

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
PETITION OF GROTON FUEL CELL 1, LLC	:	PETITION NO. 1214
FOR A DECLARATORY RULING THAT A	:	
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED IS	:	
NOT REQUIRED FOR THE INSTALLATION	:	
OF A FUEL CELL AT THE PFIZER GROTON	:	
CAMPUS	:	March 2, 2016

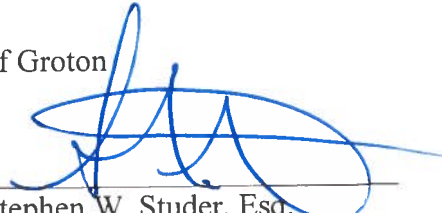
STATEMENT OF CONCERNS AND  
REQUEST FOR CONTINUANCE

The City of Groton ("City") is in receipt of a copy of the interrogatory responses of Groton Fuel Cell 1, LLC (GFC"). Q-CSC-2 asked if the City of Groton has expressed any concerns since the filing of the Petition and, if so, for GFC to indicate those concerns. In its response to Q-CSC-2, GFC replied in pertinent part, "...Pfizer received communication from Groton Utilities expressing concern about Pfizer's entry into a Power Purchase Agreement with GFC within Groton Utilities' municipal franchise territory."

For clarity, the City herewith indicates, for the record, that through Groton Utilities, a department of the City, it operates a municipal electric utility pursuant to special act and the provisions of Chapter 100 of the Connecticut General Statutes. The City has two concerns regarding the Petition. First, it believes that GFC's ownership of the two fuel cells and the sale of power within the City's exclusive service area violates the City's municipal franchise rights. Second, it believes that the Power Purchase Agreement by and between GFC and Pfizer violates certain contractual provisions set forth in a Market Priced Power Supply Agreement and an Interconnection Agreement, both by and between Pfizer and the City.

The City respectfully requests that the Connecticut Siting Council postpone issuance of a decision in this matter until its next scheduled meeting in order to afford the City an opportunity to discuss its concerns with GFC and Pfizer.

City of Groton

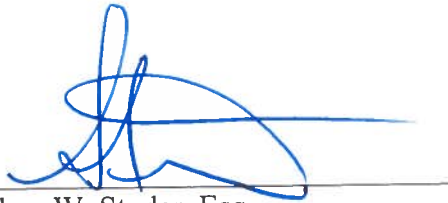
  
By: Stephen W. Studer, Esq.  
Berchem, Moses & Devlin, P.C.  
Its Attorney

CERTIFICATION

I hereby certify that a copy of the foregoing was e-mailed to the following parties on the 2nd day of March, 2016:

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Stephen W. Studer, Esq.