses be subject to the same Protective Order.

Additionally, the Siting Council requested that KCE file late filed exhibits. KCE is filing the following late filed exhibits as requested by the Council:

1. A copy of the Plume Study;
2. A copy of the Canadian Solar Emergency Response Plan guidance.
3. A copy of the EPRI Study entitled *Lessons Learned from Air Plume Modeling of Battery Energy Storage System Failure Incidents*;
4. A white paper related to system operational benefits of the proposed facility and its location; and
5. A copy of the Fire Fighting Operations with Lithium-Ion Batteries document.

In addition to the late filed exhibits listed above, KCE wishes to file the following late file exhibits:

6. The November 21, 2024 NDDB New Determination Letter from CT DEEP.
7. The Connecticut Department of Public Health Map of Service Areas of Community Public Water Systems. This map was to be included in the response to Interrogatory 58 from the Council's First Set of Interrogatories but was inadvertently not included.

8. The Standard SolBank Fire Safety Design, which contains confidential information that is responsive to the Town of Granby's Interrogatory Number 8.
9. Safety Data Sheets for Battery Energy Storage System, which is responsive to the Town of Granby's Interrogatory Number 54.

Please note that Late Filed Exhibits 2, 8 and 9 contain confidential business information of a similar nature to that which has already been addressed by a Protective Order that has been issued in this Petition. Accordingly, KCE hereby requests that Late Filed Exhibits 2, 8 and 9 be subject to the same Protective Order.

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been submitted to all parties on the Application's Service List as of this date.

Sincerely,

Lee D. Hoffman

Lee D. Hoffman

Enclosures
cc: Service List

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

PETITION NO. 1637 – KCE CT 11, 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 4.99-megawatt AC battery energy storage facility located at 100 Salmon Brook Street, Granby Connecticut and associated electrical interconnection.	**Petition No. 1637**
	December 3, 2024

KCE CT 11, LLC, a subsidiary of Key Capture Energy ("KCE" or the "Petitioner") hereby submits the interrogatory responses that were directed to KCE by the Siting Council on November 21, 2024.

1. Referencing Exhibit C of the Petition and pursuant to CGS §16-50o(c), please submit a copy of the option to purchase agreement for the facility site. A Motion for Protective Order may be filed for any confidential information.

Please refer to Attachment A, which is an unredacted copy of the publicly filed Notice of Real Estate Purchase Option. The Real Estate Purchase Option Agreement contains confidential information. It is being filed pursuant to a Motion for Protective Order, and will be labeled as Attachment B.

2. 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 and the other New England States currently have an over reliance on natural gas as a fuel for home and business heating, cooking and electricity generation. As a result, during extreme winter events, the region has and may continue to suffer reliability issues. In addition, this reliance on natural gas for a majority of the generation of electricity causes electricity prices to spike regionally any time natural gas prices increase.

The proposed CT 11 BESS and additional resources will improve reliability during these periods by peak shaving and providing electricity during high demand periods, resulting in less reliance on gas peaker generators. During these periods, BESS located throughout the state such as CT 11, will allow best use of any excess renewable energy generation making it more available during peak demand periods. As the State of Connecticut and other New England states increase the reliance on intermittent renewable energy to decrease the reliance on fossil fuel generation, CT 11 and other BESS throughout the state and region will be necessary to maintain electric power supply reliability.

Lithium-ion systems have rapid response times, high safety and industry-proven reliability and versatile applications. While other technologies currently provide grid support (flywheel, pumped hydro, zinc-air, etc.), lithium-ion battery systems provide a highly versatile platform which can address a wide variety of use cases in wholesale energy markets, including energy arbitrage, spinning and non-spinning reserves, frequency regulation, voltage support, reactive power capability, etc. BESS are capable of responding with their full capacity in less than 250 ms in cases when needed (e.g. frequency response). When not in the frequency response ancillary market, KCE institutes a variable ramp rate depending on site requirements. The facilities are capable of Automatic Generation Control (AGC) from 0% State of Charge (SOC) to 100% SOC and from fully charging (-100 MW) to fully discharging (+100 MW) with no manual intervention (full AGC).

