

BRUCE L. McDERMOTT
203.772.7787 DIRECT TELEPHONE
860.240.5723 DIRECT FACSIMILE
BMcDERMOTT@MURTHALAW.COM

October 18, 2018

Mr. Robert Stein
Chairman
The Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: PETITION 1350 - EIP Investment LLC Petition for a Declaratory Ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the Proposed Construction, Maintenance and Operation of a 19.98-megawatt Combined Heat and Power Fuel Cell Facility and Associated Equipment to be Located Within Building 107 on the Corner of Curtis Street and the Pan Am Southern, LLC Railroad Tracks at the Stanley Black & Decker Campus, 480 Myrtle Street, New Britain, Connecticut

Dear Chairman Stein:

Enclosed please find the original and fifteen (15) copies of EIP Investment LLC's response to Interrogatory 36 of the Siting Council's First Set of Interrogatories dated October 5, 2018 in connection with the above-referenced petition.

Please feel free to contact me with any questions concerning this submittal at (203) 772-7787.

Very truly yours,



Bruce L. McDermott

Enclosures

Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
T 203.772.7700
F 203.772.7723

Interrogatory CSC-1-36

EIP Investment, LLC
 Petition No. 1350

Witness: Mark Wick
 Page 1 of 1

Q-CSC-1-36: Provide a table showing state criteria thresholds and projected emissions from the proposed facility for all greenhouse gasses listed in the Regulations of Connecticut State Agencies Section 22a-174-1(49) with and without the use of waste heat (as applicable).

A-CSC-1-36: Section 22a-174-1(49) of the Regulations of Connecticut State Agencies (“RCSA”) states the following: ““Greenhouse gases” or “GHGs” means the aggregate of the following six component gases: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), any hydroflourocarbon (HFC) or any perfluorocarbon (PFC).” There is no defined criteria threshold for these compounds, however RCSA Section 22a-174-1(21) provide a method for computing carbon dioxide equivalent emissions “CO₂e”. The proposed facility will have no emissions of SF₆, HFC, and PFC. Emissions of CH₄ and N₂O will be very low and not contribute significantly to the Global Warming Potential of the proposed facility. Refer to the below table for calculation of the proposed facility’s carbon dioxide equivalent emissions. Use of heat recovery will offset GHG emissions from alternative sources of heat, but not reduce emissions from the proposed facility.

CO₂e emission rates from proposed facility

Emission Type	Projected Emissions	GWP in 40 CFR 98, Table A-1	Projected CO ₂ e
CO ₂	84,050 ton/year	1	84,050 ton/year
CH ₄	<2 ton/year	25	<50 ton/year
N ₂ O	<1 ton/year	298	<300 ton/year
SF ₆	N/A	22,800	N/A
HFC	N/A	12 to 14,900*	N/A
PFC	N/A	7,390 to 17,340	N/A