

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

DOOSAN FUEL CELL AMERICA, INC. PETITION  
FOR A DECLARATORY RULING THAT NO  
CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED IS REQUIRED  
FOR THE CONSTRUCTION, MAINTENANCE, AND  
OPERATION OF A CUSTOMER-SIDE 460-KILOWATT  
FUEL CELL FACILITY TO BE LOCATED AT THE  
NORWICH INN & SPA, 607 WEST THAMES STREET  
NORWICH, CONNECTICUT.

PETITION NO. 1265

January 9, 2017

**MOTION FOR EXTENSION OF TIME TO  
RESPOND TO COUNCIL INTERROGATORIES**

Doosan Fuel Cell America, Inc. (“Doosan”) hereby moves the Connecticut Siting Council (“Council”) for an extension of time to respond to the Council’s Interrogatories Set Two, issued December 28, 2016, in the above-captioned matter. In support of this Motion, Doosan states:

1. Doosan received the Interrogatories via electronic mail on December 28, 2016, and via regular mail thereafter. The deadline to respond to the Interrogatories is January 11, 2017. Doosan also received Interrogatories in two (2) other matters from the Council during this time period with deadlines for response during the same week of January 9<sup>th</sup>.
2. The Interrogatories contain requests for a noise analysis and the Council has requested more specific studies be provided to support our specifications, along with other requests for other additional detailed information from Doosan. Doosan has already engaged outside firms regarding conducting a noise analysis, but the procurement process and the analysis require additional time.
3. While Doosan has begun to make progress on answering some of the Interrogatories, Doosan requires additional time in order to conduct a full sound analysis for each site, and to more fully

assess and gather the information and data needed to adequately and fully answer all  
Interrogatory questions on each petition.

WHEREFORE, for all of the foregoing reasons, Doosan hereby requests that the Council  
grant an extension of time to respond to the Interrogatories until January 30, 2017.

Respectfully Submitted,  
Doosan Fuel Cell America, Inc.

By:   
Dawn Mahoney, Esq.  
General Counsel  
195 Governor's Highway  
South Windsor, CT 06074