The Project will support system reliability under contingency conditions. The Project can be scheduled on peak days to mitigate potential exposure to thermal violations and displace a portion of total energy capacity that would otherwise be provided by fossil generation. In addition to ensuring local system reliability, the Project can provide reserves (e.g. 10-minute spinning reserve) during times when it's not needed to support local reliability. The Project will be capable of smoothing peak demand and the generation profile of intermittent renewable energy. The Project will be able to charge during periods of low load and/or high renewable generation and discharge during high load periods when transmission elements are overloaded, displacing generation that would otherwise be provided by greenhouse gas (GHG) emitting resources. As an ultimate benefit to ratepayers and the community, the Project will facilitate increased renewable penetration without sacrificing reliability.

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

The Connecticut State Legislature has established energy policy. Specifically in 2021, the General Assembly enacted legislation for the Public Utilities Regulatory Authority (PURA) to establish a goal for front of the meter DG projects, such as KCE CT 11, and directed PURA to meet the established goals pursuant to the Connecticut Section 3 of Public Act 21-53. KCE is developing the KCE CT 11 stand-alone BESS in specific response to and in order to support of the following Connecticut legislative goals:

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

2) Provide multiple types of benefits to the electric grid, including, but not limited to, customer, local, or community resilience, ancillary services, peak shaving, and avoiding or deferring distribution system upgrades or supporting the deployment of other distributed energy resources;

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

4) Prioritize delivering increased resilience to:

(a) low-to-moderate income (LMI) customers, customers in environmental justice or economically distressed communities, customers coded medical hardship, and public housing authorities as defined in Conn. Gen. Stat. § 8-39(b);

(b) customers on the grid-edge who consistently experience more and/or longer than average outages during major storms; and

(c) critical facilities as defined in Conn. Gen. Stat § 16-243y(a)(2).

5) Lower the barriers to entry, financial or otherwise, for electric storage deployment in Connecticut;

6) Maximize the long-term environmental benefits of electric storage by reducing emissions associated with fossil-based peaking generation; and

7) Maximize the benefits to ratepayers derived from the wholesale capacity market.

As noted in Conn. Gen. Stat. §16-243ee(c):

> In undertaking the proceeding described in subsection (a) of this section, the authority shall consider one or more programs and rate designs to incentivize the deployment of electric energy storage technologies connected to the electric distribution system that most effectively leverage the value of such technologies to achieve objectives including, but not limited to, (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.

Furthermore, the Project will be a key component of the competitive market. The ability for generation to be built, including BESS, is necessary for the existence of a competitive market. The ability for projects to get permitted is necessary for that market development. By dispatching electricity into the wholesale market during peak hours at a cheaper price than fossil peaking power plants, we can reduce electricity prices for Connecticut. Projects such as CT 11 will be essential as the state transitions to electrification and reliance on renewable energy generation, thus being a vital component to the development of a competitive market.

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

The Project has ISO-NE Capacity Supply Obligations for the Capacity Commitment Period June 2027- 2028 and will contribute to forecasted generating capacity requirements. The Project will continue to participate in the capacity market with the objective of securing subsequent capacity supply obligations. As such, ISO-NE is now counting on this Project to participate as a capacity resource and if the Project is not allowed to proceed, the qualified capacity available to the market with obligations would be reduced.

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

The KCE CT 11 Project and other similar projects in Connecticut will allow better use and availability of local renewable energy resources, such as the Simsbury 25 MW solar project and other regional generation. The ability of BESS projects to time shift renewable generation from periods of high supply to periods of high demand increases the useful capacity of near regional generation thereby reducing the dependence on imported generation. Additionally, the ability of BESS to replace electricity from peaker plants during short periods of demand lowers the need for imported fossil fuels.

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

KCE CT 11, as a standalone BESS, has the ability to time shift generation from periods of over supply to periods of high demand. This improves the use of diverse generation at all times of day as the Project may charge from any form of generation that may be discharging energy during the periods of oversupply and make use of that energy. BESS also adds flexibility to the system without adding new fuels.

