



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](mailto:siting.council@ct.gov)  
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VIA ELECTRONIC MAIL

October 25, 2024

Lee D. Hoffman, Esq.  
Pullman & Comley LLC  
90 State House Square  
Hartford, CT 06103-3702  
[lhoffman@pullcom.com](mailto:lhoffman@pullcom.com)

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.  
**Council Interrogatories to Petitioner.**

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than November 12, 2024. Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto: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 November 12, 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

c: Service List dated August 29, 2024

Enclosure: Revised Schedule, dated October 25, 2024



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**REVISED SCHEDULE**

**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.

|   |                   |
|---|-------------------|
| Petition received   | 08/02/2024        |
| <b>Council 60-day Action – Hold Public Hearing</b>  | <b>08/29/2024</b> |
| Council Interrogatories   |                   |
| • Set One Issued  | 10/25/2024        |
| • Set One Responses due   | 11/12/2024        |
| Pre-hearing conference via Zoom remote conferencing (11:00 a.m.)  | 10/23/2024        |
| Deadline for Exchange of Interrogatories between Parties and Intervenors  | 11/05/2024        |
| Deadline for State Agency Comments  | 11/12/2024        |
| Deadline for Pre-filed testimony and responses to interrogatories   | 11/12/2024        |
| Deadline to request Party/Intervenor status   | 11/12/2024        |
| <b>Public Hearing 2:00 p.m. evidentiary session and 6:30 p.m. public comment session via Zoom remote conferencing</b><br><i>(refer to Hearing Information section on Petition No. 1637 project webpage for Zoom remote conferencing log in/call in)</i> | 11/19/2024        |
| Continued Evidentiary Session(s) <i>(if necessary)</i>  | TBD               |
| Close of Evidentiary Record   | TBD               |
| Deadline for Party and Intervenor Post Hearing Briefs and Proposed Findings of Fact   | TBD               |
| Close of Public Comment Period  | TBD               |
| Draft Findings of Fact  | 01/09/2025        |
| Draft Findings of Fact, Opinion & Decision & Order  | 01/23/2025        |
| <b>Deadline for Decision</b>  | <b>01/29/2025</b> |

**Petition No. 1637  
KCE CT 11, LLC  
100 Salmon Brook Street, Granby, Connecticut**

**Pre-Hearing Interrogatories to Petitioner  
October 25, 2024**

**Project Development**

1. Has KCE CT 11, LLC (KCE) received any comments since the Petition was submitted to the Council? If yes, summarize the comments and how these were addressed.
2. Referencing Petition Exhibit M, KCE Project Municipal Meeting Record, dated June 25, 2024, in the last row under “Recorded responses from participants,” the Town indicated it would like KCE to present Project information to the Town Selectboard and schedule a public information meeting. Did KCE present Project information to the Town Selectboard and schedule a public information meeting? If so, when were the meetings held, how many people were in attendance, what were their concerns and how were the concerns addressed?
3. If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?
4. What is the estimated cost of the project? How are costs recovered? Is the energy being purchased at market rates?
5. Referencing page 2 of the Petition, was the project selected for the state Energy Storage Solutions Program? If yes, when was the project selected and what program incentives apply to the project?
6. What is the term of the agreement for KCE to provide energy storage, and with which entity? If the facility operates beyond the terms of such agreement, will KCE decommission the facility or seek other revenue mechanisms?
7. If KCE transfers the facility to another entity, would KCE provide the Council with a written agreement as to the entity responsible for any outstanding conditions of the Declaratory Ruling and quarterly assessment charges under CGS §16-50v(b)(2) that may be associated with this facility, including contact information for the individual acting on behalf of the transferee?

**Proposed Site**

8. Describe the surrounding land uses adjacent to the host parcel.
9. What are the benefits of the proposed site location? For example, is the proposed site located within a “load pocket” area or on the “grid edge”?
10. Referencing Exhibit A, Sheet C-2.0 Layout and Materials Plan, what is the length of the existing access drive extending from Mill Pond Road to the point where it would merge with the proposed access drive for the battery energy storage facility (BESF)? Would the width of the existing access easement be sufficient for construction vehicles?

11. Referencing Exhibit A, Sheet C-2.0 Layout and Materials Plan, what is the length of the proposed 24-foot wide access drive for the BESF? Would the proposed access easement be sufficient for construction vehicles?
12. Please submit a copy of the deeded access easement from Mill Pond Drive that is referenced on Petition p. 4.
13. Provide the distance, direction and address of the nearest residential property line from the proposed BESF.
14. What is the distance direction and address of the nearest residential structure from the proposed BESF?
15. Referencing Petition Figure 2, provide the distance of the proposed facility from the existing solar facility on the adjacent parcel to the east. Are there any standards or recommendations for a minimum distance between the two facilities? Explain.

