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September 29, 2020

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition No. 1406 – Doosan Fuel Cell America, Inc. Petition for a Declaratory Ruling, Pursuant to Connecticut General Statutes §4-176 and §16-50k, for the Proposed Construction, Maintenance and Operation of a Grid-side 9.66-Megawatt Fuel Cell Facility and Associated Equipment to be Located at 600 Iranistan Avenue, Bridgeport, Connecticut, and Associated Electrical Interconnection to The United Illuminating Company's Existing Congress Street Substation

Dear Ms. Bachman:

Enclosed for filing with the Connecticut Siting Council (the "Council") is NuPower Bridgeport FC, LLC's motion for party status in the above-captioned petition.

Given the Council's modifications to its hard copy filing requirements as part of its response to the COVID-19 pandemic, by this letter, NuPower submits to the Council and the service list an electronic copy of the motion and one hard copy of the filing will be mailed to the Council's office.

Should the Council have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Bruce L. McDermott".

Bruce L. McDermott

Enclosure

cc: Service List

Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
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STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Doosan Fuel Cell America, Inc. Petition for a	:	Petition No. 1406
Declaratory Ruling, Pursuant to Connecticut	:	
General Statutes §4-176 and §16-50k, for the	:	
Proposed Construction, Maintenance and	:	
Operation of a Grid-side 9.66-Megawatt Fuel Cell	:	
Facility and Associated Equipment to be Located	:	
at 600 Iranistan Avenue, Bridgeport, Connecticut,	:	
and Associated Electrical Interconnection to The	:	
United Illuminating Company's Existing Congress	:	
Street Substation	:	September 29, 2020

NuPower Bridgeport FC, LLC
Motion for Party Status

Pursuant to Connecticut General Statutes (Conn. Gen. Stat.) §§ 4-177a and 16-50n and Section 16-50j-14 of the Regulations of Connecticut State Agencies (“R.C.S.A.”), NuPower Bridgeport FC, LLC (“NuPower” or the “Company”) hereby requests that the Connecticut Siting Council (“Council” or “CSC”) grant NuPower party status in the above-captioned proceeding. The Company represents that its legal rights, duties or privileges will be specifically affected by the Council’s decision in this matter. In support of this motion, NuPower states as follows:

1. On May 11, 2020 Doosan Fuel Cell America, Inc. (“Doosan”) filed a petition for a declaratory ruling as agent for and on behalf of NuPower with the Council. In the petition, Doosan requested that the Council approve the location and construction of twenty-one (21) natural gas fueled fuel cells and associated equipment to be located at 600 Iranistan Avenue in Bridgeport (the “Facility”). The fuel cells will provide 9.66 megawatts (“MW”) of power to The United Illuminating Company’s Congress Street

substation. The Facility will be installed by Doosan and will be owned and operated by NuPower.

2. As the owner of the proposed Facility, NuPower requests the right to participate as a party in this proceeding. NuPower does not intend to cross-examine witnesses. However, NuPower may provide pre-filed testimony and will be available to answer any questions about the Facility the Council may have during the course of the proceeding, including at a Council hearing if one is held. Additionally, NuPower may wish to file written comments or a brief on issues affecting its interests. As the owner of the Facility, NuPower will be specifically affected by the Council's decision on the Facility.

3. Conn. Gen. Stat. § 4-177a authorized 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, NuPower respectfully submits that its participation as a party in this proceeding satisfies the criteria in Conn. Gen. Stat. §§4-177a and 16-50n and R.C.S.A §16-50j-14.

4. A copy of all correspondence or communications should be sent to the following individuals:

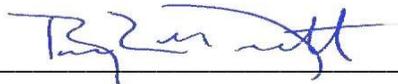
Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
Attn: Bruce L. McDermott
Phone: 203-772-7787
bmcdermott@murthalaw.com

NuPower Bridgeport FC, LLC
103 North Park Avenue
Easton, CT 06612
Attn: Dan Donovan
Phone: 203-395-4148
ddonovan@nupowerllc.net

5. Accordingly, for the foregoing reasons stated herein, NuPower requests that it be designated a party in this proceeding.

Respectfully submitted,

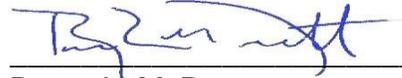
On behalf of NuPower Bridgeport FC, LLC

By: _____

Bruce L. McDermott
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CERTIFICATION

I hereby certify that a copy of the foregoing was sent to all participants of record as reflected on the Connecticut Siting Council's service list on this 29th day of September, 2020.



Bruce L. McDermott