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

KCE is developing the KCE CT 11 stand-alone BESS in specific response to and support of the PURA goals to increase front of the meter distributed BESS resources as directed by the Legislature. Please see response to question 2.a.

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?

Connecticut and the other New England States currently have an over reliance on natural gas as a fuel for home and business heating as well as cooking and electricity generation. As a result, during extreme winter events, the region has and may continue to suffer reliability issues. The proposed CT 11 BESS will improve reliability during these periods by peak shaving and providing electricity during high demand periods resulting in less reliance on gas peaker generators. During these periods, BESS located throughout the state, such as CT 11, will allow best use of any excess renewable energy generation making it more available during peak demand periods.

3. Please confirm the following:

a) Distance from the BESF perimeter fence to nearest property line;

The distance from the proposed BESF perimeter fence to the nearest property line is approximately 61 feet, to the southeast. Per the June 2014 Town of Granby Zoning Map, this adjacent parcel to the southeast is zoned ED - Industrial Zone and has historically operated as a planting nursery.

b) Distance from the BESF perimeter fence to the nearest residential property line if the nearest property line referenced above is not residential;

The distance from the proposed BESF perimeter fence to the nearest property line of a residential use is approximately 395 feet, to the west across Salmon Brook Street. Per the June 2014 Town of Granby Zoning Map, this collection of single-family residential use parcels to the west are zoned T1 - Commercial Transition Zone.

c) Distance from the nearest part/corner of the battery containers to the nearest property line;

The distance from a proposed battery container to the nearest property line is approximately 112 feet, to the southeast. Per the June 2014 Town of Granby Zoning Map, this adjacent parcel to the southeast is zoned ED - Industrial Zone and has historically operated as a planting nursery.

d) Distance from the nearest part/corner of the battery containers to the nearest residential property line;

The distance from a proposed battery container to the nearest property line of a residential use is approximately 477 feet, to the west. Per the June 2014 Town of Granby Zoning Map, this collection of single-family residential use parcels to the west are zoned T1 - Commercial Transition Zone.

e) Distance from the nearest part/corner of the battery containers to the nearest residential structure; and

The distance from a proposed battery container to the nearest residential structure is approximately 577 feet, to the west. Per the June 2014 Town of Granby Zoning Map, this collection of single-family residential use parcels to the west are zoned T1 - Commercial Transition Zone.

f) Distance from the nearest part/corner of the battery containers to the nearest building in the shopping plaza to the north.

The distance from a proposed battery container to the nearest building in the shopping plaza to the north is approximately 253 feet, to the northeast.

4. Would a crane be required for construction? If so, would FAA notice for use of the crane be required?

For KCE CT 11, a crane would be used to offload large heavy pieces of equipment. Based on Federal Aviation Administration (FAA) Notice Criteria Tool, notification would not be required as long as the crane has a maximum operating height of 100 feet or less. KCE does not anticipate using a crane that will have an operating height in excess of 100 feet. In addition, per the FAA, a permit is required for any crane work within 3 miles of an airport, or closer, if the work is in the glide path of a runway with the understanding that the distance may be increased if the work is in the direct line of a runway – considered to be within the "glide path" of aircraft during takeoff or landing. The Project is greater than 3 miles from an airport and is not considered to be in a "glide path". Therefore, KCE does not expect to meet the criteria for a required filing with the FAA.

Prior to a crane mobilizing on site, KCE would request at a minimum from the crane company, a crane lift plan with load calculations for each piece of KCE's equipment to be lifted and placed in its final location, a copy of the crane operator's license/certification for that piece of equipment, drawings and rigging calculations for ancillary materials used for the lift (crane mats, spreader bars and components, shackles, slings) and the annual crane inspection report, certified by a 3rd party.

Upon further determination by the crane company selected to perform the work, in the unlikely occurrence that the crane maximum height would be anticipated to exceed 100 ft, KCE would file a Notice of Proposed Requirement Construction or Alteration (FAA Form 7460-1) with the FAA at least 30 days before construction begins. In this scenario, prior to raising a crane boom, KCE understands a Determination of No Hazard to Air Navigation is required from the FAA.

