

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

RE: THE CONNECTICUT LIGHT & POWER :
COMPANY D/B/A EVERSOURCE ENERGY :
APPLICATION FOR A CERTIFICATE OF :
ENVIRONMENTAL COMPATIBILITY AND :
PUBLIC NEED FOR THE FROST BRIDGE TO :
CAMPVILLE 115-KILOVOLT (kV) ELECTRIC :
TRANSMISSION LINE PROJECT THAT :
TRAVERSES THE MUNICIPALITIES OF :
WATERTOWN, THOMASTON, LITCHFIELD, AND :
HARWINTON, WHICH CONSISTS OF (A) :
CONSTRUCTION, MAINTENANCE AND :
OPERATION OF A NEW 115-kV OVERHEAD :
ELECTRIC TRANSMISSION LINE ENTIRELY :
WITHIN EXISTING EVERSOURCE RIGHT-OF- :
WAY AND ASSOCIATED FACILITIES :
EXTENDING APPROXIMATELY 10.4 MILES :
BETWEEN EVERSOURCE'S EXISTING FROST :
BRIDGE SUBSTATION IN THE TOWN OF :
WATERTOWN AND EXISTING CAMPVILLE :
SUBSTATION IN THE TOWN OF HARWINTON; :
(B) RELATED MODIFICATIONS TO FROST :
BRIDGE SUBSTATION AND CAMPVILLE :
SUBSTATION; AND (C) RECONFIGURATION OF :
A 0.4 MILE SEGMENT OF TWO EXISTING 115-kV :
ELECTRIC TRANSMISSION LINES ACROSS THE :
NAUGATUCK RIVER IN THE TOWNS OF :
LITCHFIELD AND HARWINTON WITHIN THE :
SAME EXISTING RIGHT-OF-WAY AS THE NEW :
115-kV ELECTRIC TRANSMISSION LINE. :

DOCKET NO. 466

JANUARY 20, 2016

MOTION OF THE
OFFICE OF CONSUMER COUNSEL
FOR PARTY STATUS

Pursuant to Connecticut General Statutes ("General Statutes") §§ 4-177a(a) and 16-2a(a), the Office of Consumer Counsel ("OCC") hereby respectfully requests that the

Connecticut Siting Council (“Siting Council”) designate OCC as a party to the above-captioned proceeding. In support of this Motion, OCC states the following:

1. General Statutes § 4-177a(a) provides that a person may be granted party status in administrative proceedings, such as those of the Siting Council, if the person timely files a written petition stating facts that demonstrate that the petitioner’s legal rights, duties, or privileges will be specifically affected by the agency’s decision in the case.
2. This motion is timely under General Statutes § 4-177a(a) given that the Siting Council has not yet scheduled a hearing date.
3. OCC is the statutorily designated representative of Connecticut utility consumers. Pursuant to General Statutes § 16-2a(a), OCC is authorized to appear and participate in any regulatory or judicial proceedings in which the interests of such consumers may be involved, or in which matters affecting utility services rendered or to be rendered in Connecticut may be involved. The present Siting Council docket is such a regulatory proceeding.
4. In this proceeding, on December 22, 2015, the Connecticut Light and Power Company doing business as Eversource Energy (“Eversource”) filed an Application with the Siting Council for a Certificate of Environmental Compatibility and Public Need for the Frost Bridge to Campville 115-kilovolt (kV) electric transmission line project that traverses the municipalities of Watertown, Thomaston, Litchfield, and Harwinton, which consists of (a) construction, maintenance and operation of a new 115-kV overhead electric transmission line entirely within existing Eversource right-of-way and associated facilities extending approximately 10.4 miles between Eversource’s existing Frost Bridge Substation in the Town of Watertown and existing Campville Substation in the Town of Harwinton; (b) related modifications to Frost Bridge Substation and Campville Substation; and (c) reconfiguration of a 0.4 mile segment of two existing 115-kV electric transmission lines across the Naugatuck River in the Towns of Litchfield and Harwinton within the same existing right-of-way as the new 115-kV electric transmission line (“Application”).
5. The Siting Council’s decision in this proceeding will affect the interests of Connecticut electric consumers and electric utility services to be rendered in this State. Specifically, this project will affect the reliability of the electric supply available to Connecticut consumers and also the rates charged to Connecticut ratepayers. The Application states that Eversource is proposing the project to

“bring the electric supply system in northwest Connecticut into compliance with applicable national and regional reliability standards and criteria by eliminating potential thermal overloads and voltage violations identified in studies conducted by Independent System Operator New England (ISO-NE)” Application, Executive Summary, at ES-1. The Application states that the estimated capital cost of the project is approximately \$51 million. *See id.* at ES-10. Eversource will seek to recover costs in regulated rates, which, if approved, will be imposed on Connecticut ratepayers, at least in part.

6. Eversource is the applicant in this matter. OCC has a long history of advocating for the interests of Eversource customers, before the Connecticut Public Utilities Regulatory Authority (formerly the Department of Public Utility Control), and otherwise. OCC’s application for party status in the present proceeding is consistent with that history.
7. OCC, on behalf of the electric consumers it represents, has legal rights, duties, and privileges that will be affected by the outcome of this proceeding. This consumer interest cannot be adequately represented by any other party.
8. OCC seeks full rights as a party in this proceeding, including the rights to conduct discovery, introduce and review evidence, cross-examine witnesses, submit briefs, and present argument.
9. OCC’s participation in this proceeding is in the public interest and good cause exists to grant this Motion. OCC’s participation will not impair the interests of justice or impair the orderly conduct of the proceeding.
10. OCC’s participation in this proceeding will not prejudice any other party or intervenor. For instance, OCC intends to execute any confidentiality agreements that may be necessary for its participation in this proceeding.
11. Communications concerning this proceeding should be served upon the following persons at OCC:

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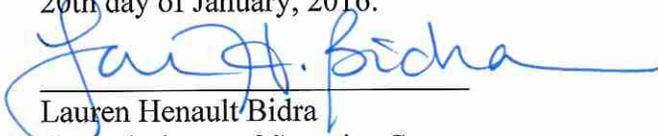
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Respectfully submitted,

ELIN SWANSON KATZ
CONSUMER COUNSEL

By: 
Lauren Henault Bidra
Staff Attorney

I hereby certify that a copy
of the foregoing has been mailed,
electronically sent and/or
hand-delivered to all known
parties and intervenors of record this
20th day of January, 2016.


Lauren Henault Bidra
Commissioner of Superior Court