

PETITION BY EAST POINT ENERGY FOR A
DECLARATORY RULING, PURSUANT TO
CONNECTICUT GENERAL STATUTES §4-
176 AND §16-50k, FOR THE PROPOSED
CONSTRUCTION AND OPERATION OF A
15 MW BATTERY ENERGY STORAGE
SYSTEM LOCATED 337 ELM STREET,
WEST HAVEN, CT 06516

Prepared for:
Connecticut Siting Council
March 14, 2025

SECTION 1 Introduction.....	4
1.1 East Point Energy.....	4
1.2 Legal Representation	4
SECTION 2 Consistency with State Energy Policy	5
2.1 Energy Storage Solutions Program	5
2.2 Conservation and Load Management Plan	5
2.3 Connecticut Siting Council “White Paper on the Security of Siting Energy Facilities”	6
SECTION 3 Project Description.....	7
3.1 Project Site.....	7
3.2 Project Purpose	8
3.3 Project Benefits.....	8
3.4 Project Equipment.....	9
3.5 Interconnection	9
3.6 Public Notice and Outreach.....	10
SECTION 4 No Substantial Adverse Environmental Effects	10
4.1 Environmental Assessment Report	10
4.2 Air Quality	11
4.3 Water Resources	11
4.4 Stormwater.....	11
4.5 Habitat and Wildlife.....	11
4.6 Prime Farmland and Core Forest Resources	11
4.7 Cultural and Historical Resources.....	11
4.8 Noise Assessment.....	11

4.9 Visual Impact	12
4.10 Hazardous Materials.....	12
SECTION 5 Project Construction, Operation, Maintenance and Decommissioning ...	12
5.1 Permits Required.....	12
5.2 Construction.....	12
5.3 Traffic.....	13
5.4 FAA Determinations	13
5.5 Operations and Maintenance.....	13
5.6 Decommissioning Plan.....	13
5.7 Safety.....	13
SECTION 6 Conclusion	15
List of Exhibits	15
Exhibit A – Environmental Assessment Report.....	15
Exhibit B – Equipment Datasheet.....	15
Exhibit C – Public Notice and Outreach	15
Exhibit D – Material Safety Data Sheets.....	15
Exhibit E – Decommissioning Plan	15
Exhibit F – Draft Emergency Response Plan (ERP).....	15
Exhibit G – Single Line Diagram.....	15

SECTION 1 Introduction

Pursuant to Section 16-50k and Section 4-176(a) of the Connecticut General Statutes ("CGS") and Section 16-50j-38 et seq. of the Regulations of Connecticut State Agencies ("RCSA"), East Point Energy ("East Point") requests that the Connecticut Siting Council ("Council") issue a Declaratory Ruling that a Certificate of Environmental Compatibility and Public Need ("Certificate") is not required for East Point's proposed construction, operation and maintenance of an 15-megawatt ("MW") West Haven Battery Energy Storage System ("BESS"), a 13.8kV electrical interconnection, and associated equipment (together, the "Project") at 337 Elm Street, West Haven, CT 06516 (the "Property").

As discussed more fully in this Petition for Declaratory Ruling (the "Petition"), the construction, operation and maintenance of the Project satisfies the statutory elements of CGS § 16-50k and will not have a substantial adverse environmental effect. East Point therefore respectfully requests that the Petition be issued by the Council.

1.1 East Point Energy

East Point is a standalone, grid-scale energy storage developer, now expanding its construction and asset management scopes. East Point's projects work to make the electric grid more renewable, resilient, and affordable. Our team is currently developing 3.4 GW of energy storage projects throughout the United States and has transacted on multiple projects with some of the largest, most sophisticated energy investors in the country. East Point is a wholly owned subsidiary of Equinor, an international energy company committed to long-term value creation in a low-carbon future.

East Point's team is comprised of hard-working, strategic problem solvers who are passionate about sustainability. We are technology and contractor agnostic, allowing us to find the best solution for each project. The firm's executive team founded East Point in 2018, bringing decades of combined energy development experience. Success for East Point is measured by delivering affordable energy storage solutions that benefit the grid, communities, and our environment.

East Point at a Glance.

