

December 19, 2016

Justin Adams
Bloom Energy Corporation
1299 Orleans Drive
Sunnyvale, CA 94089

RE: PETITION NO. 1264 - Bloom Energy Corporation, as an agent for Frontier Communications Corporation, petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the construction, operation and maintenance of a Customer-Side 400-Kilowatt Fuel Cell Facility to be located at the Frontier building, 25 Butler Street, Meriden, Connecticut.

Dear Ms. Bachman,

We are submitting an original and fifteen (15) copies of the interrogatories response for Petition NO. 1264. Also included in this response, is an updated site plan including a "sound wall" detail. The request for updated plans was made during the field review on December 16, 2016. See *Exhibit 2.1*.

Sincerely



Justin Adams
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Petition No. 1264
Bloom Energy Corporation
25 Butler Street, Meriden, Connecticut

Interrogatories

1. No. What would otherwise be considered waste heat is instead used internally to increase the electrical efficiency of the fuel cell system. As a result there is no useful waste heat generated by the fuel cell. The minimal amount of thermal load present at the host site would preclude the efficient deployment for the building's internal use or supplement domestic heating and/or hot water.

2. Please refer to the datasheet, as it provides a range of emissions specific to the type of fuel cell for the proposed Facility. We have revised Table 1 to match the information provided in the datasheet.

Revised Table 1

Compound	Connecticut Emission Standard (lbs/MW-hr)¹	Bloom Energy Server (lbs/MW-hr)
Oxides of Nitrogen (NO _x)	0.15	<0.01
Carbon Monoxide (CO)	1	<0.05
Carbon Dioxide (CO ₂)	1,650	679-833

3. Yes, the eGrid rate for New England is 1,079.73 lbs/MWh, for the State of CT it is 1,063.10 lbs/MWh for this installation it ranges between 679-833 lbs/MWh.

4. The proposed facility will displace less efficient fossil fueled marginal generation on the NE ISO system. Based upon US EPA "eGrid" data the proposed facility is expected to reduce carbon emissions by more than 25% while essentially eliminating local air pollutants like NOx, SOx, and particulate matter.

5. No gaseous substances are released or vented at any point during the desulfurization process.

6. Bloom systems do not create such substances. However, public pipeline natural gas supplied to homes and businesses can include sulfur oxides and other naturally occurring elements, such as benzene. Bloom's desulfurization units contain a catalyst designed to remove the sulfur from the gas before it reaches the fuel cell. In this process, the catalyst may also pick up some benzene and in some cases exceed the RCRA threshold. The catalysts are sent to a central location and processed by a qualified facility in Texas.

¹ Conn. Agencies Regs. § 22a-174-42, Table 42-2.

7. There is no discharge point or connection to the fuel cell.
8. An inert gas such as Nitrogen will be used as the media for the pipe cleaning procedures described on page 4 of the petition.
9. The City of Meriden allows noise generated from construction during daytime hours only. They define daytime hours between 7:00 a.m. and 10:00 p.m. Mondays through Saturdays, and the hours of 9:00 a.m. through 9:00 p.m. Sundays and federal and state holidays.

Bloom anticipates work hours to only occur during daytime hours Monday – Friday, but may need to work Saturdays or Sundays if an expedited schedule is required.

Bloom anticipates construction to start in the spring of 2017 with 6-8 weeks of total construction time (2 weeks of site prep, 2 weeks of installation, and 2 weeks of commissioning).

10. The operational life is for the life of the contract, Bloom expects 20+ years. The solid oxide media in the fuel cells is exchanged at approximately 5 year intervals.
11. The closest residential property would be located approximately 55 feet to the west of the proposed Facility.
12. No. According to GIS data provided by CTDEEP, there is an Aquifer Protection Area identified approximately 700 feet to the north of the proposed site. See *Exhibit 13*.
13. According to GIS data provided by CTDEEP, there are no identified wetlands within 1,000 feet of the proposed site. A channelized portion of the Harbor Brook is approximately 300 feet to the south of the proposed site. See *Exhibit 14*.
14. The options at the conclusion of the 20 year contract between Bloom and Frontier includes;
 - Frontier renews the contract,
 - Frontier returns the Facility at no cost, or
 - Frontier buys the Facility at a fair market value.

If the Facility is to be removed at the end of the contract or if there is a default in the contract;

- the Energy Servers, associated equipment and components will be dismantled and removed,
- the concrete pads will remain unless requested to be removed,
- the sound attenuation wall will remain unless requested to be removed, and
- the site will be restored as nearly as practicable to its effective original condition.

