



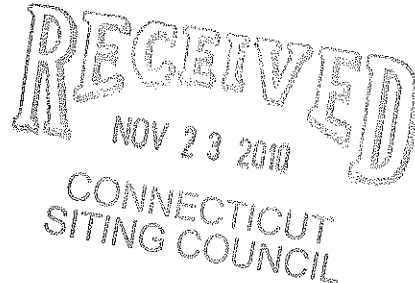
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November 19, 2010

VIA ELECTRONIC MAIL AND HAND DELIVERY

Linda Roberts  
Executive Director  
Connecticut Siting Council  
10 Franklin Sq.  
New Britain, CT 06051



**Re: Docket NT-2010 - Reopening of Final Decisions Pursuant to CGS § 4-181a(b) for Jurisdictional Natural Gas-Fired Electric Generating Facilities Under CGS § 16-50i(a)(3) and CGS § 16-50k(a) limited to Council Consideration of Changed Conditions and the Attachment of Conditions to the Certificates and Declaratory Rulings Consistent with the Findings and Recommendations in the Final Report Issued by the Kleen Energy Plant Investigation Review Panel (Nevas Commission) and the findings and Recommendations in the Executive Report Issued by the Thomas Commission**

Dear Ms. Roberts:

PPL Energy Services Holding LLC hereby submits an original and 15 copies of its responses to the Siting Council's interrogatories issued in the above-referenced Docket. A copy of these responses are also being sent to you and the address [siting.council@ct.gov](mailto:siting.council@ct.gov) as a .pdf file, pursuant to the Siting Council's request. If you have any questions concerning this submittal, please contact the undersigned at your convenience.

Please return a date-stamped copy of this filing in the enclosed envelope. Thank you in advance for your assistance.

Respectfully submitted  
PPL Energy Services Holding LLC

By: \_\_\_\_\_

John J. Mazzali

A handwritten signature in black ink, appearing to read "John J. Mazzali", written over a horizontal line.

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

RE-OPENING OF FINAL DECISIONS :  
PURSUANT TO C.G.S. §4-181a(b)  
FOR JURISDICTIONAL NATURAL GAS-FIRED  
ELECTRIC GENERATING FACILITIES  
UNDER C.G.S. § 16-50i(a)(3) AND C.G.S. §  
16-50k(a)

DOCKET NT-2010

NOVEMBER 23, 2010

**PPL ENERGY SERVICES HOLDING LLC'S INTERROGATORY RESPONSES TO  
CONNECTICUT SITING COUNCIL'S FIRST SET OF INTERROGATORIES**

PPL Energy Services Holding LLC ("PPL Energy Services") submits these the following interrogatory responses to the Connecticut Siting Council's first set of interrogatories dated October 28, 2010.

**INTERROGATORY RESPONSES:**

**Q1. If the facility has already been constructed, what versions of the NFPA standards were utilized?**

A1. The PPL Energy Services Facility (the "Facility") is described more fully in the materials included in Siting Council Petition 711, and is the subject of the responses to these interrogatories. When constructed, the Facility obtained permits in accordance with state and local building codes in existence at the time of its construction.

The "BOCA National Building Code/1996 as amended, altered or deleted by the State Building Code - 1999 Connecticut Supplement with 2004 Amendment ("State Code") was utilized to construct the Facility. Various NFPA standards are reference in the State Code. The NFPA standards that applied to the Facility were the versions of NFPA Sections 30, 51B, 54, 70, 71, 72, 85, 101, 780, 853, found in the State Code referenced above.

**Q2. If the facility has yet to be constructed, what versions of the NFPA standards will be utilized?**

A2. The PPL Energy Services Facility is fully constructed, and there are no plans for

significant modifications to the Facility at this time.

**Q3. How would recommendation #6, "Recommendation as to adoption of codes" in the Thomas Commission Executive Report affect the facility?**

A3. PPL Energy Services does not believe that recommendation #6, as to the adoption of revised building codes, should have any impact on the PPL Energy Services Facility because PPL Energy Services does not read the Thomas Commission Report as requiring the retroactive application of building codes to existing facilities, particularly in light of the fact that no member of the public was permitted to provide comments to the draft of the Thomas Commission Report before it became final, and that no formal rulemaking procedures have been initiated with respect to such retroactive application of building codes.

The PPL Energy Services Facility is a fully constructed, permitted fuel cell power plant that has been in existence for nearly six years. PPL Energy Services sees nothing in the Thomas Commission's Report which would suggest that the Thomas Commission meant to retroactively apply building code standards to existing facilities. For the Thomas Commission to do so would be a substantial departure from customary practice for how building codes are developed in this State and in the industry.