- 3.4 GW of energy storage projects actively under development
- Management team has developed over 1.8 GW (\$1.5B) of operating distributed energy resources around the country
- Developed 88 MWh of projects that are now operated by leading electrical utilities in the Commonwealth of VA to include Dry Bridge Energy Center, the largest operational battery energy storage system in Virginia
- Two projects underway in Texas: Sunset Ridge Energy Center (20 MWh) under construction and Citrus Flatts Energy Center (200 MWh), slated to start construction in early 2025.
- Two BESS projects currently pending Council review for energy storage facilities in Oxford and Middletown, Connecticut.

1.2 Legal Representation

All Correspondence and/or communications regarding this Petition should be addressed to:

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SECTION 2 Consistency with State Energy Policy

2.1 Energy Storage Solutions Program

In June 2021, the Connecticut General Assembly passed Public Act No. 21-53, An Act Concerning Energy Storage. The Act directs the CT Public Utilities Regulatory Authority ("PURA" or the "Authority"), in coordination with the Connecticut Department of Energy and Environmental Protection ("CT DEEP") and the CT Green Bank ("CTGB"), to initiate a proceeding to develop and implement programs and associated funding mechanisms incentivizing electric energy storage resources. When undertaking this proceeding, the Authority was instructed to design and administer a new incentive program that accelerates the adoption of electric energy storage technologies such as battery systems. One of the principal goals of the legislation is to unlock the benefits that energy storage technologies deliver to ratepayers.

Consequently, in connection with Public Act 21-53, An Act Concerning Energy Storage, PURA issued a final decision in Docket No. 13-08-05, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Electric Storage, establishing a statewide energy storage program, known as the "Energy Storage Solutions Program" or "ESS Program". PURA issued a decision establishing an end goal of deploying 1000 MW of electric storage by 2030.

2.2 Conservation and Load Management Plan

Pursuant to CGS §§ 16-245(m) and 16-32(f), the State of Connecticut's electric and gas distribution utilities published the *2022-2024 Conservation & Load Management Plan: Connecticut's Energy Efficiency and Demand Management Plan* on May 1, 2022 (the "Plan").

The Plan explicitly identifies energy storage projects, such as the Project, to be a cornerstone of the Plan: "the Companies will promote the co-delivery of energy efficiency and demand management programs that support decarbonization and carbon neutrality,

including ...battery storage.”¹ The Plan continues, “[t]hese active demand response strategies will significantly reduce peak demand and greenhouse gas emissions, helping to mitigate the impact that the state’s building sector has on the environment and climate change. The Companies plan to encourage customers to engage with a more modern grid, improving energy affordability and resilience.”²

The Plan specifically references battery storage as being a priority for the state to reach its energy goals for reducing ratepayer costs, hardening the grid’s resiliency, and improving the state’s environmental footprint.

2.3 Connecticut Siting Council “White Paper on the Security of Siting Energy Facilities”

In response to Public Act 07-242, An Act Concerning Electricity and Energy Efficiency, the Council issued its White Paper on the Security of Siting Energy Facilities to establish the Council’s scope of review of energy security for electric transmission and distribution assets on October 8, 2009. Specifically, the White Paper considers the planning, preparedness, response, and recovery capabilities of transmission and distribution assets, including generation assets. The “clean energy revolution” is often characterized as a transformation from a fossil-fuel based system to a renewable system. While this is correct, system planners, grid operators, and development practitioners see another more fundamental transformation of the energy system: a shift from a centralized system to a de-centralized system. Just as networked computing and telecommunications have undergone this transformation since the 1970s, the electric grid is following a similar path, trading the “hub-and-spoke” star network of Westinghouse’s day, for a more “mesh network,” defined by flexibility, interconnectedness, and resiliency.

The result of this transformation is clear: distributed systems and mesh networks are inherently more secure by eliminating single points of failure. Battery energy storage systems are critical components of this security in their ability to maintain the integrity of the grid’s 60hz sinusoidal wave form and provide excess electric capacity in the event of a grid outage. They give grid planners flexibility when upgrading distribution systems, allow businesses to be prepared for outage events, offer dynamic millisecond response capability to a variety of systemic needs, and, most importantly, can provide first responders time and options during emergency events. Battery Energy Storage Systems (BESS) help to smooth out fluctuations in output. Energy storage solutions capture, and store energy generated from clean sources and deploy it during times of peak demand, maximizing the benefits of clean energy and minimizing outages.

In short, the proposed Project, both as a distributed asset, and as a physically secure and 24/7 remotely monitored asset, would be part of Connecticut’s evolution towards a more secure and resilient energy system.

