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September 22, 2025

VIA ELECTRONIC FILING AND EXPRESS OVERNIGHT DELIVERY

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

Re: Petition No. 1676 - Homestead Fuel Cell 1, 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 grid-side 7.5-megawatt fuel cell facility and associated equipment located at 235 Brainard Road, Hartford, Connecticut, and associated electrical interconnection.

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council ("Council") are the responses of Homestead Fuel Cell 1, LLC to the Council's September 9, 2025 interrogatories.

An original and fifteen (15) copies of this filing will be sent to the Council via express overnight delivery.

Should the Council have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

Bruce L. McDermott

Enclosures

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Q-CSC-1: Has Homestead Fuel Cell 1, LLC ("HFC1") received any comments since the petition was submitted to the Council? If so, please summarize the comments and how these comments were addressed.

A-CSC-1: HFC1 has not received any comments since the petition was submitted to the Council.

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Q-CSC-2: Describe outreach efforts to each member of the State legislature whose district encompasses the proposed facility site.

A-CSC-2: HFC1 has not made outreach efforts to any member of the State legislature.

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Q-CSC-3: What is the estimated cost of the proposed project?

A-CSC-3:

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Q-CSC-4: Is the project, or any portion of the project, proposed to be undertaken by

state departments, institutions or agencies, or to be funded in whole or in

part by the state through any contract or grant?

A-CSC-4: No.

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Q-CSC-5: Referencing Petition p. 5, how is the supply of natural gas to the site different than for the Petition No. 1458 site?

A-CSC-5: For the project at this location, CNG has confirmed that there is a gas main on Brainard Road running at 150psi to which the project may connect.

As design work moved forward for the original site presented in Petition 1458 (441 Homestead Avenue, Hartford), it was determined that installation of the gas supply line from the nearest natural gas connection with satisfactory flow capacity and pressure would require over two miles of 8" HDPE gas main in road or under sidewalk from Capital Avenue to the Homestead Avenue fuel cell site.. In addition, the gas utility required that the two existing mains on the Woodland Street bridge be modified by separating piping on bridge be modified to use one for the fuel cell installation.

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Q-CSC-6: Referencing Petition p. 6, "all other aspects of the Project will remain the

same as originally proposed in Petition No. 1458"; however, the energy

output is reduced. Clarify.

A-CSC-6: The project described in Petition 1458 and this project were both designed

to use FuelCell Energy 3000 fuel cells. However, since 2021, when Petition 1458 was submitted, and the present time, the fuel cell units have

been derated, which allows for a longer operating life for the modules.

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Pursuant to CGS §16-50o, submit a copy of the lease for the proposed facility site. Any confidential/proprietary information, such as financial Q-CSC-7:

terms, may be redacted.

Please see Exhibit CSC-7-1. A-CSC-7:

Q-CSC-8: Would the proposed facility be enclosed by a fence? Provide the design

specifications of the proposed fence.

A-CSC-8: The design specification for the fence will be shown on the site plans. It is expected that the fence selected will be consistent in style and height with

the existing fences on this and other MDC properties. Pictures of the

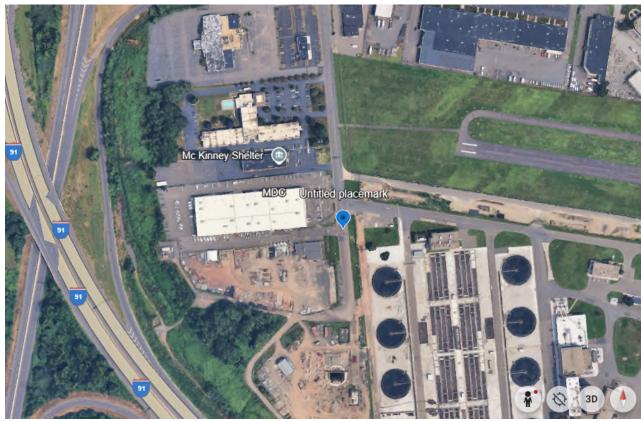
existing fences are shown below.





West side of Brainard Road looking south from the NE corner of the project site down the east boundary

East side of Brainard Road Looking east across Brainard Road from the NE corner of the project site.



Approximate location of camera for above pictures.

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Q-CSC-9: What is the use of C-1 identified on Figure 5 of the Petition? What is the distance from the nearest portion of the proposed facility to C-1?

distance from the flearest portion of the proposed facility to 0 1:

A-CSC-9: Please refer to the Petition's Exhibit F, Facility Sound Assessment. Location C-1 is identified as a commercial receptor in the computer model, at the location of the Best Western Hartford Inn and Suites on Brainard Road north of the site (Exhibit F, p. 7). The results are summarized in Table 3 (p. 9).

This point is about 550 feet north of the project site.