Ordinarily, a project receives its building permits and is responsible for building a facility in accordance with the standards that were in effect at the time the building permit was issued. Such standards would include any applicable NFPA standards, as adopted by Connecticut or local regulation at the time the building permits were issued. Such standards would include any applicable NFPA standards, as adopted by Connecticut or local regulation at the time the building permits were issued. If new construction were to take place at the PPL Energy Services Facility, it would obviously need to be done in accordance with applicable building codes at the time of permitting; however, no such construction is anticipated by PPL Energy Services at this time.

**Q4. How would the following codes affect construction or modification of the facility:**

- a. NFPA 37 (2010 edition);
- b. NFPA 54 (2009 edition);
- c. NFPA 54 Temporary Interim Amendment 09-3 (August 25, 2010);
- d. NFPA 850 (2010 edition);
- e. NFPA 853 (2010 edition);
- f. ASME B31; and
- g. ASME B31.1 Appendices IV and V.

A4. The PPL Energy Services Facility is not currently under construction, nor is any modification of the facility currently contemplated. PPL Energy Services therefore does not believe that these new codes would have any impact on its facility. If PPL Energy Services wishes to modify its facility in the future, the scope of the modification will likely determine the extent, if any, of the effect of implementation of the codes listed above. It should be noted, however, that the PPL Energy Services Facility was constructed in accordance with the ASME standards referenced in subsection f. and g. of this Interrogatory.

**Q5. What is useful lifespan of the natural gas piping/pipelines located within and to the facility?**

A5. For Interrogatories 5-13, PPL Energy Services only has knowledge concerning the 100 linear feet of natural gas piping/pipelines that PPL Energy Services owns and/or controls. Accordingly, the answers to Interrogatories 5-13 will be limited to such piping/pipelines only.

The PPL Energy Services Facility was designed for a 15 year life span. With proper inspection and maintenance, the lifespan of the piping/pipelines should be significantly beyond this period.

**Q6. Would the natural gas piping/pipelines within and to the facility need to be replaced during the life of the facility?**

A6. The natural gas piping/pipelines within and to the PPL Energy Services Facility are anticipated to have, at a minimum, the same useful life as the rest of the Facility. Accordingly, it is not anticipated that any natural gas piping/pipelines would need to be replaced during the life of the Facility. Moreover, as described above, the Facility was

constructed pursuant to the standards found in ASME B31.1, 1998 edition. Section 102.2.3 of that standard states that "A piping system shall be considered safe for operation if the maximum sustained operating pressure and temperature which may act on any part or component of the system does not exceed the maximum pressure and temperature allowed by this code for that particular part or component."

**Q7. Do you foresee any circumstances that would require replacement of a section of natural gas piping/pipeline within and to the facility?**

A7. The natural gas piping/pipelines within and to the PPL Energy Services Facility are anticipated to have, at a minimum, the same useful life as the rest of the Facility. Accordingly, replacement of the natural gas piping/pipeline is not anticipated at this time.

However, if the PPL Energy Services Facility were to be expanded and/or modified, it is possible that natural gas piping/pipelines would need to be added and/or replaced. Were such an expansion or modification to happen, however, PPL Energy Services would be subject to review of such expansion or modification in accordance with all applicable laws and regulations in force at the time of such expansion or modification.

**Q8. If so, would a new section of natural gas piping/pipeline within and to the facility be installed and require cleaning?**

A8. If the PPL Energy Services Facility were to be expanded or modified, and if such expansion or modification included the addition or replacement of natural gas piping/pipelines, such piping/pipelines would need to be cleaned in accordance with the specifications of the manufacturers of the equipment utilizing such natural gas, as well as applicable state and federal regulatory requirements that are in place at the time of expansion/modification. PPL Energy Services is mindful of the fact that pursuant to the Governor's Executive Order Number 45 (dated September 22, 2010), natural gas is no longer permitted to be used to clean such piping/pipelines, and if such cleaning were necessary, PPL Energy Services would utilize a method of cleaning permitted by the State of Connecticut and applicable standards.

**Q9. What type of material is the natural gas piping/pipeline within and to the facility composed of?**

A9. The natural gas piping/pipeline within and to the PPL Energy Services Facility is composed of 150 pound carbon steel ASTM A53 grade B (domestic gas service).

**Q10. How many linear feet of natural gas piping/pipeline are located within and to the facility?**

A10. There are approximately 100 linear feet of natural gas pipes located within and to the PPL Energy Services Facility.

**Q11. What is operating pressure (psig) of the natural gas piping/pipeline within and to the facility?**

A11. The natural gas pipes located within and to the PPL Energy Services Facility operate at 15 psig (domestic gas service).

**Q12. What is the nominal pipe size in inches within and to the facility?**

A12. The natural gas pipe is 1 inch.

**Q13. What is the length in feet of piping/pipeline that requires/required purging within and to the facility?**

A13. Approximately 100 linear feet of piping/pipeline within the PPL Energy Services Facility required cleaning prior to the introduction of gas to the Fuel Cell. No further cleaning is anticipated at this time.

Respectfully Submitted,  
PPL Energy Services Holdings

By: 

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