¹ 2022-2024 Conservation & Load Management Plan: Connecticut’s Energy Efficiency and Demand Management Plan: Connecticut’s Energy Efficiency and Demand Management Plan, Pg 16, available online [2022-2024 \(ct.gov\)](https://www.ct.gov/energy/2022-2024%20Conservation%20and%20Load%20Management%20Plan)

² 2022-2024 Conservation & Load Management Plan: Connecticut’s Energy Efficiency and Demand Management Plan: Connecticut’s Energy Efficiency and Demand Management Plan, Pg 16, available online [2022-2024 \(ct.gov\)](https://www.ct.gov/energy/2022-2024%20Conservation%20and%20Load%20Management%20Plan)

SECTION 3 Project Description

Designed in accordance and with input and guidance from the United Illuminating (“UI”), the proposed stand-alone front-of-the-meter BESS consists of two interconnections services to the UI owned distribution system, with a total capacity of 15 MW / 60 MWh. The 15 MW output is based on the point of electrical interconnection but may be adjusted slightly when interconnection is finalized with UI. The Project could power approximately 11,250 homes for a four-hour duration. The BESS facility (“Facility”) will operate between 0 MW and 15 MW. The electricity stored in the batteries will be dispatched according to the needs of the grid, or to the wholesale markets in the form of capacity. These functions support grid reliability, stability and affordability. The BESS can dispatch almost instantaneously once called on by the Energy Management System. Typically, this is a matter of milliseconds, which allows the BESS to supply an array of services in the event of an unexpected outage elsewhere on the electrical grid.

Currently, East Point is considering using the Sungrow PowerTitan 2.0 battery enclosures for the Project. East Point will select final equipment suppliers and execute procurement contracts when all the permitting and regulatory obligations have been completed. The timing for final equipment selection will depend on interconnection timelines, completion of all permitting, equipment lead times and equipment availability. The final product selected for use at the Property will adhere to the same strict safety and operating parameters and will be aesthetically very similar to a containerized solution. Any changes to the proposed design will be in accordance with all utility requirements to ensure there are no negative effects on the interconnection of this project to the utility grid. Additionally, any alterations to equipment related to the site layout will be coordinated with the Council and appropriate local permitting authorities.

3.1 Project Site

The Project will be located at 337 Elm Street, an approximately 0.68-acre parcel positioned north of Elm Street (the “Property”), a rear lot with a 30-foot-wide access Right-of-Way (“ROW”) through the eastern portion of the abutting parcel to the south, at 345 Elm Street. The L-shaped Property is developed with a single story 3,016 square foot (“SF”) metal building to the northeast and a ±4,421 SF single story concrete block building along the eastern boundary.

The Property is privately owned and is in West Haven’s Neighborhood Business (NB) District. The UI Elm Street Substation (“Substation”), a 15-foot-wide electrical distribution easement, and a paved access road are located adjacent to the Property’s eastern boundary. UI’s overhead transmission lines associated with the Substation traverse the northeastern portion of the Property. The Metro-North/Conrail Railroad right of way is separated from the Property by a narrow-vegetated buffer. An ‘Xpress Fuel’ gas station occupies the southern abutting parcel where the previously mentioned 30-foot ROW provides access to the Property from Elm Street. Residential development is located to the west and in the general vicinity.

The Project will utilize the entire Property. As such, the previously mentioned buildings on the Property will be demolished prior to construction of the Facility. Once complete a sound barrier will encompass most of the Project perimeter except for the northern boundary

abutting the Metro-North/Conrail Railroad Right of Way where a standard 7-foot-tall fence will be constructed. Gravel surfaces will extend throughout the Property with areas of concrete pads to support battery storage units and equipment cabinets. The electrical interconnection will extend underground along the northeastern side of the facility and connect directly into the abutting Substation. The Project in its entirety will occupy ± 0.68 acres (the “Site” or “Project Area”).

The Property’s existing topography is generally flat except for two fill piles along the western boundary. Elevation ranges from 18 feet above mean sea level (“AMSL”) to 22 feet AMSL

3.2 Project Purpose

The proposed Project aims to meet the ESS Program goals by benefiting the community through lower electricity costs, enhanced grid resilience, and reduced emissions from fossil-based peaking generation.

3.3 Project Benefits

The Project is an enabling technology for the grid’s transition to renewable energy. The BESS will charge from the grid at non-peak hours when there may be surplus energy on the grid and prices are lower and then return or “discharge” that electricity back to the grid at peak demand when electricity prices are high. For instance, surplus energy from wind or solar generation, which would otherwise go unused, is utilized to charge the BESS. This stored energy can then be released back into the grid during periods when wind or solar generation is low or when electricity supply is insufficient to meet demand.