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Q-CSC-10: Is the site located within an Environmental Justice Community?

A-CSC-10:

The City of Hartford is classified as a "distressed municipality" which makes the entire city an environmental justice (EJ) community as defined in the CGS Section 22a-20a. The proposed fuel cell facility at 235 Brainard Road is also located within a 2024 Environmental Justice Block Group according to review of CTDEEP's online Environmental Justice Communities mapping tool on 9/9/2025.

"Affecting facilities" include, among other types of facilities, an electricgenerating facility with a capacity of more than 10 megawatts. The proposed fuel cell facility is a 7.5 MW electric-generating facility, and, therefore, below the threshold for an affecting facility.

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Q-CSC-11: Referencing page 10 of the Petition, what is the status of the ISO-

New England interconnection review?

A-CSC-11: Eversource has advised that the project will be included in the 2026

cluster of projects for the Transmission Impact Study.

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Q-CSC-12: Would the interconnection of the proposed facility require any substation upgrades? Explain.

A-CSC-12: An export from the Eversource ArcGIS website is included below. The application (7.41MW) exceeds the available Location Hosting Capacity (3.60MW) for the proposed interconnection circuit. Eversource is working on their system and transmission impact studies. When these studies are completed, Eversource will advise HFC1 of any required substation upgrades. HFC1 is anticipating that upgrades may be required based on the information available at this time.

Location Hosting Capacity(MW)	3.60
Section ID	352306692
Operating Voltage (kV)	23
Circuit Name	130
Bulk Circuit Name	130
Distribution Substation Name	N/A
Distribution Substation Voltage(kV)	N/A
Distribution Substation Rating (MVA)	
Bulk Substation Name	1A SOUTH MEADOW
Bulk Substation Voltage(kV)	115/23
Bulk Substation Rating (MVA)	152.00
Bulk Sub Hosting Capacity(MW)	152.00
Circuit DER Online(kW)	6631.00
Circuit DER In Queue(kW)	1178.00
Current ASO Studies	None
Circuit Feeds Secondary Network Customers	N
Circuit Rating (Amp)	377.00
3V0 Status	N
Date Last Updated	02/14/2025, 01:57 PM

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Q-CSC-13: What security measures would be employed to protect the fuel cell units/components from trespass, theft, vandalism or intrusion?

A-CSC-13: The site will be monitored with a remote tv camera, monitored from the FCE Global Management and Control Center (GMCC) in Danbury, Connecticut. A security fence will be set on the boundaries of the site (please see the response to Question No. 8). Personnel access gates, both for equipment and for personnel, will be secured with padlocks at all times when authorized personnel are not present.

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Q-CSC-14: Will the operation of the fuel cell facility produce any type of vapor plume or cloud? If so, is there a potential for icing in colder temperatures and/or a potential to interfere with air navigation? If so for both, are there any mitigation measures?

A-CSC-14: Water vapor, which represents less than 20% of the stack exhaust by volume, may be visible as a plume when the high-temperature exhaust (approximately 700F) falls below the dew point temperature, which is approximately 135F. However, experience shows that for the vast majority of the year this plume dissipates rapidly into the surrounding air before a visible plume can be observed. When it is very cold, the exhaust can cool more rapidly allowing the plume to be visible for a small distance around the exhaust stack prior to dissipating. Even in the rarer conditions when it is cold with a high relative humidity, the plume does not extend significantly such that it would be highly visible or Likewise, no instance of icing related to interfere with visibility. condensation of exhaust vapors has been noted in operating facilities in and outside of Connecticut, and any icing that has been observed at FCE sites has been related to the freezing of rain, snow melt or municipal water, and unrelated to exhaust vapor condensation.

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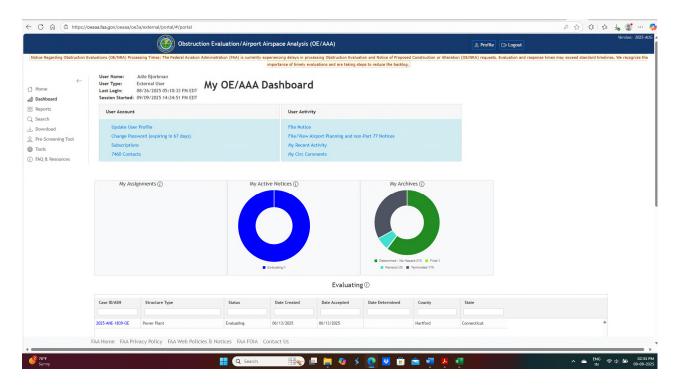
Q-CSC-15: Referencing Petition p. 23, what is the status of the FAA Aeronautical

Study?

