STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

November 19, 2019

Justin Adams
Permitting Manager
Bloom Energy Corporation
4353 North First Street
San Jose, CA 95134

RE: **PETITION NO. 1387** – Bloom Energy Corporation petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a grid-side 10-megawatt (MW) fuel cell facility and associated equipment to be located at Eversource Energy's existing Judd Brook electric distribution substation, 160 Old Amston Road, Colchester, Connecticut.

Dear Mr. Adams:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than December 3, 2019. 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.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the December 3, 2019 deadline.

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 Bachman
Executive Director

MB/MP

c: Paul Evan, Bloom Energy Corporation

Petition No. 1387
Bloom Energy Corporation
160 Old Amston Road
Colchester, CT
Interrogatories

1. Has a power purchase agreement (PPA) with Eversource been executed for the proposed 10 MW facility? If not, when would the PPA be finalized? What is the length of the PPA, e.g. 20 years? What authority approves the power purchase agreement (PPA) for the facility, e.g. Public Utility Regulatory Authority? When does Bloom anticipate receiving approval of the PPA? Are there provisions for any extension of time in the PPA? Is there an option to renew?

2. The Petitioner proposes a mix of 300 kW and 250 kW fuel cell units. However, Exhibit 1 of the Petition includes a 250-kW fuel cell specifications sheet only. Please provide a specifications sheet for the 300-kW fuel cell unit.

3. Page 6 of the Petition notes that, "The Bloom Energy Servers will be configured in four (4) systems each capable of producing 2.5 MW of electricity, referred to hereinafter as Stamps(s)." Would each Stamp consist of five 300-kW units and four 250-kW units?

4. Referencing Drawing No. C1.1 under Exhibit 2 of the Petition, what is the 8-foot by 25-foot concrete gas pad to be used for? If it is to be used for natural gas equipment, why are no natural gas lines depicted as connecting to the concrete pad area?

5. Would any nitrogen cylinders be stored on site? If yes, what size cylinders and how many?

6. Referencing Drawing No. C1.1 under Exhibit 2 of the Petition, Reference Sheet Notes No. 26 states, "Proposed paved site access entrance with parking area for service vehicles." There does not appear to be a No. 26 depicted on this drawing. Would the only paved surface for this project be the "New Paved Apron" off of Old Amston Road?

7. Referencing Drawing No. G0.1 under Exhibit 2 of the Petition, Bloom Energy FAQ's, it states, "If utility provided power is lost for any reason, the fuel cell system will also stop producing power. The fuel cell system will remain in stand-by mode until it automatically senses the utility grid has been restored." Would the fuel cell facility then automatically re-start upon restoration of utility grid power?

8. Please identify the 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.

9. Referencing Exhibit 7 of the Petition, page 2 of the Acoustic Review notes that the proposed fuel cell facility would be a Class C emitter. Would the fuel cell facility be considered a Class B emitter per the Connecticut Department of Energy and Environmental Protection (DEEP) Noise Control Regulations? If yes, would any noise mitigation measures be required to comply with DEEP Noise Control Standards?

10. Is the project interconnection required to be reviewed by ISO-NE?

11. Page 6 of the Petition notes that the facility would require 3,456 gallons of water at start-up. Would the facility only require the water during the (one time) initial commissioning start-up, or every time the unit starts up? Would there be a constant or intermittent water consumption during normal operation?

12. Would construction of the proposed project impact any existing wells in the area or other groundwater given that the site is located within DEEP's Class GA and Class GAA water classification areas?

13. Is the proposed natural gas line extension onto Old Amston Road sized for the proposed facility only or for future expansion to provide service to customers on/off Old Amston Road? In case of an emergency, would the gas be turned off at the site or the main? When is the future gas main to be installed?

14. Would the proposed water line extension onto Old Amston Road be sized for only the proposed facility, or would it be able to support other nearby customers?

15. Would Bloom (or Eversource, as applicable) obtain the required permitting for off-site electrical, gas and water connections?

16. Referencing Drawing No. C1.1, a six-foot tall fence is proposed. Would a seven-foot fence be required to comply with the National Electrical Code or any other applicable codes? If yes, please revise Drawing Nos. G1.1 and C1.1 to reflect the fence height.

17. How would Bloom set the pipe into place and remove the old culvert? How would the replacement pipe be installed to ensure safe fish passage? Would Bloom file a Self-Verification form (or other permitting as applicable) with the U.S. Army Corps of Engineers for the culvert replacement?

18. Estimate the tree clearing area in acres to develop the project footprint on Drawing No. C1.1. Would grubbing occur up to the "Limits of Disturbance," or would tree stumps remain outside of the fenced compound area?

19. What is the host municipality's setback regulation from wetlands? Drawing No. C1.1 shows a 100-foot wetland buffer. The eastern portion of the project footprint is located within this 100-foot buffer. Please revise Drawing No. C1.1 to reflect the municipal wetland buffer.

20. Referencing Exhibit 8 of the Petition, would the proposed project be consistent with the 2015 U.S. Army Corps of Engineers Vernal Pool Best Management Practices?

21. Page 31 of the Petition notes that, "The construction of the proposed Facility will result in approximately 550 square feet of impact to an area mapped as Prime Farmland soils. The resultant impact of the project on approximately 6 acres of mapped Prime Farmland is less than 0.002%." Would the correct percentage be approximately 0.2 percent?

22. Page 14 of the Petition notes that, "[T]he facility would be located within an area of minimal flood hazard Zone X." Is this the "unshaded" or "shaded" Zone X?

23. Has the Petitioner submitted an application for a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (General Permit) to DEEP? If no, approximately when does Bloom anticipate filing for the General Permit?

24. Would there be lighting in use for nighttime work activities?

25. Identify the tallest proposed equipment to be installed within the fenced compound and estimate its height above grade.

26. Is the Eversource Judd Brook Substation a 23-kV/13.8-kV distribution substation with no connections to transmission (i.e. 69-kV or higher)? What is the status of the interconnection study and agreement? Was a study performed to confirm that Eversource's distribution system can handle the 10 MW output? What would happen during low load periods?