By discharging electricity back on to the grid during peak demand, BESS projects generally, including the Project, can help to reduce or eliminate the need for carbon-intensive fossil fuel generation sources, such as coal or natural gas.

At a local level, this “peak-management-focused” operational approach will take stress off the local distribution grid, increasing grid reliability to help reduce the frequency of outages and relieving stress on the local network’s infrastructure such that the utility can defer or delay expensive system upgrades. Put simply, the Project will be a critical part of a larger strategy to reduce costs, reduce outages, and improve the reliability of energy for the community’s businesses and residents.

The Project will be one of the first strategic assets to participate in the ESS Program and, as part of that program’s target for a large, distributed portfolio, the Project will deliver the following benefits recognized by the Authority in Docket No. 23-08-05:

(1) Economic Benefits: The Project will support the ESS Program’s economic goals by reducing peak grid demand, lowering ratepayer costs, and adding capacity to help utilities avoid costly infrastructure upgrades. Revenue from local taxes can fund infrastructure projects and increase support for schools and community initiatives. Additionally, it will enhance business uptime by preventing outages, facilitate the integration of cheaper renewable resources like solar and wind, and mitigate the healthcare and economic costs linked to higher-polluting energy sources.

(2) Resiliency Benefits: The proposed BESS would enhance reliability by providing fast, responsive power during imbalances, managing peak demand, supporting renewable energy integration, acting as a backup during disruptions, and providing important grid services like frequency regulation. Its ability to quickly respond to changes and store excess energy for later use makes it an essential tool for maintaining a stable and reliable energy grid.

(3) Environmental Benefits: BESS are used as localized peaking power suppliers. As such, BESS will help reduce air quality impacts of high emitting peaker plants which are called-on as resources of last resort during peak demand. Further, to achieve its renewable energy goals, Connecticut is relying in part on the installation of a substantial amount of energy storage to balance the grid and “smooth” the intermittent output of solar and wind generation resources. The adoption of renewable power can only happen effectively with energy storage to assist the grid in accommodating the added resources. Locally, the host Site’s environmental footprint will improve since the BESS will charge at night when the ISO-NE’s power supply is comprised of a higher percentage of non-carbon-based resources, and then discharge that energy to serve the facility and grid during peak demand hours when the high emitting, least efficient, fossil fuel-based Peaker plants are typically used. The result is overall positive net value to the host and all ratepayers as sought in the PURA and CTGB’s ESS Program.

3.4 Project Equipment

The major equipment that makes up this facility are the battery enclosures which store the electricity, inverters that change the electricity from Direct Current to Alternating Current, and Transformers that change the electrical voltage between the output of the inverters and the utility grid. The major electrical equipment will be mounted atop concrete pads, piles or another equivalent engineered design. Additionally, the proposed Project area consists of a gravel ring road and interior gravel access roads to provide maintenance access to all equipment on site. See Exhibit A – Environmental Assessment Report, Appendix A – Project Plans and Exhibit B – Equipment Specifications.

3.5 Interconnection

The 15 MW Project will consist of two 7.5MW interconnections to the United Illuminating distribution system. There will be two 13.8 kV interconnection services connecting to the existing UI Elmwest Substation to the east of and immediately adjacent to the Project Site. Each new service will require the installation pad mounted equipment such as: disconnects, reclosers, metering, gang operated switches, fused disconnects, etc. See Exhibit G – Single Line Diagram. The interconnection infrastructure needed to connect to the distribution grid is based on guidelines and requirements governed by ISO-NE and UI. The two express feeders will exit the Project Site to the east and be routed to an open breaker position within Elmwest Substation. See Exhibit A, Appendix A – Site Plan Set

The Project filed an interconnection request on June 28, 2021, with United Illuminating (“UI”) and has been assigned interconnection queue number U31064. The Project executed a Feasibility Study Agreement with UI on January 6, 2022. The Project received the results of this report July 7, 2022 and then entered a Distribution System Impact Study on August 1,

2023. The Distribution System Impact Study was finalized on August 1, 2024. The Transmission System Impact Study Agreement was signed on May 29, 2024 and is expected to be finalized in Q2 2025. The Facility Study will start shortly thereafter the completion of the Transmission System Impact Study.

