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March 18, 2026

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Via Hand Delivery and Electronic-Mail

Ms. Melanie Bachman
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition No. 1699 – SMS CT MG02A, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 1.93-megawatt AC battery energy storage facility and associated equipment to be located at Guilford High School, 605 New England Road, Guilford, Connecticut, and associated electrical interconnection

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council ("Council") are SMS CT MG02A, LLC's responses to the Council's first set of interrogatories dated March 11, 2026. An original and fifteen (15) copies of this filing will be hand delivered to the Council.

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

Very truly yours,

Bruce L. McDermott

Enclosures

Interrogatory CSC 1

Q-CSC 1: Referencing Petition p. 9, when did SMS CT MG02A, LLC (SMS) meet with the Town of Guilford (Town), the Guilford Fire Department (GFD) and Guilford High School (GHS) to discuss the proposed facility? Provide the approximate meeting dates, topics discussed and how any comments/concerns were addressed.

A-CSC 1: SMS met with the Town on October 25, 2025 and has a follow-up site plan review meeting scheduled for March 24, 2026 because the battery's location has been moved since the last meeting. The prior discussion covered the battery's location, the impact on trees, the placement of the fence and bollards, and the understanding that the site serves as an emergency shelter, which makes the battery a valuable asset to the school. SMS also addressed the need for an emergency shut-off within the enclosure and the specifics of remote monitoring.

Interrogatory CSC 2

Q-CSC 2: Has SMS received any comments since the Petition was submitted to the Council? If yes, summarize the comments and how these were addressed.

A-CSC 2: No comments have been received.

Interrogatory CSC 3

Q-CSC 3: 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?

A-CSC 3:

a) Although it is not necessary for the reliability of the electric power supply of the state, the Facility will strengthen the electric power supply by removing load.
b) Although not necessary for the development of a competitive market for electricity, the Facility will provide significant savings for the school.
c) The BESF will reduce the need for generation by load shifting. The BESF will charge during off peak times and reduce grid load during peak times. The BESF will also receive dispatch requests from Eversource to export energy to the grid during times of high energy usage (demand response).
d) Yes.
e) Yes, distributed generation is an essential part of the electrical generation mix in the state. Batteries perform many functions such as store excess energy, provide frequency regulation, offer backup power, and enable peak shaving, enhancing grid reliability and accelerating the integration of renewable energy sources.
f) Yes. The BESF increases reliability by reducing loads on the grid and providing additional backup power to the school and emergency shelter on site.
g) No.

Interrogatory CSC 4

Q-CSC 4: Referencing page 4 of the Petition, when was the proposed facility selected as part of the Energy Storage Solutions (ESS) program?

A-CSC 4: The facility was selected as part of the ESS program in June 2024.

Interrogatory CSC 5

Q-CSC 5: Referencing page 8 of the Petition, in what potential available energy markets would SMS participate?

A-CSC 5: The CT ESS program limits participation to just the ESS program. As of now, the project is anticipated to only participate in the ESS program and provide utility bill savings to Guilford High School.

Interrogatory CSC 6

Q-CSC 6: Is the facility, or any portion of the facility, 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 6: No.

Interrogatory CSC 7

Q-CSC 7: If SMS transfers the facility to another entity, would SMS 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?

A-CSC 7: SMS will provide the Council with the agreement regarding the outstanding conditions and quarterly assessment charges including contact information.

Interrogatory CSC 8

Q-CSC 8: Is the proposed site located within an environmental justice community?

A-CSC 8: No.

Q-CSC 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”?

A-CSC 9: The battery microgrid is providing backup power to the high school. This is critical as the high school is also an emergency shelter for the town.

Interrogatory CSC 10

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Q-CSC 10: Referencing Petition p. 6, what is the address of the nearest residential property located approximately 153 feet to the east of the site?

A-CSC 10: 54 Long Hill Farm, Guilford, CT 06437.

