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

March 11, 2026

Bruce L. McDermott, Esq.
Harris Beach Murtha
265 Church Street, 9th Floor
New Haven, CT 06510
bmcdermott@harrisbeachmurtha.com

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. **Council Interrogatories to Petitioner.**

Dear Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than March 31, 2026. 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 March 31, 2026 deadline.

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie Bachman
Executive Director

MAB/MP

c: Service List dated December 8, 2025

Enclosure: Revised Schedule, dated March 11, 2026

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REVISED SCHEDULE

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.

Petition received	12/05/2025
Public Comment Period Deadline	01/04/2026
Public Comment Period Deadline w/ extension	01/15/2026
Deadline for State Agency Comments	01/04/2026
Deadline for State Agency Comments w/ extension	01/15/2026
Deadline for Municipal Comments	01/04/2026
Deadline for Municipal Comments w/ extension	01/15/2026
Council 60-Day Action – Set Date for Decision to 06/03/2026	01/22/2026
Deadline for Action	02/03/2026
Council Interrogatories • Issued • Responses due	 03/11/2026 03/31/2026
Deadline for Final Decision	**06/03/2026**

Revised 3/11/2026

Petition No. 1699
SMS CT MG02A, LLC
605 New England Road, Guilford, Connecticut
Interrogatories
March 11, 2026

Notice

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.

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

Public Benefit

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?

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

5. Referencing page 8 of the Petition, in what potential available energy markets would SMS participate?

Project Development

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?

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?

Proposed Site

8. Is the proposed site located within an environmental justice community?

9. What are the benefits of the proposed site location? For example, is the proposed site located within a "load pocket" area or on the "grid edge"?

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

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.

Proposed Facility and Associated Equipment

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

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.

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.

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.

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.

17. Referencing Petition Exhibit B, why was the Tesla Megapack 2XL BESF selected for this facility?

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)

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?

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

Energy Output

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?

22. How will the facility be dispatched and by whom?

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?

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

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

26. What storage capacity losses are anticipated for ambient temperatures below freezing?

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?

Electrical Interconnection

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?

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).

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

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?

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

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

Public Health and Safety

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)?

35. What security measures would be employed to protect the BESF from vandalism or intrusion?

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.

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)?

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?

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?

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.

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.

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)?

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?

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.

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.

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.

47. Would operation of the BESF cause discernible vibrations at off-site locations?

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

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?

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

51. Would the facility be remotely monitored with the ability to disconnect the entire facility from the grid if necessary?

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

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

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?

Environmental Effects and Mitigation Measures

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?

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?

57. What measures would SMS take to capture and treat any firewater runoff, if necessary?

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?

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.

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.

Facility Construction

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

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?

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

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?

Facility Maintenance/Decommissioning

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

66. At what time intervals would the transformer, inverters and switchgear need replacement?

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?