A-CSC-15: The status of the FAA Aeronautical Study No. (ASN) 2025-ANE-1839-

OE for the proposed fuel cell facility power plant (initially filed with FAA on 6/13/2025) is denoted as "evaluating" per the FAA OE/AAA (Obstruction Evaluation / Airport Airspace Analysis) login portal. See

screenshot below:



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Q-CSC-16: Would lighting be used on site? If so, for what purpose and what type

would be installed (e.g motion activated, preset timer...)?

A-CSC-16: Since the site will be remotely operated and unmanned during normal

operation, permanent lighting will not be in operation. However, light poles will be located to provide low-level area lighting suitable for safe travel for plant service personnel who may be on site at night. Lighting will have switches located at man-gates to allow the field service crew to

turn lighting on and off at night.

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Q-CSC-17: Would the construction or operation of the proposed facility impact or interfere with any existing utilities or infrastructure within the project site? If so, identify any measures that would be employed to protect existing utilities or infrastructure from impact or interference.

A-CSC-17: The layout of plant units has been set to avoid an existing electrical right-of-way that runs through the site and will not impact the existing storm drains shown on the site survey.

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Q-CSC-18: Would construction of the facility interfere with vehicular access within

the The Metropolitan District parking lot and driveways? How would this

be managed?

A-CSC-18: It is expected that primary construction vehicle access would be from the

access road on the southeastern corner of the site. Delivery of the fuel cell modules and fabricated equipment skids would be from Brainard Road on the east side of the site. Deliveries of the equipment by large heavy-haul coordinated with the operations of the MDC. Lifting and rigging equipment for these loads would be located within the project site

boundary (Laydown Area).

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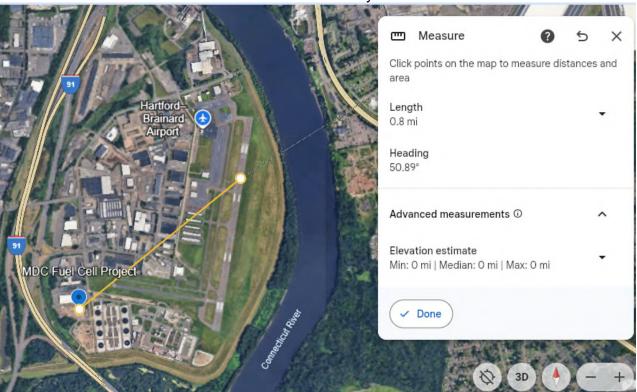
Q-CSC-19: Referencing Petition p. 23, Brainard Airport is 0.8 miles northeast of the site. What is that measurement to? What is the distance from the

nearest portion of the proposed site to the nearest portion of the

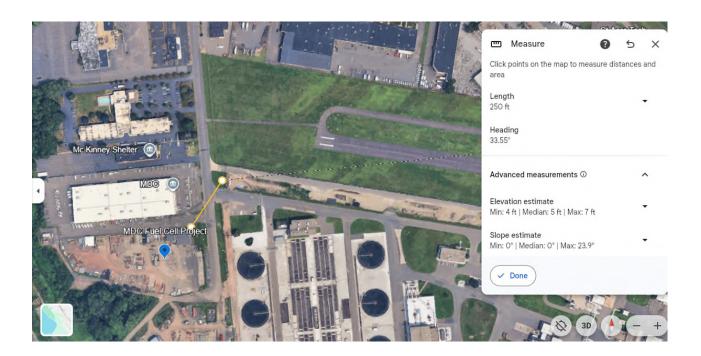
Brainard Airport property?

A-CSC-19: This measurement was taken from the center of the project site to the

center of the airfield's eastern runway.



The distance from the nearest portion of the site (its northeast corner) to the nearest portion of the Brainard Airport property (its southwest corner on Brainard Road) is 250 ft.



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Q-CSC-20: Which National Fire Protection Association (NFPA) or other codes and

standards apply to fuel cell construction, installation and/or

modifications?

A-CSC-20: FCE has certified its fuel cell power systems to the requirements of ANSI/CSA FC 1:2021 Fuel Cell Power Systems.

This ANSI Standard specifies that installation shall be done in accordance with NFPA 853.

The Electrical Balance of Plant (EBOP) will be certified, listed, and labeled in accordance with the requirements of UL 1741 Inverters, Converters, Controllers, and Interconnection System Equipment for use with Distributed Energy.