Interrogatory CSC 11

Q-CSC 11: Please provide the following:

a) Distance from the BESF perimeter fence to nearest property line;
b) Distance, direction and address from the BESF perimeter fence to the nearest residential structure;
c) Distance from the BESF perimeter fence to nearest GHS building;
d) Distance from the nearest part/corner of the battery container to the nearest property line;
e) Distance from the nearest part/corner of the battery container to the nearest residential property line, if the nearest property line referenced above is not residential; and
f) Distance from the nearest part/corner of the battery container to the nearest residential structure.

A-CSC 11:

a) 130’
b) 250’ southwest of battery fence. 54 Long Hill Farm, Guilford, CT 06437
c) 85’
d) 153’
e) 153’
f) 270’

Interrogatory CSC 12

Q-CSC 12: Referencing Petition, Supplemental Submission dated December 30, 2025, Sheet SU-1, provide the length and width of the fence BESF facility compound.

A-CSC 12: 39’ x 21’.

Interrogatory CSC 13

Q-CSC 13: Referencing Petition Supplemental Submission dated December 30, 2025, Sheet SU-1, what is the proposed final surface within the fenced BESF compound, e.g. crushed stone, lawn, asphalt? Explain.

A-CSC 13: The battery and electrical gear will sit on concrete pads. The working space/drive aisle will be compacted gravel.

Interrogatory CSC 14

Q-CSC 14: Referencing Petition Supplemental Submission dated December 30, 2025, Sheet SU-1, provide the length of the proposed 8-foot wide utility access drive in linear feet. Would this access drive be gravel or paved (asphalt)? Explain.

A-CSC 14: 29'. The access drive is planned to be crushed gravel.

Interrogatory CSC 15

Q-CSC 15: Referencing Petition Supplemental Submission dated December 30, 2025, Sheet SU-1, provide the dimensions (length and width) of the proposed rectangular fenced BESF compound.

A-CSC 15: 39’ x 21’.

Interrogatory CSC 16

Q-CSC 16: Provide the number of battery racks for the battery storage unit, the number of battery modules per battery rack and the number of battery cells per battery module.

A-CSC 16: There are 8 battery bays (vertical towers) per unit and each bay contains 3 battery modules arranged on horizontal shelves. Each module contains 336 prismatic lithium-ion cells, totaling 8,064 cells for a fully populated 24-module unit.

Interrogatory CSC 17

Q-CSC 17: Referencing Petition Exhibit B, why was the Tesla Megapack 2XL BESF selected for this facility?

A-CSC 17: The Tesla Megapack 2XL BESF has deployed systems with billions of safe cell-hours of operation. The Megapack 2 XL utilizes Lithium Iron Phosphate (LFP) chemistry, which offers higher thermal stability and resists thermal runaway propagation better than standard nickel-based alternatives. Additionally, the system achieves a best-in-class round-trip efficiency of up to 92%.

Q-CSC 18: Provide a summary of the available battery technology types and explain why each technology type could or could not be implemented at the proposed site. For reference, please see the response to Interrogatory No. 5 to the Council's Petition 1637 Set 2 Interrogatories at the following link: KCE CT 11_ LLC Final Responses to Second Set Interrogatories for Petition No. 1637(20032265.1).

A-CSC 18: The following summary provides an update based on the current market status in 2026. While several alternative technologies are advancing, Lithium Iron Phosphate (LFP) - the technology implemented for this project - remains the only viable choice for the proposed site due to its unique balance of maturity, safety, energy density, and commercial bankability.

1. Sodium-Ion (Na-ion)

Sodium-ion technology has reached a critical inflection point, with commercial production of second-generation cells beginning in 2025. Large-scale utility deployments are appearing, primarily in China, and domestic manufacturing capacity in the U.S. is scaling.

- Why it cannot be implemented at this site:
  - Energy Density: Despite improvements, Na-ion still averages 160–200 Wh/kg, significantly lower than the 250+ Wh/kg typical of LFP systems. Implementing Na-ion for a 1.93 MW system would require a physical footprint approximately 30-50% larger than the proposed design.
  - Bankability: While "usable" in niche markets, Na-ion supply chains are less mature than Li-ion, making long-term service agreements and project financing for standalone projects in the U.S. challenging compared to the proven Tesla Megapack 2 XL platform.

