



CRAMER & ANDERSON^{LLP}

Attorneys at Law

30 Main Street
Suite 204
Danbury, CT 06810
(203) 744-1234
Fax (203) 730-2500

14 Old Barn Road
Kent, CT 06757
46 West Street
Litchfield, CT 06759
51 Main Street
New Milford, CT 06776
38C Grove Street, 1st Floor
Ridgefield, CT 06877
6 Bee Brook Road
Washington Depot, CT 06794

June 27, 2023

VIA EMAIL ONLY
melanie.bachman@ct.gov

Melanie A. Bachman, Esq.
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06501

RE: Docket No. 516 and application submitted by The United Illuminating Company for a Certificate of Environmental Compatibility and Public Need for the Fairfield to Congress Railroad Transmission Line 115-kV Rebuild Project that consists of the relocation and rebuild of its existing 115- kilovolt (kV) electric transmission lines from the railroad catenary structures to new steel monopole structures and related modifications along approximately 7.3 miles of the Connecticut Department of Transportation's Metro-North Railroad corridor between Structure B648S located east of Sasco Creek in Fairfield and UI's Congress Street Substation in Bridgeport, and the rebuild of two existing 115-kV transmission lines along 0.23 mile of existing UI right-of-way to facilitate interconnection of the rebuilt 115-kV electric transmission lines at UI's existing Ash Creek, Resco, Pequonnock and Congress Street Substations traversing the municipalities of Bridgeport and Fairfield.

Dear Attorney Bachman:

Notice of Appearance

This firm represents BJ's Wholesale Club, Inc. ("BWC") in connection with the above-referenced application ("Application") filed by The United Illuminating Company

(the "Applicant") and pending before the Connecticut Siting Council (the "Council"). Please accept this letter as a Notice of Appearance by our firm on behalf of BWC in this proceeding and please direct future correspondence to the following counsel for BWC:

Daniel E. Casagrande
Cramer & Anderson LLP
30 Main Street, Suite 204
Danbury, CT 06810
(203) 744-1234
dcasagrande@crameranderson.com

Joseph P. Mortelliti
Cramer & Anderson LLP
30 Main Street, Suite 204
Danbury, CT 06810
(203) 744-1234
jmortelliti@crameranderson.com

If a more formal Appearance is required, please notify counsel for BWC.

Petition for Party and/or Intervenor Status

Pursuant to Conn. Gen. Stat. §§ 16-50n and 4-177a, as well as Conn. State Agency Regs §§ 16-50j-14, 15-50j-15a and 16-50j-17, BWC hereby requests that the Council grant BWC party and/or intervenor status in the Application, with full rights to participate in the proceeding as either a party or an intervenor.

BWC is the owner of certain real property located at 40 Black Rock Turnpike, Fairfield, Connecticut. The relocation and rebuilding of the transmission lines associated with the proposed Fairfield to Congress Railroad Transmission Line 115-kV Rebuild Project (the "Project"), as proposed, will result in transmission lines crossing directly above BWC's property. The relocation and rebuilding of the transmission lines will also result in certain poles being erected directly on BWC's property. These conditions will adversely impact BWC's daily operations at its property; such impacts include but are not limited to regular interference with BWC's loading dock and trucking operations.

Additionally, the Project as proposed involves the Applicant acquiring an estimated 19.25 acres of permanent easements, including 19.1 acres for the rebuilt 115-kV lines and 0.15 acre for permanent access to the lines. These proposed easements, if acquired, will impede BWC's redevelopment of its property that BWC anticipates commencing in the coming years.

Given these significant risks, BWC seeks to fully participate in the Council's proceedings regarding the Application to protect BWC's commercial, legal and real property interests in all aspects and potential impacts of the Project. BWC can only protect these various interests by participating as either a party or an intervenor to this proceeding. BWC's inclusion as a party or an intervenor is in the interests of justice and

will not interfere with the orderly conduct of the Council's proceedings. BWC participation will entail, but not be limited to, the offering of expert testimony, maps, drawings, plans and exhibits to demonstrate the reasons why the Project should be modified to safeguard BWC's commercial, legal and real property interests. BWC's relief sought includes but is not limited to an alternative relocation of the Applicant's transmission lines and poles to avoid deleterious, long-term effects to BWC's property.

If the Council requires additional information relative to this Notice of Appearance and Petition, please contact the undersigned.

Sincerely,

CRAMER & ANDERSON LLP

By:



Daniel E. Casagrande