3.6 Public Notice and Outreach

East Point Energy has been in regular communication with local officials regarding the development of the Project. Since 2020, the Petitioner has maintained ongoing engagement with the City of West Haven. The most recent interaction took place on December 17, 2024, when East Point Energy hosted a Community Meeting at the West Haven Public Library to provide updates on the Project. Invitations to the Community Meeting were sent to community members, adjacent property owners, and government officials. The meeting included a presentation about the Project and a question-and-answer session. Information summarizing the Petitioner's public outreach effort is included in Exhibit C – Public Outreach Documentation.

In addition, pursuant to the requirements of R.C.S.A. § 16-50j-40(a), the Petitioner sent notice concerning this Petition to all abutters and applicable governmental officials by Certificate of Mailing.

SECTION 4 No Substantial Adverse Environmental Effects

4.1 Environmental Assessment Report

The Project will comply with the air and water quality standards of CTDEEP. Further, it will not have an undue adverse effect on the existing environment and ecology; nor will it affect the scenic, historic and recreational resources in the vicinity of the Project.

Once operative, the Facility will be unstaffed and generate minimal traffic. Any noise generated by the Project will meet applicable State and local standards.

The Project location has two existing buildings along the eastern boundary. Most of the undeveloped areas are paved or gravel, with some vegetation in the north and southwest. Timber matting and fill piles are present in the northwest portion of the Property, associated with on-going transmission line work. Development of the Project will have no significant impact on existing habitats and wildlife. See Exhibit A – Environmental Assessment Report, Section 3.4

The Project will have no material effect on prime farmland soils and or core forest. See Exhibit A – Environmental Assessment Report, Section 3.6.1

The Petitioner will implement a Stormwater Pollution Control Plan ("SWPCP"), in accordance with the 2024 Connecticut Stormwater Quality Manual and the 2024 Connecticut Guidelines for Soil Erosion and Sediment Control, that includes provisions for monitoring of development activities and the establishment of E&S controls to be installed and maintained throughout construction.

After its useful life, the Facility will be decommissioned and the Project Area restored. Upon decommissioning, the Petitioner will not rebuild the metal and concrete buildings referenced above.

4.2 Air Quality

No air emissions are generated during operation of the BESS Facility. Therefore, the operation of the Facility will have no adverse effects on air quality and will comply with applicable air standards. See Exhibit A – Environmental Assessment Report, Section 3.1

4.3 Water Resources

The Facility is not located in a Wetland or Floodplain area, nor will it have adverse impacts on water resources or quality. See Exhibit A – Environmental Assessment Report, Sections 3.2-3.3

4.4 Stormwater

The Project has been designed to meet the 2024 Connecticut Stormwater Quality Manual and 2024 Connecticut Guidelines for Soil Erosion and Sediment Control. Combined, these address three (3) main concerns: stormwater runoff peak attenuation, water quality volume treatment, and E&S controls. The Project has been designed to disturb less than one acre of land and, as such, no DEEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities is required. A summary of these results is provided in Exhibit A – Environmental Assessment Report, Section 3.3.3.

4.5 Habitat and Wildlife

The Project will have no significant adverse effect on wildlife or its habitat at or near the Property. A report on the Habitat and Wildlife is provided within Exhibit A – Environmental Assessment Report, Sections 3.4-3.5.

4.6 Prime Farmland and Core Forest Resources

The Project will not have an impact on Prime Farmland or Core Forest Resources. The nearest core forest is located ± 0.83 miles to the east. There is no core forest located on the Property. Similarly, there are no Prime Farmland soils.... See Exhibit A – Environmental Assessment Report, Section 3.4.3.

4.7 Cultural and Historical Resources

The Petitioner requested comments regarding the Project from the Connecticut State Historic Preservation Office (“SHPO”). The SHPO confirmed that no historic properties will be affected by the proposed development and no additional archeological investigations are warranted. See Exhibit A – Environmental Assessment Report, Section 3.7, Appendix C, SHPO Consultation.

4.8 Noise Assessment

A sound barrier will be installed around all sides of the BESS equipment, excluding the northern boundary, to provide adequate sound mitigation for compliance with all applicable CT State and City of West Haven noise standards. Background noise associated

with the bordering railroad to the north and Elm Street to the south is present year-round. Elm Street serves as a connector from the Metro North Train Station to Interstate-95 with the closest on/off-ramp approximately 1.1 miles to the east of the Property. See Exhibit A – Environmental Assessment Report, Section 3.10, Appendix E, Noise Assessment.