2. Iron-Air (Fe-Air)

Fe-air batteries have successfully transitioned from pilot programs to their first major commercial grid deployments, such as the 300 MW / 30 GWh multi-day storage system in the Upper Midwest.

- Why it cannot be implemented at this site:
  - Duration Mismatch: Fe-air is specifically designed for multi-day discharge (100+ hours). This project requires short-duration high-power output (typically 2–4 hours) for grid support, for which Fe-air's slow charge/discharge kinetics are unsuitable.

- Footprint Requirements: Current Fe-air density is approximately 2.5 MW per acre. A 1.93 MW system would require roughly a larger area than what is proposed for this project.
- Operational Maturity: Although 2026 marks its first utility deployments, it is not yet a mainstream, high-density solution for compact distributed generation sites.

3. Redox Flow Batteries (Vanadium/Zinc)

Flow batteries are expanding into long-duration energy storage (LDES) markets, especially for data centers and industrial microgrids, due to their minimal degradation over 20,000+ cycles.

- Why it cannot be implemented at this site:
  - Low Energy Density: Flow batteries utilize large liquid electrolyte tanks, resulting in a significantly larger physical footprint.
  - Efficiency: Vanadium flow systems typically have a round-trip efficiency of ~70%, compared to the 93.7% delivered by the Megapack 2 XL. This loss of nearly 24% of stored energy makes the project economically unviable under current front-of-the-meter program constraints.
  - Mechanical Complexity: Flow batteries require pumps, valves, and ongoing maintenance of the circulation system, which increases operational risk and system downtime for a remote, unmanned site.

4. Lithium-Ion (LFP) - Selected Technology

The proposed site uses the Tesla Megapack 2 XL, which utilizes Lithium Iron Phosphate (LFP) chemistry.

- Proven Scale: By 2026, LFP has become the dominant technology for grid storage, with costs dropping to record lows of $70/kWh for stationary systems.

- Site Suitability: Its high energy density allows for the required 1.93 MW capacity to be housed safely within a compact footprint while maintaining all required setbacks.

- Safety: LFP offers superior thermal stability and resists thermal runaway propagation better than previous nickel-based Li-ion chemistries.

- Reliability: With billions of operating hours globally, LFP is currently the most bankable and technically suitable technology for distributed generation projects in Connecticut.

Interrogatory CSC 19

Q-CSC 19: Referencing Petition Supplemental Submission dated December 30, 2025, Sheet SU-1 and DN-1, what material is the sound barrier made of? What is the lifespan of the material?

A-CSC 19: The sound barrier consists of a sandwich construction with solid galvanized metal outer skin, acoustical insulation fill and perforated galvanized metal inner skin. The barrier is expected to last approximately 20 years.

Interrogatory CSC 20

Q-CSC 20: Referencing Petition Exhibit E-1, Figure 2, what is the significance of the 8-foot clearance?

A-CSC 20: The 8’ clearance is the minimum clearance for battery servicing.

Q-CSC 21: Referencing Petition p. 8, in the event of a power outage, would the proposed BESF supplement any existing backup generator(s), or would the BESF operate alone to serve GHS load? Approximately what percentage of the GHS baseload could the BESF provide? Approximately how many hours could the BESF provide backup power to GHS before fully discharged?

A-CSC 21: In the event of a power outage, the BESF will automatically switch to island mode to serve the GHS load. The system is designed to operate in coordination with other on-site generation assets, such as existing backup generators, to provide an integrated source of power while disconnected from the utility grid. Once the BESF is depleted, the generator will provide power to the facility.

Q-CSC 22: How will the facility be dispatched and by whom?

A-CSC 22: The facility will be dispatched by CPower following a charge and discharge schedule approved by Eversource. Technical execution of these dispatch commands is managed by the Microgrid controller.