The crane will be located to minimize any additional moves for the lifts of larger pieces of equipment on site. The larger pieces of equipment will be brought on site one tractor trailer at a time, the riggers will prepare the load, securely attach the load to the crane, coordinate communication with the rest of the team to safely transport the equipment and set the equipment in its final location.

5. Please provide a summary of the available battery technology types and why each technology type could or could not be implemented at the proposed site.

<u>Sodium Ion</u>:

Sodium-ion (Na-ion) batteries are emerging as a potential alternative to lithium-ion (Li-ion) batteries for utility-scale energy storage systems (BESS). Sodium-ion batteries operate on similar principles to lithium-ion batteries but use sodium ions instead of lithium ions as charge carriers. However, this technology is still in the early development and research stages and is not commercially viable in the utility scale market at this time. Therefore, reliable products are not currently available in the utility scale market. This this type of technology is not available for consideration for the KCE CT 11 project.

<u>Positives of Sodium-ion Batteries:</u>

1. Abundant Raw Materials: Sodium is abundant and widely available making sodium-ion batteries potentially sustainable and less prone to supply chain issues. This could lead to lower costs in the much long term for large-scale storage solutions. However, this has not yet been demonstrated at market scale.

2. Lower Cost: Sodium is a lower cost material, and this could translate into lower manufacturing costs for sodium-ion batteries in the future. Industry projections anticipate commercial availability of systems may be towards the end of this decade.

3. Good Performance at Very Low Temperatures: Sodium-ion batteries generally perform well at lower temperatures, which could be beneficial in colder climates or in regions where temperature variation is significant.

4. Environmental Considerations: Sodium-ion batteries are potentially environmentally friendly because sodium is abundant and may be easily recycled.

Challenges of Sodium-Ion Batteries:

1. Lower Energy Density: Sodium-ion batteries typically have lower energy density than lithium-ion batteries, meaning they store less energy per unit of weight or volume. This limits their application in battery energy storage systems where high energy density is crucial for maximizing space and minimizing the weight of the storage system. Even if the technology were more advanced and available, locating a sodium ion battery at 100 Salmon Brook St would require additional space and land disturbance and it is unlikely that a 4.9MW system with setbacks and stormwater management systems would fit at this location.

2. Cycle Life and Efficiency: Sodium-ion batteries have historically faced issues with cycle life (the number of charge/discharge cycles a battery can undergo before its performance degrades) and efficiency. Researchers are working on improving the performance of sodium-ion cells to make them more suitable for large-scale utility applications, but they are still challenged today.

3. Manufacturing and Commercialization: Sodium-ion batteries are still in the early developmental stage compared to lithium-ion batteries, which have been mass-produced and deployed extensively for various applications, including utility-scale BESS. The scaling up of sodium-ion production and supply chains will take time and investment. There are no sodium ion batteries currently available and that would be considered financeable for the KCE CT 11 project.

4. Voltage and Power Output: Sodium-ion batteries typically have lower operating voltages than lithium-ion batteries, which can affect their power output in certain applications.

Iron air:

Iron-air (Fe-air) batteries are a promising emerging technology for large-scale battery energy storage, and there is increasing interest in their viability for utility-scale BESS. However, they are still in the early stages of development and face several technical and cost challenges before they can become widely deployed for grid applications. Therefore, this technology is not available for consideration for the KCE CT 11 project.

Positives of Iron-Air Batteries:

• Abundant and Low-Cost Materials: Iron is one of the most abundant elements on Earth, and the use of air (oxygen) at the cathode significantly reduces the need for expensive materials. This could make iron-air batteries much more affordable compared to other types of batteries, especially for long-duration storage.

• Sustainability: Iron is abundant, and easily recyclable. These batteries could offer a sustainable option for large-scale storage applications that need to minimize the carbon footprint of the energy storage system.