### **Proposed Facility and Associated Equipment**

16. Referencing Petition pp. 3 and 4, provide the number of battery racks per battery storage unit, the number of battery modules per battery rack and the number of battery cells per battery module.
17. Referencing Petition pp. 4 and 5, provide the dimensions (e.g. length, width and height) of the control house.
18. Referencing Petition Exhibit A – Sheet C-2.0, identify where within the compound the control house would be located.
19. Referencing Petition Exhibit A – Sheet C-2.0, list the equipment that would be installed on each equipment pad.

### **Energy Output**

20. How will the facility be dispatched and by whom?
21. When would the facility be dispatched (actively and passively) and for what duration?
22. Is the facility required to reserve any battery storage capability for backup power? Where would the backup power be used and by whom?
23. What is the cumulative efficiency of the discharge output (e.g.- the BESF can only discharge 90% of its stored capacity)?
24. When would the facility recharge (ex. off-peak hours)? What factors are considered for the recharge interval? Explain.
25. What storage capacity losses are anticipated for ambient temperatures below freezing?
26. Is the 4.9 MW AC output based on the point of electrical interconnection?
27. Referencing Petition p. 4, the facility would have a maximum export capacity of 4.9 MW with a four-hour duration allowing a maximum delivery of 19.96 MWh. The eight proposed battery

containers have an energy storage capability of approximately 4.7 MWh each or approximately 38.4 MWh in total. Is the remaining balance of approximately 18.44 MWh a reserve storage, due to electrical losses, to prevent a full depletion of the batteries or other reason(s)? Explain.

28. Referencing Petition pp. 2 and 3, what are KCE's capacity supply obligations to ISO-NE?
29. How is the proposed facility consistent with the objectives of the state Conservation & Load Management Plan?
30. Would the BESF utilize power for cooling and heating of the battery packs? If yes, would this power source be from stored energy or from the local distribution system?

### **Electrical Interconnection**

31. What is the feasibility of alternative interconnection routes such as via the existing and proposed access drive to an electrical distribution line on Mill Pond Road?
32. Is the existing electrical distribution on Salmon Brook Street three-phase, or would it have to be upgraded from single-phase to three-phase?
33. Referencing Petition p. 6, did the System Impact Study determine whether the project would have a cumulative impact on facilities used for the provision of regional transmission service?
34. What is the status of the final interconnection agreement referenced on p. 6 of the Petition?
35. Referencing Petition pp. 4 and 5 KCE notes that "The Project inverters will export energy at 23 kV, so there will be no need for an additional main step-up transformer or substation." However, according to Petition Exhibit B, Equipment Specifications Sheet, references a 34.5-kV operating Grid voltage. Explain how the 23-kV output is obtained from the proposed facility.
36. Referencing Petition p. 5, would the step up transformer paired with each inverter step-down the 23-kV AC grid voltage and then convert it to DC to recharge the batteries? Explain.
37. Provide the distance of the interconnection route from the switchgear to the Eversource utility distribution pole. Identify the Eversource utility distribution pole.
38. Referencing Petition p. 4, and Exhibit A Sheet C-2.0, how many poles in total would be required for the interconnection from the facility to Salmon Brook Street. What is the height of the utility poles above ground level after installation? Provide the distance apart of each pole.
39. Would the facility be able to automatically disconnect from the grid in the event of a fault or other electrical disturbance? Explain.

### **Public Health and Safety**

40. Would the project comply with the current National Electrical Code (NEC) and the National Electrical Safety Code (NESC)? What codes and standards apply to battery storage facilities?