Q-CSC 23: When would the facility be dispatched (actively and passively) and for what duration? How long will it take for the BESF to attain full output from when it is dispatched?

A-CSC 23: Dispatch occurs for applications such as peak shaving and demand response. The duration at full rated power is 2 hours. The system provides nearly instantaneous response to power commands.

Q-CSC 24: What is the cumulative efficiency of the discharge output (e.g.- the BESF can only discharge 90% of its stored capacity)?

A-CSC 24: The round-trip efficiency is approximately 92%.

Interrogatory CSC 25

Q-CSC 25: When would the facility recharge (ex. off-peak hours)? What factors are considered for the recharge interval? Explain.

A-CSC 25: The facility will recharge during off-peak hours or periods of high renewable generation, following a charge and discharge schedule approved by Eversource. Recharge intervals are managed by autonomous software that considers economic optimization, grid stability requirements, and learned facility energy patterns.

Interrogatory CSC 26

Q-CSC 26: What storage capacity losses are anticipated for ambient temperatures below freezing?

A-CSC 26: The Megapack's liquid cooling and heating system maintains optimal cell temperatures between 25°C and 35°C, even in arctic cold. The system is rated for an operating ambient temperature range of -30°C to 50°C (-22°F to 122°F) and capacity losses are minimal. Because the thermal management system prioritizes internal temperature stability, capacity losses due to freezing ambient temperatures are negligible.

Q-CSC 27: Would the BESF utilize power for cooling and heating of the battery pack? If yes, would this power source be from stored energy or from the local distribution system?

A-CSC 27: The system utilizes an integrated liquid cooling and heating system. The power source for this thermal management (auxiliary load) is drawn from the Megapack AC bus bars. This power can be supplied by either the grid (distribution system) or the battery modules themselves. An external HVAC or separate auxiliary power circuit is not required.

Interrogatory CSC 28

Q-CSC 28: Referencing Petition Supplemental Submission dated December 30, 2025, Sheet SU-1 and Petition Attachment A - Drawing E-300, is the proposed pad-mounted transformer within the fenced BESF compound the same as the Grounding Transformer identified on the one-line diagram?

A-CSC 28: Yes.

Interrogatory CSC 29

Q-CSC 29: Referencing Petition Supplemental Submission dated December 30, 2025, Sheet SU-1, two underground electrical connections exit the fenced BESF compound. One connects to the proposed pad-mounted utility transformer, and one connects to the secondary line interception point. Provide the line voltages of each underground connection (e.g. 480 Volt).

A-CSC 29: 277/480V.

Interrogatory CSC 30

Q-CSC 30: Referencing Petition Exhibit A, Drawing E-300, what is the primary (high side) voltage of the proposed utility transformer?

A-CSC 30: The local distribution circuit and high side of the transformer is 13.8kV.

Q-CSC 31: Referencing Petition p. 7, what is the status of the Interconnection Application with Eversource? Would any upgrades or modifications to the distribution system be necessary to accommodate the BESF?

A-CSC 31: System Impact Study Agreement was received on December 31, 2025. The Interconnection Agreement is currently under review by Eversource and is expected to be executed in March.

Interrogatory CSC 32

Q-CSC 32: Would the facility be able to automatically disconnect from the grid in the event of a fault or other electrical disturbance? Explain.

A-CSC 32: Yes, the Tesla Megapack 2 XL is designed to automatically disconnect from the grid during electrical disturbances to ensure both system safety and grid stability.

Interrogatory CSC 33

Q-CSC 33: Referencing Petition Exhibit A – Drawing G100, would the proposed BESF interact with the existing rooftop solar array at GHS? Explain.

A-CSC 33: No. In the event of a grid outage, the existing rooftop solar array will go offline. The BESF will then switch to island mode to serve the GHS load independently using stored energy.