• Long Duration Energy Storage: Iron-air batteries have the potential for high energy density in terms of storage capacity, especially in terms of energy density per unit of weight. Iron-air batteries could also provide longer-duration storage (up to 100 hours or more) compared to lithium-ion batteries, which typically excel in shorter-duration, high-power applications.

Challenges of Iron-Air Batteries:

Despite the promising advantages, there are several significant challenges to overcome before iron-air batteries can be considered commercially viable for utility-scale BESS:

• Energy Efficiency: The energy efficiency of iron-air batteries is currently lower than that of lithium-ion batteries, particularly in terms of charge/discharge cycles. This is primarily due to issues with the electrolyte, reaction kinetics, and overall efficiency of the oxygen reduction/oxidation process.

• Cycle Life and Durability: The cycle life of iron-air batteries is still a major hurdle. The repeated oxidation and reduction of iron can cause the formation of by-products that degrade the battery's performance over time. Improving the durability and cycle life of iron-air batteries is critical for their adoption in grid-scale applications where longevity is essential.

• Slower Charge/Discharge Rates: Iron-air batteries have relatively low power density compared to lithium-ion or sodium-ion batteries, which means they may not be suitable for applications requiring fast response times, such as peak shaving or frequency regulation. They are better suited for long-duration energy storage, where the need is for large-scale, sustained energy output over extended periods (e.g., 12-100 hours).

• Development Stage: While iron-air batteries have been the subject of increasing research, they are still in the experimental phase compared to more mature technologies like lithium-ion. Commercial deployment is not expected until early next decade, as significant technological advancements are needed in areas like electrode design, electrolyte stability, and overall system integration.

• Space requirements: Current space requirement for iron-air BESS is 2.5MW per acre, so a 4.9 MW BESS would require 2 acres. This is for the battery facility only, and does not include other requirements such as setbacks, perimeter clearing, laydown, road and stormwater management. When compared to the proposed KCE CT 11 project with a fenced in system area of 0.53 acres, it is clear that if iron-air battery technology were available, a 4.9MW BESS could not be designed to fit at this location.

Costs: One company developing iron air technology anticipates the cost of energy from their system to be reduced to $35/MWh by 2026. This is well out of current market commercial viability.

Flow batteries:

Flow batteries are increasingly being considered for BESS due to their unique advantages, particularly for long-duration storage and grid stabilization. While they are not yet as widely deployed as lithium-ion batteries, flow batteries have several characteristics that make them a promising future solution for large-scale, stationary energy storage. A Flow BESS would not be applicable at the KCE CT 11 location as the cost of energy would be unaffordable under the PURA front of meter Distributed Generation BESS Program, the systems have low power applications and low energy density meaning the system would not fit the available space at 100 Salmon Brook St.

Positives of Flow Batteries:

• Long Duration Energy Storage: Flow batteries excel at long-duration storage, which is crucial for balancing grid fluctuations caused by intermittent renewable sources such as solar and wind. Flow batteries can provide energy storage for hours to days. This makes them suitable for seasonal storage, grid peaking, and back-up power.

• Safety and Environmental Impact: Flow batteries are inherently safe as they don't use flammable electrolytes, reducing the risk of fires and thermal runaway. Their chemistries are generally considered to be low toxicity.

• Independent Power and Energy Scaling: As the energy storage and power components are separated, flow batteries can be designed to deliver higher capacity or more power independently. This flexibility is advantageous for utility-scale applications, where both the power and duration of storage need to be optimized for specific needs, such as grid balancing or renewable integration.

Challenges of Flow Batteries:

• Lower Energy Density: One of the main limitations of flow batteries is their lower energy density compared to lithium-ion batteries. This means that flow batteries require larger physical systems to store the same amount of energy, leading to higher space and infrastructure requirements. For some applications, particularly where land area is limited, this can be a disadvantage. If the technology were cost competitive, locating a sodium ion battery at 100 Salmon Brook St would require additional space and land disturbance and it is unlikely that a 4.9MW system with setbacks and stormwater management systems would fit at this location.

• Cost: While flow batteries may offer long-term cost savings due to their longevity and minimal degradation, their initial capital cost is higher than lithium-ion systems. The cost of the electrolyte materials, tanks, and balance-of-system components (pumps, pipes, etc.) adds to the overall price.