4.9 Visual Impact

The proposed BESS Facility components and equipment will not be visible from Elm Street to the south or any of the adjacent parcels to the south, east and west. The sound barrier will be visible from portions of the surrounding area. The incremental visual impact of the Project will be minor due to the highly developed urbanized setting. See Appendix D – Visual Renderings.

4.10 Hazardous Materials

A site-specific construction health and safety plan is typically developed prior to initiation of any construction related activities. During the construction phase of development, all contractors, subcontractors and personnel will be appropriately trained and briefed on any potential site health and safety issues. There will always be a designated construction manager, site safety officer, and/or similar representative present during construction, and that individual will be responsible for overseeing and implementing the site construction health and safety plan. Some hazardous substances may be used or stored on the Property during construction or operation of the Project. These include but are not limited to the following: Refrigerant Gas, Rechargeable Li-ion Battery System, Rechargeable Lithium-ion Battery Module, Rechargeable Prismatic Lithium-ion Cell, and Ultra Long-Life Coolant. A Spill Prevention, Control, and Countermeasure (“SPCC”) Plan, and an Operations and Maintenance (“O&M”) Plan will be developed for the Project. See Exhibit D - Material Safety Data Sheets (MSDS).

SECTION 5 Project Construction, Operation, Maintenance and Decommissioning

5.1 Permits Required

Permits required for the proposed Project outside of this Connecticut Siting Council Petition include building and electrical permits from the City of West Haven.

5.2 Construction

If approved by the Council, the Petitioner anticipates that construction of the Project will begin in summer 2026 and will take approximately twelve (12) months to complete. Construction activities within the Project Site will include soil erosion and sedimentation control measures, installing foundation and or equipment footings, racking and module(s) electrical trenching; the installation of interconnection infrastructure; and new access road construction. Existing grades throughout the Project Site will remain largely unchanged, except in areas of long-term stormwater management or where the Project’s erosion and sediment control measures are proposed. For those areas, some temporary regrading (i.e., cuts/fills) may be required.

Initial work would involve the installation of erosion and sediment control measures, including installation of sediment traps, and construction of access roads. It is anticipated that temporary staging areas would be in open areas of the Project Site. Final site stabilization, testing, and commissioning would be expected to be completed towards the end of 2027. Construction activities would be expected to occur 7:00AM to 6:00PM Monday through Friday and Saturday between the hours of 8:00 a.m. and 5:00 p.m. but may occur outside of these hours to meet Project needs and deadlines.

5.3 Traffic

Construction traffic would include standard construction trucks, small earth moving equipment, and an all-terrain forklift. Vehicle trips would be related to scheduled deliveries of the major materials such as battery housing or electrical equipment and fencing materials to be installed around the perimeter of the Facility. Once construction is complete and the BESS Facility is operational, traffic will be limited to routine inspection and maintenance visits to the Project Site. Limited deliveries of spare parts and unplanned maintenance may also take place.

5.4 FAA Determinations

The Petitioner utilized the Federal Aviation Administration (“FAA”) Notice Criteria Tool, which confirmed that no notification to the FAA is required for the Project. The nearest airport is the Tweed New Haven Airport located in East Haven, more than three miles southeast of the Property. See Exhibit A – Environmental Assessment Report, Section 3.12, Appendix F - FAA Consultation.

5.5 Operations and Maintenance

The required maintenance of the Project will be minimal. Vegetation management will be conducted as needed based on visual inspections of the growth within the Project Area. Routine maintenance of the electrical equipment will typically occur two to three (2-3) times per year and will typically involve two (2) technicians. The Facility will be monitored remotely 24 hours a day, 7 days a week. Repairs to the BESS Facility components will be made on an as-needed basis as outlined in the O&M Plan that will be shaped in large part by the standard original equipment manufacturer’s Operation & Maintenance Documentation.

5.6 Decommissioning Plan

At the end of its useful life, the Project will be decommissioned in accordance with the Project’s Decommissioning and Restoration Plan which will be shaped in large part by the standard decommissioning plan provided by the battery’s original equipment manufacturer. The Project’s Decommissioning and Restoration Plan is included in Exhibit E – Project Decommissioning Plan.

