



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

October 5, 2018

Bruce L. McDermott, Esq.
Murtha Cullina LLP
265 Church Street
New Haven, CT 06510

RE: **PETITION NO. 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 Attorney McDermott:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than October 17, 2018. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as a copy via electronic mail. In accordance with the State Solid Waste Management Plan, the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie A. Bachman
Executive Director

MB/MP/lm

c: Council Members

**Petition No. 1350
EIP Investment LLC
480 Myrtle Street
New Britain, CT
Interrogatories**

Notice

1. Did EIP Investment LLC (EIP or Petitioner) provide notice of the Petition to the following Connecticut State Agencies: Department of Consumer Protection, Department of Construction Services, and Connecticut Department of Labor? If no, please provide notice to such state agencies and indicate the date of mailing.

General

2. Figure 1 of the Petition references a 44 megawatt (MW) Data Center. Is that a projected 44 MW load as a result of the data center and/or future generating project? If it includes a future generating project, please indicate the fuel type, type of generation (e.g. fuel cell) and projected MW.
3. Figure 1 of the Petition depicts an "Existing Sub-station with 69-kV Grid Feed Microgrid Controls." Is this the Burritt Street Substation referenced on page 8 of the Petition? Figure 1 also depicts a "New Sub-Station Site." Is it correct to say that the new substation is not required for the proposed 19.98 MW fuel cell project?
4. Figure 1 of the Petition also depicts a "Proposed Rooftop Solar Installation." Is this a future project and unrelated to the proposed 19.98 MW fuel cell project? If yes, what is the projected MW of that project?
5. Figure 1 of the Petition also depicts a "Cogen/Chillers Site." Is this also a future project and unrelated to the proposed 19.98 MW fuel cell project? If yes, what is the projected MW of that project?

Electrical Interconnection

6. Page 1 of the Petition references a "96 kV electrical interconnection." Was this a typo and 69 kV was intended? Explain.
7. Page 8 of the Petition notes that, "The energy from the fuel cells will be transformed from 480V to 13.8kV in 9 locations within Building 100." Does this mean that nine transformers will be installed inside the building? Explain.

8. Page 9 notes that, "The Project will also entail various interconnection work required by a completed interconnection study." Has it been confirmed that Burritt Street Substation can handle the proposed nearly 20 MW of new generation to be interconnected, or is that still being evaluated?
9. Page 8 of the Petition notes that the existing feeders would be replaced with four 13.8-kV feeders. Would this utilize existing conduits, and would the entire feeder path be underground to reach Burritt Street Substation? Would the entire feeder path be located within the Stanley Black and Decker campus?
10. Page 8 of the Petition notes that a new 13.8-kV/69-kV transformer would be installed at Burritt Street Substation and connected to the existing 69-kV busbar.
 - a) How many megavolt-ampere (MVA) would the new transformer be?
 - b) Provide a drawing depicting the location of the transformer and interconnection to the busbar.
 - c) Would the substation fenceline need to be modified?
 - d) Would the transformer have or require containment measures to protect against leakage of insulating oil?
 - e) Would magnetic field levels be materially affected at the subject property lines? If yes, would it still be expected to be below the International Commission on Non-Ionizing Radiation Protection (ICNIRP) 2,000 mG limit?

Construction

11. Please provide an 8.5" x 11" or 11" x 17" version of Figure 4 – Arrangement of Units in Building 107 as a site plan.
12. How would the fuel cell units be delivered to the site, e.g. by truck or rail?
13. If the proposed facility is approved, approximately when would construction commence and when is it expected to be completed and operational? What are the expected typical work hours and days of the week that construction would occur?
14. Since all of the fuel cells would be located indoors, how would the fuel cell exhaust be handled? Would there be multiple stacks exiting the building? How tall a height would such stacks reach relative to the building height?

15. Would outdoor cooling modules be required to reject any waste heat that is not utilized inside the building? If yes, how many would be required, and where would they be located?