Exhibit 2.1

Exhibit 13

Aquifer Protection Area

Legend

25 Butler St
Lake St



Google earth

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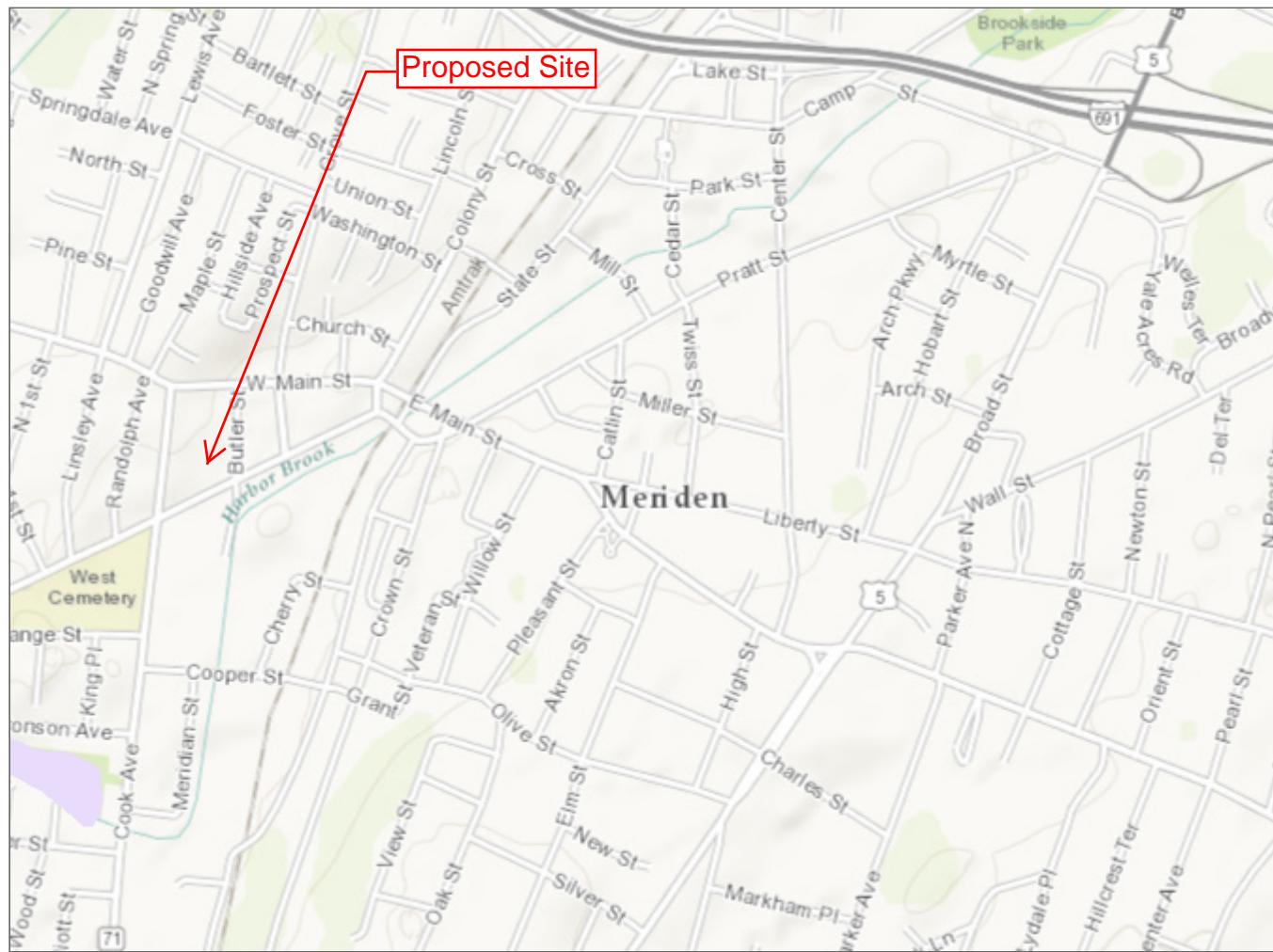
▲ N

2000 ft

Exhibit 14

Connecticut Inland Wetland Soils

Inland wetland soil polygons providing the location of soils defined as inland wetlands in Connecticut.



MassGIS, Esri, HERE, DeLorme, INCREMENT P, USGS, METI/NASA, EPA, USDA

Legend

Inland Wetland Soils

- Poorly Drained and Very Poorly Drained Soils
- Alluvial and Floodplain Soils