

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
UNILEVER RESEARCH AND DEVELOPMENT
CENTER BUILDING, 20 MERRITT BOULEVARD,
TRUMBULL, CONNECTICUT.

PETITION NO. 1268

December 21, 2016

**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 issued December 5, 2016, in the above-captioned matter. In support of this Motion, Doosan states:

1. Doosan received the Interrogatories via electronic mail on December 4, 2016, and via regular mail thereafter. The deadline to respond to the Interrogatories is December 23, 2016. Doosan also received Interrogatories in petitions from the Council during this time period with deadlines for response during the same week.
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 20, 2017.

Respectfully Submitted,
Doosan Fuel Cell America, Inc.

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