Commonwealth Fusion Systems

117 Hospital Road, Devens, MA 01434, USA

October 28, 2026

Neil Angus
Director, Devens Enterprise Commission
33 Andrews Parkway
Devens, MA 01434

Dear Mr. Angus,

This letter responds to the air quality comments and concerns provided by the Devens Enterprise Commission ("DEC") to Commonwealth Fusion Systems, LLC ("CFS") regarding the operating profile of the process heaters proposed for the Fusion Power Systems Research Center (CFS-4), as described in CFS's Massachusetts Department of Environmental Protection ("MassDEP") air quality permit.

The MassDEP air permit was intentionally developed with sufficient operating flexibility to allow CFS to operate the system for longer periods than currently anticipated, if necessary, to meet its research objectives. These permitted operating hours represent an allowable maximum and are not representative of CFS's anticipated operations. CFS expects to operate the process heaters substantially below the permitted hours, on an intermittent, as-needed basis for research rather than on a nearly continuous basis.

As described throughout the CFS-4 permitting process, CFS expects to operate the facility intermittently, frequently at less than full load, and only for the duration necessary to complete its finite research mission. Based on the current project schedule and anticipated research needs, CFS expects the following operating profile:

- **2028:** Up to 1,440 heater-hours (7% of permitted annual maximum)
- **2029:** Up to 2,030 heater-hours (10% of permitted annual maximum)
- **2030:** Up to 2,030 heater-hours (10% of permitted annual maximum)
- **2031:** Up to 6,800 heater-hours (33% of permitted annual maximum)
- **2032:** Up to 2,030 heater-hours (10% of permitted annual maximum)
- **2033:** Facility mission complete

The MassDEP permit allows up to 6,769 hours of operation per heater during a 12-month period, or 20,307 total heater-hours for the three heaters. CFS does not expect to approach this permitted maximum.

The operating hours above are based on the current project schedule and the anticipated time required to meet CFS's research objectives. While these expectations may need to be adjusted as the project progresses, CFS does

not anticipate operating the facility anywhere near the nearly continuous level allowed by the permit. If CFS's anticipated operating profile changes materially or earlier than 2028, CFS will notify the DEC so that future permitting and operational considerations can be addressed appropriately.

As requested, CFS's air quality consultant will demonstrate that operation at less than full load will reduce the overall annual emission potential while continuing to meet applicable short-term emission limits at 25%, 50%, and 75% load, including the elevated emission rates typically associated with startup and shutdown.

CFS recognizes the importance of clarifying its commitment to the operational profile presented to the DEC as part of the Level 2 permit process. CFS remains confident that it can achieve its research objectives within the operating profile described above.

We appreciate the Commission's attention to and support of this project and remain available to discuss any aspect of the proposed operations.

Sincerely,



Kyle Metzroth, Project Manager, CFS-4 Project
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