

January 28, 2020

VIA E-MAIL and HAND DELIVERY

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

Re: **PETITION NO. 1310A** – Quinebaug Solar, LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 50 megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut

Dear Attorney Bachman:

On behalf of The Connecticut Light and Power Company d/b/a Eversource Energy (“Eversource”), in accordance with the Siting Council’s Procedures for Filing Proprietary Information Under Protective Order (Procedures), I submit with this letter Eversource’s Response to CSC Interrogatory #8, together with a Motion for Protective Order and the required supporting documentation.

As required by the Procedures, one copy of the document listed above has been placed in a sealed envelope bearing the document’s descriptive title and labeled “CONFIDENTIAL – CEII **Subject to Non-Disclosure Agreement and Protective Order** - Connecticut Siting Council Petition No. 1310A Confidential Filing Submitted By The Connecticut Light and Power Company Doing Business As Eversource Energy January 28, 2020 Eversource’s Response to CSC Interrogatory #8. This envelope is not to be opened and the contents to be displayed or revealed except pursuant to the pertinent Protective Order issued in Petition No. 1310A.”

As further required by the Procedures, I enclose an original and 15 copies of this letter and the following documents in consecutive order:

{W3186301}

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- a. A Motion for Protective Order and a Memorandum of Law describing the legal standards upon which the motion is based;
- b. An affidavit of Jacob E. Lucas stating specifically why the information should be protected;
- c. A proposed Protective Order for signature by the Presiding Officer;
- d. A proposed Non-Disclosure Agreement for signature by requesters of the proprietary information; and
- e. A proposed Request for Information for completion by persons seeking access to the proprietary information.

Very truly yours,


Marianne Barbino Dubuque

MBD/mkw
Enclosures

cc: (with copies of encls. (a) – (e)): CSC Service List dated January 15, 2020

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 | Quinebaug Solar, LLC | <p>David W. Bogan, Esq. Locke Lord LLP 20 Church Street Hartford, CT 06103 Phone: (860) 541-7711 Fax: (866) 877-2145 david.bogan@lockelord.com</p> <p>Kathryn E. Boucher, Esq. Locke Lord LLP 20 Church Street, 20th Floor Hartford, CT 06103 Phone: (860) 541-7714 kathryn.boucher@lockelord.com</p> <p>Hagen Lee Quinebaug Solar, LLC c/o NextEra Energy Resources, LLC 700 Universe Boulevard, E5E/JB Juno Beach, FL 33408 Phone: (561) 694-4012 hagen.lee@nexteraenergy.com</p> |
| Party (Approved 9/19/17) | <input checked="" type="checkbox"/> E-mail | Troy and Meghan Sposato 192 Wauregan Road Canterbury, CT 06331 megsposato@yahoo.com tsposato9@yahoo.com | |
| Party (Approved 1/2/20) | <input checked="" type="checkbox"/> E-mail | The Connecticut Light and Power Company d/b/a Eversource Energy | <p>Marianne Barbino Dubuque, Esq. Carmody Torrance Sandak Hennessey LLP 50 Leavenworth Street P.O. Box 1110 Waterbury, CT 06702 Phone: (203) 578-4218 MDubuque@carmodylaw.com</p> <p>Kathleen M. Shanley Manager-Transmission Siting Eversource Energy P.O. Box 270 Hartford, CT 06141-0270 Phone: (860) 728-4527 Kathleen.shanley@eversource.com</p> |

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|--|--|--|---|
| | | | Jeffery D. Cochran Senior Counsel Eversource Energy P.O. Box 270 Hartford, CT 06141-0270 Phone: (860) 665-3548 jeffery.cochran@eversource.com |
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CONNECTICUT SITING COUNCIL

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| <p>PETITION NO. 1310A – Quinebaug Solar, LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 50 megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut</p> | <p>PETITION NO. 1310A</p> <p>January 27, 2020</p> |
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AFFIDAVIT OF JACOB E. LUCAS

STATE OF CONNECTICUT)
)
COUNTY OF HARTFORD)

ss: Hartford

January 27, 2020

Jacob E. Lucas, being duly sworn, states:

1. I am the Manager, Interconnections and Services, Transmission, for Eversource Energy Service Company, which provides transmission planning services to The Connecticut Light and Power Company d/b/a Eversource Energy (“Eversource”).
2. My office is located at 56 Prospect Street in Hartford, Connecticut.
3. I am over the age of eighteen years and understand the obligations of making statements under oath.
4. I am familiar with Petition No. 1310A, now pending before the Connecticut Siting Council (Council), and with Eversource’s Response to CSC Interrogatory #8.
5. I submit this affidavit in support of the Motion for Protective Order filed by Eversource contemporaneously herewith requesting the issuance by the Council

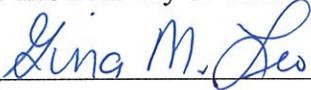
of a Protective Order with respect to Eversource's Response to CSC Interrogatory #8.

6. Eversource's Response to CSC Interrogatory #8 provides confidential information concerning weaknesses and vulnerabilities in the Connecticut transmission system, the disclosure of which may result in a risk of harm to facilities owned by a public service company.



Jacob E. Lucas

Subscribed and sworn to before
me this 27th day of January, 2020



Notary Public
My Commission Expires:

GINA M. LEO
NOTARY PUBLIC
MY COMMISSION EXPIRES FEB. 28, 2021