

280 Trumbull Street  
Hartford, CT 06103-3597  
Main (860) 275-8200  
Fax (860) 275-8299  
jmiranda@rc.com  
Direct (860) 275-8227

Also admitted in District of  
Columbia and Massachusetts

*Via Hand Delivery and Electronic Mail*

November 15, 2010

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

Re: **Docket No. NT-2010: Reopening of Final Decisions Pursuant to C.G.S. § 4-181(a)(b) for Jurisdictional Natural Gas-Fired Electric Generating Facilities Under C.G.S. § 16-50i(a)(3) and C.G.S. § 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:

Enclosed are an original and fifteen (15) copies of the Responses of FuelCell Energy, Inc. to Connecticut Siting Council Pre-Hearing Interrogatories in connection with the above-referenced proceeding.

Please feel free to contact me if you have any questions or require additional information. Thank you.

Sincerely,



Joey Lee Miranda

Enclosures

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**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

IN RE:	:	
	:	
REOPENING OF FINAL DECISIONS	:	DOCKET NO. NT-2010
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) 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	:	NOVEMBER 15, 2010

**RESPONSES OF FUELCELL ENERGY, INC. TO**  
**CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES**

On October 28, 2010, the Connecticut Siting Council (“Council”) issued Pre-Hearing Interrogatories to FuelCell Energy, Inc.<sup>1</sup> (“FCE”) in connection with the above-captioned proceeding. Below are FCE’s responses.

Question No. 1

Is the fuel cell unit stationary or mobile?

Response

Stationary fuel cell units are installed at the testing facility.

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<sup>1</sup> For additional information regarding the project, see Petition No. 923.

Question No. 2

If the fuel cell unit has already been constructed and installed, what NFPA standards were applied to the construction and installation?

Response

As part of its product development process, FCE tests each new product for design and documentation validation. The products are tested using FCE's testing facility for a two to three month period during which time the products generate electricity that is used on-site. The installations associated with the fuel cell testing facility include the fuel cell modules, electrical balance of plant, main process skid, desulfurization skid and water treatment skid. The installations are governed by numerous standards and codes including the American National Safety Institute/CSA Standards ("ANSI/CSA") FC-1 (Stationary Fuel Cell Power Requirements) and National Fire Protection Association ("NFPA") 853 (Standard for the Installation of Stationary Fuel Cell Power Systems) and NFPA 54 (National Fuel Gas Code).

Question No. 3

If the fuel cell unit has yet to be constructed and installed, what NFPA standards will apply to the construction and installation?

Response

See response to Question No. 2.

Question No. 4

How would recommendation #6, "Recommendation as to adoption of codes" in the Thomas Commission recommendations affect the facility?

Response

Since recommendation #6 simply calls for the adoption of various standards that FCE already employs, as appropriate, through the use of good engineering practices, it will not have a significant effect on the design, construction or operation and maintenance of the installations.

Question No. 5

How do the following codes affect construction, installation or modification of the unit:

- 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.

Response

The test facility has been, is and will be designed, constructed, operated and maintained in accordance with all applicable codes and standards, including NFPA 853, NFPA 54 and NFPA 54 Temporary Interim Amendment 09-3, and ASME B31 (specifically, as applicable, ASME B31.1, B31.3 and B31.8). *See also* Response to Question No. 2. Neither NFPA 37 nor NFPA 850 is applicable to fuel cell installations.

Question No. 6

What is the length of the natural gas piping required for installation and operation?

Response

FCE installed approximately 40 feet of natural gas piping for the test facility.

Question No. 7

What is the operating pressure (psig) of the natural gas piping?

Response

The operating pressure of the natural gas piping installed by FCE is 15 psig.

Question No. 8

What is useful lifespan of the natural gas piping?

Response

The useful lifespan of the natural gas piping installed by FCE is expected to be significantly greater than 30 years.

Question No. 9

Would the natural gas piping/pipeline need to be replaced during the life of the facility?

Response

FCE does not anticipate that the natural gas piping it installed will need to be replaced during the life of the facility.

Question No. 10

Do you foresee any circumstances that would require replacement of a section of natural gas piping?

Response

At this time, FCE does not anticipate that any circumstances would require it to replace any of the natural gas piping that it installed. However, it is possible that some currently unforeseen circumstance could lead to a major modification of the facility (e.g., major upgrade of the fuel cell product) that would require replacement of the natural gas piping installed by FCE.

Question No. 11

If so, would a new section of natural gas piping be installed and require cleaning?

Response

In the unlikely event that there is a major modification to the facility, a new section of natural gas piping, which would require cleaning, may need to be installed.

Question No. 12

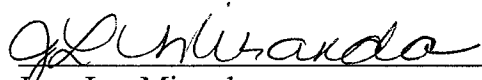
What type of material is the natural gas piping composed of?

Response

FCE used schedule 40 carbon steel for the natural gas piping that it installed.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of November 2010, a copy of the foregoing was sent via electronic mail or first class mail to all participants of record.

  
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Joey Lee Miranda