Operation

16. Would the proposed fuel cell provide baseload or backup power (or both) for Stanley Black and Decker? What percentage of the facility's power would the proposed fuel cell facility provide? Would any surplus power be sold to the grid?
17. Would the proposed fuel cell shut down in the event of a power outage? If so, does it have "black start" capability and the ability to automatically restart? Or would the facility continue operating during a power outage and provide seamless uninterruptable power to Stanley Black and Decker?
18. Provide a specifications sheet for the PureCell Model 400 fuel cell. This fuel cell has two operating modes: Power Mode at 460 kW and Eco Mode at 440 kW. Which modes would the fuel cell units operate at? Is the proposed 19.98 MW the approximate power output at the point of interconnection? Does it take into account estimated losses?
19. Would any waste heat from the fuel cell facility be used for the building/campus internal use such as to provide or supplement domestic heating and/or hot water? Would the waste heat also provide on-site cooling/air conditioning as well?
20. What is the operational life of the facility? Does the fuel cell media have to be changed? If so, at what intervals?
21. Page 8 of the Petition notes that, "The Project will use natural gas from a utility pipeline distribution system for its fuel supply." Has EIP consulted with the natural gas utility regarding the adequacy of the existing pipeline to serve the fuel cell facility or whether upgrades would be required to the pipeline?

Public Safety

22. Does the amount of phosphoric acid in the fuel cell comply with the applicable state and federal regulations?
23. Please provide an Emergency Response Plan for the proposed facility in accordance with Public Act 11-101, An Act Adopting Certain Safety Recommendations of the Thomas Commission.

24. Please identify media to be used for pipe cleaning procedures at the proposed facility in accordance with Public Act 11-101, An Act Adopting Certain Safety Recommendations of the Thomas Commission.
25. Which National Fire Protection Association (NFPA) or other codes and standards apply to fuel cell construction, installation and/or modifications?
26. Provide the closest distance from the proposed fuel cell facility to the railroad tracks? How would the proposed fuel cell facility be protected from a train derailment?
27. Where would the natural gas supply and gas meter be located (such to final confirmation from the utility company)? If the natural gas supply line to one or more of the fuel cells is accidentally severed in the case of a train derailment, would there be any safety features to automatically shut off the gas supply to all of the fuel cells?
28. What is the distance and direction of the proposed facility to the nearest airport? Did the petitioner provide notification to the Federal Aviation Administration regarding the exhaust stacks as necessary/applicable?

Environmental

29. Is it correct to say that the fuel cell facility would consume no water and discharge no water under normal conditions? Would there be some water consumption infrequently when the temperature is over 86F? Estimate the water consumption rate for the fuel cell facility under such conditions if known (and applicable).
30. What is the distance and direction of the nearest residence from the proposed fuel cell facility?
31. What is the municipal zoning of the host property? What surrounding land uses are adjacent to the host property?
32. Is it correct to say that the entire project is located in the Federal Emergency Management Agency (unshaded) Zone X, an area outside of both the 100-year and 500-year flood zones?
33. Given that the project is largely indoors with only a small disturbance area at the Burritt Street Substation, is it correct to say that a DEEP General Permit is not required? Explain.

34. Natural gas has sulfur dioxide injected as an odorant. Please submit a desulfurization plan narrative for the proposed fuel cell facility containing the following information:
- a) Chemical reaction overview concerning what substances are produced from the desulfurization process, as well as plans for their containment and transport;
 - b) How much solid sulfur oxide would result from the desulfurization process, and methods and locations for containment, transport, and disposal;
 - c) Whether any of these desulfurization substances are considered hazardous, and if so, plans for the containment, transport, and disposal of hazardous substances;
 - d) Anticipated method of disposal for any other desulfurization substances; and
 - e) Whether any gaseous substances resulting from desulfurization can be expected to vent from the fuel cells, as well as the applicable DEEP limits regarding discharge of these gasses.

Air Emissions

35. Is methane (CH₄) broken down to zero in the reforming process? Is there some small amount of CH₄ emissions that would still occur?
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).
37. Page 6 of the Petition notes reductions in various greenhouse gasses in tons. For example, the carbon dioxide reduction is 762 tons. Page 11 of the Petition notes a net reduction of 2,330 tons of carbon dioxide annually due to the fuel cell power generation offsetting grid power. Please explain or reconcile the 2,330 tons versus the 762 tons. Is one annual and one is for a different time period?