• Efficiency Losses: Flow batteries typically have much lower round-trip efficiency (the ratio of energy delivered by the battery versus the energy used to charge it) than lithium-ion batteries. Vanadium flow batteries, for example, typically have efficiencies around

70%, compared to 90%+ for lithium-ion batteries. This may make them less attractive for applications where efficiency is critical.

• Complexity and Maintenance: Flow batteries are more complex than lithium-ion systems, requiring additional components like pumps, valves, and cooling systems. The need for continuous electrolyte circulation adds a level of operational complexity, which could lead to higher maintenance costs and increased system downtime if issues arise.

6. Response to Council interrogatory no. 42 states that "A single battery cell gas release and/or fire duration typically is in the range of 1-3 minutes." Since there are 104 cells in each module would one cell cause the others to catch on fire? If so, what would be the typical burn duration for the whole module?

The battery modules are designed to prohibit cell to cell thermal runaway propagation and the BESS is required to demonstrate that thermal runaway will not propagate cell to cell and module to module as part of its required UL 9540A testing. However, should the built-in fire safety features of the BESS fail to perform as intended, past experience with BESS fires of this size (with the fire remaining isolated to one outdoor container) have resulted in an active fire that lasted between 1 and 24 hours.

7. What is the recommended charge rate (The rate at which a battery is charged or discharged as a percentage of the battery capacity) for a lithium phosphate battery cell? Would a 100% charge rate increase the odds of a thermal runaway event?

The recommended charge rate is between 0 and 100% of the plant's power capability. For example, if the project is rated 5 MW at the point of interconnection, then a charge of 100%, or 5 MW, is completely safe. Charging at 100% does not increase the odds of a thermal runaway event. The proposed KCE CT 11 project has many safety measures in place to prevent thermal runaway. This includes 24/7/365 monitoring that allows part of the system or the entire system to be turned off in real-time if something isn't operating correctly and specifically includes:

- prevention and monitoring for overheating,
- prevention and monitoring for overcharging (prevention of continued charge at 100% SOC),
- prevention and monitoring for internal short circuits.

8. Provide a copy of the revised International Association of Fire Chiefs bulletin.

Please refer to the following link, attached hereto as Attachment C: https://www.safetystanddown.org/wp-content/uploads/2023/06/Training-Sheet-Day-2-Firefighting-Operations.pdf

9. What specific protection measures would be employed during construction and operation within the Aquifer Protection Zone?

KCE is familiar with the recommended Best Management Practices (BMPs) documents listed in Section 8.21 of the Town of Granby’s Zoning Regulations regarding the Town mapped Aquifer Overlay Zone, including the BMPs included in CT DEEP’s Connecticut's Aquifer Protection Area Program Municipal Manual (DEEP Municipal Manual). As the proposed Project location is within a municipality-mapped Aquifer Overlay Zone, KCE intends to adhere to the BMPs referenced in Section 8.21 of the Town of Granby’s Zoning Regulations including the following:

<u>Storage of hazardous materials</u>:

Lithium ion-phosphate will be securely contained within the batteries themselves. The dielectric heat transfer fluid within the transformers is made from 100% vegetable oil rather than mineral oil. This fluid is biodegradable and is generally considered non-hazardous, but does require Spill Prevention, Control, and Countermeasure (SPCC) plans for proper storage and/or disposal under EPA 40 CFR 112. Refer to KCE's response to Interrogatory #45 from the Council’s First Set of Interrogatories. The site-specific SPCC will be included in the site-specific Emergency Response Plan.

No underground storage tanks or infiltration wells are proposed, all materials will be stored above ground and in accordance with the DEEP Municipal Manual. The BESF facility will not have floor drains or other devices that allow the release of wastewaters into the ground. The site specific SPCC and Emergency Response Plan will include all appropriate safety information to be disclosed to emergency responders. The Stormwater Management Plan will comply with the requirements of the DEEP Stormwater General Permit and will be developed in a manner to prevent pollution of groundwater.