The installation of the system will also comply with other applicable NFPA Codes, including:

NFPA 30 Flammable and Combustible Liquids Code

NFPA 51B Standard for Fire Prevention During Welding, Cutting, and Other Hot Work

NFPA 54 Natural Fuel Gas Code

NFPA 55 Compressed Gases and Cryogenic Fluids Code

NFPA 70 National Electrical Code (NEC)

NFPA 79 Electrical Standard for Industrial Machinery

NFPA 780 Standard for the Installation of Lighting Protection Systems

NFPA 853 Standard for the Installation of Stationary Fuel Cell Power Systems

NFPA 101 Life Safety Code

Other applicable codes and standards are:

American National Standards Institute, Inc (ANSI)

ANSI C84.1. National Standard for Voltage regulation requirements

ANSI Z535 – Safety Alerting Standards

ANSI Z535.1 – Safety Color Code

ANSI Z535.2 – Environmental and Facility Safety Signs

ANSI Z535.3 – Criteria for Safety Symbols

ANSI Z535.4 – Product Safety Signs and Labels

ANSI Z535.5 – Safety Tags and Barricade Tapes (for temporary hazards)

ANSI Z535.6 – Product Safety Information

Federal Communications Commission (FCC)

Title 47CFR15

California Rule 21

Institute of Electrical and Electronic Engineers (IEEE).

IEEE 519 -1992: Recommended Practices and Requirements for Harmonic Control in Electrical Power Systems

IEEE 518 -1982 Guide for the Installation of Electrical Equipment to Minimize Electrical Noise

IEEE 1547 Standard for Interconnecting Distributed Resources with Electric Power Systems

IEEE 1547.1 Conformance Test Procedures for Equipment Interconnecting Distributed Resources with Electric Power Systems

IEEE C62.45 – Recommended Practice on Surge Testing for Equipment Connected to Low-Voltage (1000V and less) AC Power Circuits

IEEE C57.12.01 Standard General Requirements for Dry-Type Distribution and Power Transformers Including Those with Solid Cast and/or Resin Encapsulated Windings

IEEE 141–1993 (R1999) Recommended Practice for Electric Power Distribution for Industrial Plants

IEEE 142-2007 Recommended Practice for Grounding of Industrial and Commercial Power Systems

IEEE 383 Vertical Wire Flame Test.

International Electrical Committee (IEC).

IEC 60664-1 Insulation Coordination for Equipment within Low-Voltage Systems – Part 1 Principles, Requirements and Tests.

National Electrical Manufacturers Association (NEMA)

NEMA 250 – 2003 Ratings for Industrial Enclosures for Electrical Equipment (1000 Volts Maximum).

NEMA ICS-1 Industrial control for system design.

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Q-CSC-21:

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/whitepprFINAL20091009114810pdf.pdf.

A-CSC-21:

The proposed FuelCell Energy facility has been designed to fully comply with the Connecticut Siting Council's White Paper on the Security of Siting Energy Facilities. The facility prioritizes physical security, environmental protection, and public safety while supporting Connecticut's clean energy goals.

1. Physical Security Measures

FuelCell Energy's facility will implement robust physical security systems to deter and respond to potential threats:

- Controlled access points with secure fencing and surveillance.
- Real-time monitoring systems are integrated with remote alert capabilities.
- Coordination with local law enforcement and emergency responders for incident management.
- Secure storage and handling of hydrogen and other fuel cell components.

2. Site-Specific Risk Assessment

A detailed risk assessment, Facility Assessment Security Tool (FAST), will be conducted, including:

- Evaluation of site-specific threats and vulnerabilities.
- Flood zone mapping and FAA hazard review (if applicable).
- Land use compatibility and visual impact analysis.
- Tree clearing and erosion control plans to minimize ecological disruption.

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Q-CSC-22: Provide the total area (in acres) of the limits of disturbance for

construction of the proposed facility.

A-CSC-22: Please refer to Exhibit A, Site Plan. The total area for construction

(Laydown Area) is 0.97 acres. This area is the permanent plant area plus the temporary laydown area for construction activities. When construction is completed, the plant operating area (Lease Area) will be

0.76 acres.

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Q-CSC-23: Referencing Petition pp. 16-17, there is reference to the 2023 Guidelines

for Soil Erosion and Sediment Control and 2023 Connecticut Stormwater Quality Manual. Would the proposed development comply with the 2024

versions?

A-CSC-23: Yes, this requirement will be incorporated into the site design

requirements

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Q-CSC-24: Has HFC1 received a response from SHPO?

A-CSC-24: Yes. In a letter dated July 9, 2025, the Connecticut State Historic

Preservation Office (SHPO) advised that, in their opinion, no historic properties would be affected by the project. A copy of this letter was

sent to the Siting Council on July 15, 2025.

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Q-CSC-25: Please provide a detailed site plan for the proposed facility including but not limited to, the dimensions and location of the proposed fuel cell

facility, cooling module, concrete pads, fence design and bollards (if

applicable) and utility connections.

A-CSC-25: The detailed site plan with the dimension and specification information and utility connection details requested is in preparation. Although this

drawing is not available for issue at this time, it will be issued to the Siting Council when it is completed. Please note that the fuel cell project does

not have a cooling module.