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 1840-KILOWATT FUEL CELL FACILITY TO BE LOCATED AT THE WATERBURY WATER POLLUTION CONTROL PLANT, 210 MUNICIPAL ROAD, WATERBURY, CONNECTICUT.

PETITION NO. 1266

January 17, 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:

- 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 18, 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 17th.
- 2. The Interrogatories contain requests for a site-specific 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 noise analysis and delivery of the report require additional time. Additionally, due to weather, the firm engaged to perform the noise analysis is further delayed in conducting the study.
- 3. While Doosan has begun to make progress on answering the other Interrogatories, Doosan requires additional time in order to conduct a full sound analysis for the site, and to more fully

assess and gather the information and data needed to adequately and fully answer all Interrogatory questions on each petition. Doosan's intent is to answer all other interrogatories for Petition 1266 by the deadline, with the exception of Interrogatory No. 30, to which Doosan will submit the noise analysis no later than February 10, 2017.

WHEREFORE, for all of the foregoing reasons, Doosan hereby requests that the Council grant an extension of time to respond to the Interrogatory No. 30 until February 10, 2017.

Respectfully Submitted,

Doosan Fuel Cell America, Inc.

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