Interrogatory CSC 34

Q-CSC 34: Referencing Petition p. 20, would the facility comply with the current Connecticut State Building Code, Connecticut State Fire Prevention Code, National Electrical Code (NEC) and the National Electrical Safety Code (NESC)?

A-CSC 34: Yes. The facility will comply with the Connecticut State Building and Fire Prevention Codes, the NEC, and the NESC.

Interrogatory CSC 35

Q-CSC 35: What security measures would be employed to protect the BESF from vandalism or intrusion?

A-CSC 35: The facility will be enclosed by a 7-foot-tall chain-link fence with locked access via a Knox Box or universal key system for emergency responders. The Megapack unit is housed in a tool-accessible, tamper-resistant IP66-rated steel enclosure.

Interrogatory CSC 36

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Q-CSC 36: Would the construction or operation of the proposed facility impact or interfere with any existing utilities or infrastructure within the site including, but not limited to, the existing natural gas line located in the eastern portion of the site? If so, identify any measures that would be employed to protect existing utilities or infrastructure from impact or interference.

A-CSC 36: No interference is anticipated. All underground utilities were identified via Ground Penetrating Radar (GPR) during the design phase to ensure zero impact on existing school infrastructure.

Interrogatory CSC 37

Q-CSC 37: Would lighting be installed at the facility? If so, for what purpose and what type would be installed (e.g. motion activated, preset timer)?

A-CSC 37: Switched LED lighting will be installed for security and to facilitate maintenance activities after dark.

Q-CSC 38: What types of fire suppression media can be applied directly to a BESF fire? Is there a concern with runoff and cleanup caused by fire extinguishment?

A-CSC 38: Water is the primary recommended media for cooling adjacent exposures and preventing fire spread. Runoff is mitigated by the unit's integrated secondary containment basin which captures internal liquid leaks.

Q-CSC 39: What are the typical causes of a battery fire at a BESF? What is the typical duration of a battery fire before it self-extinguishes? What is the reason for longer duration fires?

A-CSC 39: Typical causes of a battery fire at a BESF include internal short circuits, mechanical damage, or overcharging. A battery module fire typically lasts 3 to 5 hours and is contained by internal fire barriers to prevent propagation. The duration of a fire increases if it spreads to additional cells and modules within the system, or if a module re-ignites after the initial event.

Interrogatory CSC 40

Q-CSC 40: Would the battery container have a ventilation system to exhaust flammable gases? Would the facility have heat and gas sensors connected to a fire alarm system that could notify the fire department? Explain.

A-CSC 40: Yes. The enclosure includes integrated ventilation and overpressure vents. It is equipped with heat and gas sensors that alert the Tesla System Controller.

Interrogatory CSC 41

Q-CSC 41: Are there municipal fire water sources located in the immediate vicinity of the proposed site for response tie-in in the event of a fire? If yes, provide the distance and direction from the BESF site.

A-CSC 41: The closest hydrant is located approximately 40 feet west of the 7-foot perimeter fence of the proposed BESS area, situated on the edge of the bus circle adjacent to the sidewalk.

Interrogatory CSC 42

Q-CSC 42: 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? Would this media contain any polyfluoroalkyl substances (PFAS)?

A-CSC 42: No specialized media (like Class D dry powder) is required because LFP batteries do not contain solid metallic lithium; standard firefighting cooling equipment is effective.

Interrogatory CSC 43

Q-CSC 43: Referencing Petition Exhibit H – Emergency Response Plan, Sections 4.2.1 and 4.2.2, would there be a containment system for the ethylene glycol solution and low-level detection system? Would the BESF have a low refrigerant level (e.g. low pressure) detection system for the R-134a?

A-CSC 43: Yes. Each Megapack unit contains an integrated 900L gravity-fed secondary containment basin for the ethylene glycol coolant solution. A reservoir level sensor provides automated low-level detection alerts.

Interrogatory CSC 44

Q-CSC 44: Submit a site-specific Fuel Storage and Spill Prevention Control Plan for site construction and operation with worker training and contact information including, but not limited to, regulatory agencies, spill cleanup contractors, and emergency responders.

