



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

December 30, 2025

TO: Service List, dated December 8, 2025

FROM: Melanie Bachman, Executive Director *MAB*

RE: **PETITION NO. 1700** – VFS, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 920-kilowatt fuel cell facility and associated equipment located at the University of Connecticut Avery Point Campus, 1084 Shennecossett Road, Groton, Connecticut, and associated electrical interconnection.

Comments have been received from the Connecticut Department of Energy & Environmental Protection on December 30, 2025. A copy of the comments is attached for your review.

MAB/ANM/dll

c: Council Members
CGS §16-50j(i) State Agency Comment List (via electronic mail)

December 30, 2025

Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

RE: 920-kilowatt fuel cell facility
University of Connecticut Avery Point Campus,
1084 Shennecossett Road, Groton, Connecticut 06340
VFS, LLC
Petition No. 1700

Dear Members of the Connecticut Siting Council:

Staff of the Department of Energy and Environmental Protection (DEEP) Office of Environmental Review & Strategic Initiatives (ERSI) have reviewed the above-referenced petition by VFS, LLC, for the construction, operation, and maintenance of two fuel cell units totaling 920-kilowatts of power located on the UConn Avery Point Campus at 1084 Shennecossett Road in Groton.

Staff are providing comments to discuss areas within DEEP's jurisdiction as they relate to the proposed project. DEEP staff may also include observations or discuss potential noise and visual impacts that can be avoided or mitigated through project planning. Staff may conduct site visits as part of the analysis to observe site characteristics that may not be captured in project plans.

Summary of Key Findings

The following are the key findings presented in this letter.

- The project was awarded a contract to sell Low Emissions Renewable Energy Credits to Groton Facilities through the Connecticut Low and Zero Emission Renewable Energy Credit Program.
- Project consists of two natural gas-fueled fuel cells 8 ft wide by 27 ft. long located behind the athletic center, adjacent to the University's Central Utilities Plant.
- Fire protection consists of gas sensors with automatic shut down and closing of natural gas supply valves and alarm notification to HyAxiom. Manual shutdown is also incorporated. Fuel cells contain a physical barrier separating gases from electrical components.
- No visual concerns, location is not in the public view.
- The site is not in a Natural Diversity Data Base area.
- No DEEP permits required.
- Noise study is based on engineering review with minimal details, but petitioner states the level will not exceed local and state noise ordinances.

Site Information

The fuel cell units are proposed to be located behind the athletic/ pool building, with the Central Utilities Plant being the closest additional structure to the fuel cells. There are no residential homes on this campus, closest residences are on Shennecossett Road, approximately 1,000 feet east from the athletic center, and Tyler Avenue, approximately 1,000 feet north from the athletic center. Also to the east of the campus is the Shennecossett Yacht Club, approximately 600 feet from the proposed fuel cells. Distances were measured utilizing the Town of Groton's GIS spatial data and spatial tools. The Avery Point Campus surrounds this location, with Shennecossett Beach, owned by the City of Groton, to the west approximately 1,200 feet from this site. The project will provide a renewable energy resource to supply power to planned campus building expansion. Future phases may consist of battery energy storage facilities and microgrid capabilities for the campus.

Project Description

The fuel cells and associated equipment will be installed on concrete pads for the two 460 KW Model 400+ Fuel Cells manufactured by HyAxiom. The overall dimensions of the fuel cells are approximately 8 feet wide by 27 feet long. The fuel cells are completely enclosed, factory assembled, and will be contained in a fenced area of approximately 51 feet by 106 feet.

DEEP's Divisions/ Programs

Stormwater Management

Site disturbance is less than one acre and does not trigger the need for DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewater from Construction Activities.

Natural Diversity Data Base

The project is not located in a Natural Diversity Data Base area.

Wetlands and Vernal Pools

There are no wetlands in the project area.

Air Emissions

The Regulations of Connecticut State Agencies, Section 22a-174-42, exempt fuel cells from air permitting requirements. Despite the exemption, fuel cells are classified as renewable energy sources because they generate energy through a nearly pollution-free electrochemical reaction.

Visual Impacts

The Facility will not cause any significant visual effects. The proposed site is located adjacent to the back of the pool building and across the driveway from the central utility plant and is not visible from Shennecossett Road.

Noise Impacts

The petition states that based on the engineering study results conducted by a professional acoustical engineer of the proposed site dated January 29, 2025, the noise level of the facility will not exceed local and state noise level ordinance levels. Once operational, levels will be further tested. No additional details were included in the petition.

Thank you for the opportunity to review this application and to submit these comments to the Connecticut Siting Council. DEEP's comments are based on information available for review as of the date of this letter, which may not fully apply if elements of this petition are modified through the Siting Council's administrative review process. Since this petition may be modified, these comments should not be considered as a final endorsement or rejection for the public record.

Respectfully yours,

Linda Brunza
Environmental Analyst 3

CC: Katie Dykes, DEEP Commissioner

