

September 22, 2020

**VIA ELECTRONIC MAIL**

Attorney Melanie Bachman  
Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

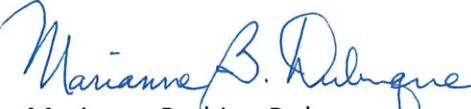
Re: **DOCKET NO. 490** - The United Illuminating Company application for a Certificate of Environmental Compatibility and Public Need for the Old Town Substation Rebuild Project that entails construction, maintenance and operation of a 115/13.8- kilovolt (kV) air-insulated replacement substation facility located on the existing Old Town Substation parcel at 282 Kaechele Place and two parcels immediately north totaling approximately 3 acres that are owned by The United Illuminating Company at 312 and 330 Kaechele Place, Bridgeport, Connecticut, and related transmission structure and interconnection improvements

Dear Attorney Bachman:

In connection with the above-referenced Docket No. 490, enclosed please find the Motion of The Connecticut Light and Power Company doing business as Eversource Energy for Party Status.

The original document will be mailed to the Council for its file.

Very truly yours,

  
Marianne Barbino Dubuque

MBD/mkw  
Enclosures  
cc: Service List dated July 10, 2020 (copy attached)

{W3255593}

**LIST OF PARTIES AND INTERVENORS**  
**SERVICE LIST**

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	<input checked="" type="checkbox"/> E-mail	The United Illuminating Company	<p>Bruce McDermott, Esq. Murtha Cullina LLP One Century Tower 265 Church Street New Haven, CT 06510-1220 (203) 772-7787 <a href="mailto:bmcdermott@murthalaw.com">bmcdermott@murthalaw.com</a></p> <p>Ronald Rossetti Manager – Electric Capital Projects The United Illuminating Company 100 Marsh Hill Road Orange, CT 06477 (203) 926-4517 <a href="mailto:Ron.rossetti@uinet.com">Ron.rossetti@uinet.com</a></p> <p>Samantha Marone Outreach Manager The United Illuminating Company 100 Marsh Hill Road Orange, CT 06477 (203) 499-3824 <a href="mailto:Samantha.marone@uinet.com">Samantha.marone@uinet.com</a></p>



Town Substation, in Bridgeport, CT and its Hawthorne Substation in Fairfield, CT. In addition, a third Eversource 115-kV transmission line (the 1714 Line), which presently bypasses UI's existing Old Town Substation and connects UI's Trumbull Substation and Eversource's Weston Substation, will be re-routed to the new substation yard to accommodate a future connection to the Old Town Substation.

5. Eversource requests the right to participate as a party in this proceeding, including any modifications to the Project recommended by the Council and other participants in this proceeding. Eversource does not intend to cross-examine witnesses; however, Eversource plans to present pre-filed testimony regarding its proposed facilities and will be available to answer any questions about the new transmission line support structures, transmission line conductors, and associated items that Eversource will own. Also, Eversource may wish to file written comments or a brief on issues affecting its interests. If the Council grants the Certificate, UI's substation would be directly interconnected with Eversource's 1710 and 1222 transmission lines, and these transmission lines and interconnection facilities would supply electricity to the Old Town Substation. The 1714 Line would be re-routed through the substation yard as a provision for future connection to UI's substation. Eversource will be specifically affected by the Council's decision on the Project because the Project would include Eversource's (i) construction of four transmission line structures, installation of associated transmission line conductors, and communication and shield wires that Eversource would continue to own, operate and maintain (ii) removal of two existing Eversource transmission line structures, conductors and wires, and (iii) appropriate interconnection of the Old Town Substation into Eversource's transmission network.

6. Section 4-177a of Conn. Gen. Stat. authorizes the Council to grant party status in a contested case if a person submits a written petition stating, "facts that demonstrate that the petitioner's legal rights, duties or privileges shall be specifically affected by the agency's decision." For the reasons explained above, the Company respectfully submits that its participation as a party in this proceeding satisfies the criteria in §§ 4-177a and 16-50n of Conn. Gen. Stat. and § 16-50j-14 of R.C.S.A.

7. Correspondence and other communications in regard to this matter should be served upon the following persons:

Kathleen M. Shanley  
Manager - Transmission Siting  
Eversource Energy Service Company  
P.O. Box 270  
Hartford, CT 06141-0270  
Telephone (860) 728-4527  
Electronic mail: [kathleen.shanley@eversource.com](mailto:kathleen.shanley@eversource.com)

Jeffery D. Cochran  
Senior Counsel  
Eversource Energy Service Company  
P.O. Box 270  
Hartford, CT 06141-0270  
Telephone (860) 665-3548  
Fax (860) 665-5504  
Electronic mail: [jeffery.cochran@eversource.com](mailto:jeffery.cochran@eversource.com)

Marianne Barbino Dubuque  
Carmody Torrance Sandak & Hennessey LLP  
P.O. Box 1110  
Waterbury, CT 06721-1110  
Telephone: 203-578-4218  
Electronic mail: [mdubuque@carmodylaw.com](mailto:mdubuque@carmodylaw.com)

WHEREFORE, Eversource respectfully requests that it be granted the right to participate in this proceeding as a party.

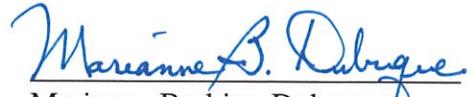
Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY  
DOING BUSINESS AS EVERSOURCE ENERGY

By:   
Marianne Barbino Dubuque  
Carmody Torrance Sandak & Hennessey LLP  
P.O. Box 1110  
Waterbury, CT 06721-1110  
Telephone: 203-578-4218  
Electronic mail: [mdubuque@carmodylaw.com](mailto:mdubuque@carmodylaw.com)  
Its Attorney

## CERTIFICATION

I hereby certify that on this 22<sup>nd</sup> day of September, 2020, that one (1) copy of the foregoing document was sent via electronic mail to all persons on the July 10, 2020 Service List for this proceeding.

  
Marianne Barbino Dubuque