A-CSC 44: Please see Attachment CSC-44-1.

Interrogatory CSC 45

Q-CSC 45: Are any existing structures located within 150 feet of any battery cabinets? If so, identify such structures and provide the distances/directions from the nearest battery cabinet.

A-CSC 45: Yes, the closest structure is the wall enclosing existing co-generator unit, utility transformer and back up generator.

Interrogatory CSC 46

Q-CSC 46: Please respond to the following:

a) Would smoke from a BESF 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.

A-CSC 46: a) Yes.
b) The determination to evacuate or shelter-in-place is made by the Guilford Fire Marshal or the Incident Commander at the scene. Notifications to the public are made by local emergency response agencies through established community alert systems.
c) The Emergency Response Plan will not contain a map with addresses of properties requiring evacuation and/or isolation for certain type of emergencies. The evacuation and isolation distances are determined by the Local Fire Marshal based on real-time factors like wind and plume direction; an aerial image will not be provided.
d) A thermal runaway fire is the primary emergency requiring downwind evacuation, though the Megapack's roof-mounted deflagration vents are designed to direct smoke and flames vertically to mitigate ground-level impact. While the Local Fire Marshal determines specific evacuation distances based on real-time wind and plume direction, the ERP requires all personnel to immediately evacuate the 7-foot fenced perimeter and stay clear of the visible smoke plume.
e) Final evacuation and isolation distances are determined by the Local Fire Marshal based on real-time factors like wind and plume direction so there is not aerial image to provide.

Q-CSC 47: Would operation of the BESF cause discernible vibrations at off-site locations?

A-CSC 47: The operation of the BESF will not cause discernible vibrations at off-site locations.

Interrogatory CSC 48

Q-CSC 48: Is there a standard or recommended minimum distance of a BESF to a publicly accessible area? Provide citation of such distance.

A-CSC 48: Two standards exist. IFC calls out 20’ from public exposure while NFPA calls out 10’. Both allow for reduced clearance if a fire rated structure is used for separation from the public.

Interrogatory CSC 49

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Q-CSC 49: What are the industry Best Management Practices for Electric and Magnetic Fields at battery storage facilities? How would the proposed facility be consistent with such practices?

A-CSC 49: EMF is not considered a concern due to the low voltage of the BESF.

Interrogatory CSC 50

Q-CSC 50: Would the proposed facility be designed with animal deterrents to prevent damage from chewing, nest building, etc.? If yes, describe.

A-CSC 50: Yes. All enclosure openings and ventilation louvers are screened or sealed.

Interrogatory CSC 51

Q-CSC 51: Would the facility be remotely monitored with the ability to disconnect the entire facility from the grid if necessary?

A-CSC 51: Yes.

Interrogatory CSC 52

Q-CSC 52: If the proposed facility is disconnected from the grid, would the battery container still be energized and a shock hazard?

A-CSC 52: No. External AC terminals are de-energized upon disconnection. However, internal battery modules remain energized and are isolated for safety via a lockable “Enable Switch” during servicing.

Q-CSC 53: Describe the potential battery vent gas release scenarios from a thermal runaway event at the proposed facility site.

A-CSC 53: The system is engineered to “fail safely” by choosing to burn the gas immediately and venting the result away from people and property, rather than allowing pressure to build to a critical failure point.

Q-CSC 54: 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/dockets-and-other-pending-proceedings/dockets300-400/docket_346/whitepprfinalpdf.pdf?rev=2be05a915ef64a858f9fdb83bb8e41f1&hash=58B2D9EA6E251AEE484E77A494E09A68 Would safety signs be located on the BESF fence?

A-CSC 54: The facility complies with perimeter fencing, locking enclosures, 24/7 remote monitoring, and safety signage.

Interrogatory CSC 55

Q-CSC 55: What type of insulating oil is used for the proposed transformer within the BESF compound? Is it biodegradable? Does the transformer have a containment system in the event of an insulating oil leak? Would the transformer have a low oil alarm?