41. Referencing the safety section on page 2 of Exhibit B and Petition p. 15, would the aerosol-based suppression system be installed within the battery cabinets? What type of fire suppression media can be applied to directly to a battery fire?
42. What are the typical causes of a battery fire? What is the typical duration of a battery fire before it self-extinguishes?
43. Referencing Petition Exhibit 12, p. 30 what mechanisms are in place to reduce the possibility of a fire from spreading from one battery unit to an adjacent battery unit?
44. Referencing Petition Exhibit 12 pp. 48-50:
  - a) Would smoke from a battery unit fire be considered hazardous and require notification to state and local authorities?
  - b) Would smoke from a battery unit fire require area residences to stay in place or evacuate? If yes, who would determine if these actions are necessary and who ensures notifications have been made?
  - c) Would the final Emergency Response Plan contain a map with addresses of all properties requiring evacuation and/or isolation for certain types of emergencies? What methodology was used to determine the size of the evacuation and isolation zones?
  - d) What type of emergency would require the evacuation of all persons downwind of the BESF? To what distance from the BESF would evacuation take place in the event of a fire?
  - e) Provide an aerial image showing all properties within the evacuation and isolation zones.
45. Referencing Petition page 16, how much oil will each transformer hold, and will there be alarms (such as low-level oil alarms) that can alert monitors of a leak?
46. Referencing Petition Exhibit G – Acoustic Analysis, will the system generate noise during charging of the facility, discharge of the facility, neutral conditions (i.e. neither charging nor discharging), or all three? Was the modeling performed for the worst-case scenario, and does such scenario also take into account any fans for the cooling system? Explain.
47. Is a gap proposed between the bottom of the fence and grade? What animal deterrents are in place for small animals, such as nesting birds, chewing rodents, etc.?
48. How would first responders access the site? Would a secondary access point be necessary for first responders?
49. Are there municipal fire water sources located in the immediate vicinity of the proposed project for response tie-in in the event of a fire? Explain.
50. Would operation of the BESF cause discernible vibrations at off-site locations?
51. Provide the distance and direction of the nearest airport from the proposed facility.
52. Is there a standard or recommended minimum distance of a BESF to a publicly accessible area?
53. What type of media and/or specialized equipment would be necessary to extinguish a battery storage/electrical component fire? Specifically, based on any history of fires at installed battery systems, is there specialized firefighting equipment necessary to extinguish a Lithium-ion battery fire? Is there a concern with runoff and cleanup caused by fire extinguishment?

54. What are the industry Best Management Practices for Electric and Magnetic Fields at battery storage facilities?
55. Please describe how the proposed facility would comply with the Council's White Paper on the Security of Siting Energy Facilities, *available at: [https://portal.ct.gov/-/media/CSC/1\\_Dockets-medialibrary/Docket\\_346/whiteprFINAL20091009114810pdf.pdf](https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/Docket_346/whiteprFINAL20091009114810pdf.pdf)*

### **Environmental Effects and Mitigation Measures**

56. What is the distance from the limit of disturbance to the wetland boundaries?
57. Referencing Petition p. 7 and Figure 7, provide the total area of farmland soils within the host parcel. Provide the total area of farmland soils that would be impacted by the construction and operation of the proposed facility.
58. Are there any wells on the site or in the vicinity of the site? If so, how would KCE protect the wells and/or water quality from potential construction and operational impacts?
59. Referencing Petition pp. 7 and 9, KCE notes that up to 2 acres of tree clearing would be required. Of that acreage of tree clearing, indicate how many acres would be cleared and grubbed versus cleared only (i.e. not grubbed).
60. Referencing Petition p. 8, provide a copy of the vernal pool survey, if available.
61. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, **as applicable:**

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. Site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

62. Provide a photo-simulation of the proposed facility.
63. Would the existing vegetative barrier remain between the plaza and the site?

### **Facility Construction**

64. Referencing Petition p. 2, “the Project will occupy approximately two acres.” Estimate the total area of disturbance in acres.
65. What is the status of the Geotechnical Investigation referenced on Petition p. 8?
66. Referencing Petition p. 12, since submission of the Petition has KCE met with the DEEP Stormwater Division and/or submitted an application for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities from the Department of Energy and Environmental Protection? If yes, please describe any recommendations, comments or concerns about the project provided by the Stormwater Division and when an application was filed.
67. Would the proposed concrete pads be poured on site or delivered to the site? Explain.
68. Quantify the amounts of cut and fill that would be required to develop the proposed facility. If there is excess cut, will this material be removed from the site or deposited on the site?
69. Would any blasting be required to develop the site or stormwater features?
70. Provide the estimated typical construction hours and days of the week (e.g. Monday through Friday 8 AM to 5 PM)? Provide the estimated duration of construction.

### **Facility Maintenance/Decommissioning**

71. Referencing Petition pp. 15 and 28, please provide the following information:
  - a. What is the anticipated annual degradation of battery storage capacity?
  - b. At what remaining battery capacity is replenishment recommended?
  - c. What is the estimated cost of replenishment?
72. Referencing Petition Exhibit J p. 47, what minimum snow depth would require removal within the BESF compound? At what height could snow block the airflow to the chiller and/or electronic compartments?
73. At what intervals and how would vegetation management occur?
74. At what time intervals would the transformers, inverters and switchgear need replacement?