5.7 Safety

5.7.1 Site Security and Safety

The Project is not expected to create any adverse impact on public health or safety issues. The Project will meet or exceed all appropriate health and safety standards and requirements. During construction and post-construction operations and maintenance, workers and personnel will follow relevant health and safety standards applicable to battery energy storage facilities.

A site-specific construction health and safety plan will be developed prior to initiation of any on-site construction activities. During the construction phase of development, all contractors, subcontractors and personnel will be appropriately trained and briefed on any potential site health and safety issues. There will always be a designated construction manager and/or site safety officer or representative present during construction, and that individual will be responsible for overseeing and implementing the site construction health and safety plan.

Some hazardous substances may be used or stored on the Property during construction or operation of the Project such as Coolant for the HVAC units or for cooling the battery modules. The MSDS for these substances can be found in Exhibit D - Material Safety Data Sheets (MSDS). A Spill Prevention, Control, and Countermeasure ("SPCC") Plan and an Operations and Maintenance ("O&M") Plan will also be developed for the Project. Lastly, the Project, once operational, will contain remote monitoring of the facility and a 7-foot-tall (minimum) security fence or 20-foot-tall sound barrier around the perimeter.

5.7.2 Electric and Magnetic Fields

Electric and magnetic fields ("EMF") from storage facilities are not a cause of concern to the industry, since static fields are produced by battery banks and DC cabling.

During operation, EMF from the Project will derive from: 1) the DC battery banks; 2) the DC cables connecting the battery banks to the power inverters; 3) the AC power inverters that convert the DC power to AC power; and 4) the 13.8-kV AC underground connecting Project to the existing service in the customer's electrical room. There will be no additional EMF from the existing utility interconnection.

The battery banks and DC cables on site will produce static fields (i.e., at 0 Hertz). These sources will not be expected to produce any significant disturbance to the existing levels of static magnetic field produced by natural sources within the earth (i.e., the earth's geomagnetic field) away from the Project location. The existing level of the earth's static geomagnetic field is about 8,000 times lower than the standard for exposure of the general public to static magnetic fields recommended by the International Commission on Non-ionizing Radiation Protection.

The power inverters, above ground and underground AC lines on site will produce AC fields at frequencies greater than 60 Hz on site. These higher-frequency fields from the inverters, like the DC fields from the battery banks, decrease rapidly to low levels within a few tens of feet or less. These components are located significantly far from any potentially affected receptors and thus will not be an important contributor to AC fields outside the Project boundaries. Additionally, electric fields are blocked (i.e., shielded) by most grounded conducting objects, including buildings, walls, trees, and fences.

5.7.3 Fire Safety

The Petitioner has met with local fire officials and emergency responders to discuss incident protocols for the Project Site. Before construction begins, the Petitioner will arrange for the Energy Safety Resource Group (ESRG) to provide technology-specific training for local first responders and develop a comprehensive Emergency Response Plan tailored to the Facility. Site access for emergency responders will be ensured, and the entire facility can be safely shut down, remotely, in case of a fire or emergency. The Petitioner is coordinating with both local emergency response and the Original Equipment Manufacturer

(OEM) (Sungrow) to finalize a site-specific Draft Emergency Response Plan. Appendix E – Draft Emergency Response Plan.

5.7.4 Fire Response

The entrance to the Facility will be gated—limiting access to the BESS Facility by authorized personnel only—and all emergency response personnel will be provided via a Knox Pad lock. Importantly, the Petitioner notes that the Facility will be monitored remotely from off-site.

SECTION 6 Conclusion

As demonstrated by this Petition, the Project will comply with the standards set forth in Conn. Gen. Stat. §16-50k(a). Specifically,

- The Project meets CTDEEP's air and water quality standards, with no material emissions associated with construction or operation, and water quality standards associated with construction and operational stormwater management are a primary focus of the Project's design.
- The Project will not impact any wetlands or watercourses or rare/endangered species
- The Project will not materially alter areas of core forest or active prime farmland.
- The Project will be screened from the surrounding residential properties and roadways by a sound barrier.

Given the benefits this Project will provide to the State of Connecticut, the Petitioner respectfully requests that the Council approve the Petition as currently proposed and issue a declaratory ruling as requested.

List of Exhibits

Exhibit A – Environmental Assessment Report

Exhibit B – Equipment Datasheet

Exhibit C – Public Notice and Outreach

Exhibit D – Material Safety Data Sheets

Exhibit E – Decommissioning Plan

Exhibit F – Draft Emergency Response Plan (ERP)

Exhibit G – Single Line Diagram

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