



## STATE OF CONNECTICUT

### CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

November 23, 2016

Dawn Mahoney, Esq.  
General Counsel  
Doosan Fuel Cell America Inc.  
195 Governor's Highway  
South Windsor, CT 06074

RE: **PETITION NO. 1257** – Doosan Fuel Cell America, Inc. petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required to replace an existing customer-side 400-kW fuel cell with a 440-kW customer-side combined heat and power fuel cell located at the Eastern Connecticut State University Science Building, 83 Windham Street, Willimantic, Connecticut.

Dear Attorney Mahoney:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than November 30, 2016. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as send a copy via electronic mail. 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 is requesting that 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.

Yours very truly,

Melanie Bachman  
Acting Executive Director

MB/MP

c: Council Members

**Petition No. 1257**  
**Doosan Fuel Cell America, Inc.**  
**83 Windham Street**  
**Willimantic (Windham), CT**  
**Interrogatories – Set Two**

23. Referencing Doosan Fuel Cell America, Inc.'s (Doosan) response to question 18, explain why Doosan utilized the 2012 eGRID "Fossil Fuel Output Emissions Rate" as opposed to the "Total Output Emissions Rate" or the "Non-baseload Emissions Rate"? For example, is it because page 10 of the How to use eGRID for Carbon Footprinting Electricity Purchases in Greenhouse Gas Emissions Inventories document dated July 2012 states, "The EPA Combined Heat and Power (CHP) Partnership recommends the use of the fossil fuel output emission rates for displaced grid supplied electricity from a CHP application because CHP units tend to operate on a continuous basis, characteristic of baseload generating units" and the proposed replacement fuel cell project is a CHP project operating as baseload? That document can be found at <https://www3.epa.gov/ttn/chief/conference/ei20/session3/adiem.pdf>.

R23. Yes. That is exactly the recommendation we follow.

24. Referencing Doosan's response to question 18, where was the grid loss factor of 9.17 percent obtained from?

R24. From eGRID 2012 data for the Eastern Region (see below)

**9. Year 2012 eGRID Grid Gross Loss (%)**

Region	Grid Gross Loss (%)
Eastern	9.17
Western	5.76
ERCOT	7.03
Alaska	8.66
Hawaii	7.69
<b>U.S.</b>	<b>8.33</b>