A-CSC 55: The transformer is owned by Eversource, and it is likely to choose a biodegradable oil.

Interrogatory CSC 56

Q-CSC 56: Are there any wells on the site or in the vicinity of the site? If so, how would SMS protect the wells and/or water quality from potential construction and operational impacts?

A-CSC 56: There are no wells on site.

Interrogatory CSC 57

Q-CSC 57: What measures would SMS take to capture and treat any firewater runoff, if necessary?

A-CSC 57: Operational firewater is managed via the Emergency Response Plan (ERP), which dictates a “defensive” strategy: the self-contained Megapack is allowed to consume itself while water is used minimally only to cool adjacent structures. If firewater application is required by the Local Fire Marshal, any resulting runoff would be managed in coordination with local environmental authorities to ensure proper containment and treatment based on the specific site conditions.

Interrogatory CSC 58

Q-CSC 58: Referencing Petition p. 15, Exhibit A – Sheet ES-1 and Exhibit E – Resource Protection Program, estimate how many trees in addition to the six Eastern white pine trees would be removed to construct the BESF?

A-CSC 58: SMS does not expect to need to remove any additional trees.

Interrogatory CSC 59

Q-CSC 59: Referencing Petition p. 15 and Exhibit A – Sheet ES-1, could any of the trees that must be removed be relocated to reduce visibility of the proposed facility? Explain.

A-CSC 59: SMS will consider the relocation of trees to reduce visibility of the facility prior to the removal of the trees.

Interrogatory CSC 60

Q-CSC 60: Referencing Petition Exhibit E – Supplemental Appendix 1, would the fence have privacy slats or screening material? If yes, identify such fence screening plans and whether the material could reduce sound levels from facility operation.

A-CSC 60: No.

Interrogatory CSC 61

Q-CSC 61: Referencing Petition p. 21, where would the staging/laydown area be located, if applicable?

A-CSC 61: The grassy area which is the site of the BESF and electrical gear will be temporarily fenced off during construction. All construction vehicles and gear for the installation will need the use of up to 8 parking spots northeast of the location near the tennis courts. All gear will be secured in a Conex container.

Interrogatory CSC 62

Q-CSC 62: Referencing Updated Site Plan – Sheet T-1, construction of the proposed facility would result in approximately 22 cubic yards of net cut material. Where will excess cut be disposed of?

A-CSC 62: Any excess fill will be removed from the site and used by a landscaping company.

Interrogatory CSC 63

Q-CSC 63: When does the Town 2025-2026 school year end and when does the Town 2026-2027 school year begin?

A-CSC 63: The school year ends on June 18, 2026 and the new school year begins on September 3, 2026.

Interrogatory CSC 64

Q-CSC 64: Referencing Petition p. 24, within the fenced BESF compound, would concrete pads need to be poured on-site for the equipment and battery cabinet, or would the concrete pads be delivered to the site?

A-CSC 64: The concrete pads will need to be poured on-site.

Interrogatory CSC 65

Q-CSC 65: Referencing Petition p. 6, what is the estimated cost of replacement/replenishment in year 10?

A-CSC 65: Battery has a warranty of 15 years. Any parts to be replaced within that timeframe will be done by Tesla at no cost to the project.

Q-CSC 66: At what time intervals would the transformer, inverters and switchgear need replacement?

A-CSC 66: The step up transformer is owned by Eversource. The inverters and batteries are expected to last the life of the service contract (10 years). The switchgear typically will last 20-25 years.

Interrogatory CSC 67

Q-CSC 67: What minimum snow depth would require removal within the BESF compound? At what height could snow block the airflow to the cooling system and/or electronic compartments? Who would be responsible for snow removal for the access drive and within the compound?

A-CSC 67: Snow accumulation exceeding 12 to 18 inches must be removed to prevent restricted airflow to the Megapack's cooling system and electronic compartments. Guilford HS is responsible for clearing the access drive to maintain 24/7 emergency and maintenance access.