

**Petition No. 1078  
Amendment  
Response to Interrogatories  
August 18, 2017**

**Site Layout**

1. Page 6 of CTS Energy, LLC's (CTS) Request for Modification notes that, "[T]he project will consist of two 1.4 MW fuel cells and one 2.8 MW fuel cell, with a total potential capacity of 5.6 MW" Page 1 of the Environmental Assessment notes that, "The facility would include twin 2.8 MW Fuel Cell Energy DFC3000 Power Plants..." Please clarify. Is the DFC3000 now called the SureSource 3000, but is otherwise equivalent?

**ANSWER:**

The confusion is on the Petitioner's part, as there were discussions about different configuration scenarios as to the final configuration. The fuel cell configuration will be comprised of Two (2) SureSource 3000s with a combined output of 5 MW. The SureSource 3000 is the same as the former DFC 3000. The undersigned apologizes for the confusion.

**Safety**

2. Would bollards be used to protect the fuel cell facility from being accidentally struck by vehicles?

**ANSWER:**

Yes, Bollards will be utilized to protect the fuel cell facility.

**Stormwater**

3. Referencing page 2 of the Wetland Delineation Field Form, CTS notes that alternatives for storm water management for runoff from the proposed fuel cell facility include an infiltration system (e.g. gravel yard for fuel cell) or reconstruction of the collapsed storm water outfall with the installation of a plunge pool (set back from the bank of the Podunk River). Which storm water management option would CTS pursue?

**ANSWER:**

The Petitioner proposes to implement the former option, utilizing the 2' gravel perimeter of the fuel cell yard to manage site storm water. As discussed in the Petition, the existing drainage patterns will not be altered by the Project and post-development peak discharge rates will be equal to or slightly less than what occurs today. Rehabilitation of the collapsed storm water outfall would be an appropriate activity during redevelopment of the larger underlying parcel.

**Construction**

4. If the proposed facility amendment or relocation 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?

**ANSWER:**

Based on receipt of permits in September 2017, construction is expected to commence by December 2017 with plant completed and in service by September 2018.

Typical work hours will be 7 am to 3:30 pm weekdays. Some days will require work until 5 pm. It is not anticipated that any work will be required on weekends.

**Service Life**

5. What is the operational life of the facility?

**ANSWER:**

The SureSource 3000 Unit has a service life of 25 years.

**Benjamin S. Proto, Jr./s/**

Benjamin S. Proto, Jr.  
Attorney for Petitioners