



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

November 21, 2024

Lee D. Hoffman, Esq.
Pullman & Comley LLC
90 State House Square
Hartford, CT 06103-3702
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 – Set 2.

Dear Attorney Hoffman:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than December 3, 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 December 3, 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 blue ink, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

MAB/IN

c: Service List dated August 29, 2024

Enclosure: Revised Schedule, dated November 21, 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
Council 60-day Action – Hold Public Hearing	08/29/2024
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 Intervenor	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
Public Hearing 2:00 p.m. evidentiary session and 6:30 p.m. public comment session via Zoom remote conferencing	11/19/2024
Council Interrogatories	
• Set-Two Issued to Petitioner and Set One Issued to Town	11/21/2024
• Petitioner and Town Responses Due	12/03/2024
Deadline for Late Filed Exhibits and Responses to Interrogatories	12/03/2024
Continued Evidentiary Session 2:00 p.m. via Zoom remote conferencing (refer to Hearing Information section on the Petition 1637 project webpage for Zoom remote conferencing log in/call in)	12/10/2024
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	TBD
Draft Findings of Fact, Opinion & Decision & Order	TBD
Deadline for Final Decision	01/29/2025

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

Interrogatories to Petitioner – Set 2
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.
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.
 - b) Would the proposed facility be necessary for the development of a competitive market for electricity? Explain why or why not.
 - c) Would the proposed facility contribute to the forecasted generating capacity requirements? Explain why or why not.
 - d) Would the proposed facility reduce dependence on imported energy resources? Explain why or why not.
 - e) Would the proposed facility diversify the state's energy supply mix? Explain why or why not.
 - f) Would the proposed facility enhance reliability? Explain why or why not.
 - 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?
3. Please confirm the following:
 - a) Distance from the BESF perimeter fence to nearest property line;
 - b) Distance from the BESF perimeter fence to the nearest residential property line if the nearest property line referenced above is not residential;
 - c) Distance from the nearest part/corner of the battery containers to the nearest property line;
 - d) Distance from the nearest part/corner of the battery containers to the nearest residential property line;
 - e) Distance from the nearest part/corner of the battery containers to the nearest residential structure; and
 - f) Distance from the nearest part/corner of the battery containers to the nearest building in the shopping plaza to the north.
4. Would a crane be required for construction? If so, would FAA notice for use of the crane be required?
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.
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?

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?
8. Provide a copy of the revised International Association of Fire Chiefs bulletin.
9. What specific protection measures would be employed during construction and operation within the Aquifer Protection Zone?