



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

February 18, 2016

Dmitriy Kamenetskiy, Project Manager
Fuel Cell Energy, Inc.
3 Great Pasture Road
Danbury, CT 06810

RE: **PETITION NO. 1214** – Groton Fuel Cell 1, LLC petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is required for the construction, maintenance, and operation of a 5.6 megawatt fuel cell combined heat and power electric generating facility located at the Pfizer Groton campus, 445 Eastern Point Road, Groton, Connecticut.

Dear Mr. Kamenetskiy:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than February 25, 2016. 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 send a copy via electronic mail. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies 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.

Yours very truly,

Melanie Bachman
Acting Executive Director

MB/MP

c: Jennifer D. Arasmowicz, Esq., Vice President, Managing Counsel, FuelCell Energy, Inc.
Robert L. Berchem, Esq., Berchem, Moses & Devlin, P.C.
Stephen W. Studer, Esq., Berchem, Moses & Devlin, P.C.
Council Members



CONNECTICUT SITING COUNCIL
Affirmative Action / Equal Opportunity Employer

Petition No. 1214
Groton Fuel Cell 1, LLC
445 Eastern Point Road
Groton, CT
Interrogatories

1. Approximately when did Groton Fuel Cell 1, LLC (GFC or Petitioner) first have discussions with Pfizer regarding a possible fuel cell at the Pfizer Groton campus?
2. On page 2 of the Petition, the Petitioner notes that, "The City of Groton has expressed no concerns regarding the Project." If the City of Groton has expressed any concerns since the filing of the Petition, please indicate such concerns as an update.
3. Has the Petitioner received any comments or concerns from the adjacent Town of Groton? Explain.
4. Did the Petitioner receive a written response from the State Historic Preservation Office regarding the Project Review Cover Form that was submitted? If yes, provide a copy of such correspondence.
5. GFC notes that the noise standards would be met at the nearest residential properties. Would the noise standards also be met at any abutting industrial properties as well to ensure compliance at all of the boundaries of the subject (Pfizer) property?
6. Would the natural gas-fired start-up burner as noted on page 10 of the Petition have a negligible effect on the fuel cell facility's overall pounds of CO₂ per megawatt-hour emissions because, as a baseload unit, start-ups would be infrequent? If no, explain how it would impact the overall CO₂ emissions rate.
7. On page 11 of the Petition, is the "Additional CO₂ avoided from the generation of steam using waste heat" essentially an estimate of the CO₂ that would be emitted by combustion of natural gas in a conventional natural gas-fired boiler and thus would be avoided by using the fuel cell's waste heat for steam?
8. If approved, approximately when would construction commence and what would be the estimated in-service date for the project?
9. What is the height above ground level (agl) of the tallest structure or equipment in the project footprint? Also provide the estimated height agl of the heat recovery steam generator building.

10. Would the proposed six-foot high fence be chain link? While two-inch mesh is a common size, what mesh size is being proposed?
11. Would bollards be used to protect the fuel cell facility from being accidentally struck by vehicles or is the proposed fence intended to protect the fuel cell facility?
12. Does the existing grass area for the proposed fuel cell facility have any trees six inches diameter or greater that would be removed to construct the project? If yes, how many?
13. Is nitrogen used in the normal operation of the fuel cell, or it is only used as an emergency safety measure to fill the natural gas pressurized portions of the facility with an inert gas during an emergency shutdown? Explain.
14. 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.
15. What statutes and/or regulations govern fuel cell emissions for the proposed facility?
16. 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).
17. Provide information regarding available technologies to reduce greenhouse gas emissions from the proposed facility.
18. Could offsets be used to mitigate air emissions impacts from the facility?
19. Discuss other mitigation techniques that could be used to offset air emissions from the proposed facility e.g. planting trees. If planting trees is listed as an option, estimate the number and size of trees required.
20. 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.