

**CONNECTICUT SITING COUNCIL**

IN RE:

THE UNITED ILLUMINATING COMPANY (UI)	:	
APPLICATION FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND PUBLIC	:	DOCKET NO. 516
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 MILES 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, CONNECTICUT	:	OCTOBER 16, 2023

**TOWN OF FAIRFIELD’S MOTION TO AMEND CONNECTICUT SITING COUNCIL  
SCHEDULE**

The Intervenor, THE TOWN OF FAIRFIELD, (the “Intervenor” or the “Town”), hereby respectfully moves for the Connecticut Siting Council (“CSC”) to amend its current schedule for the above referenced matter (the “Application”) as follows:<sup>1</sup>

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<sup>1</sup> The Town also fully joins and supports the Motion to Amend filed by the Intervenor, SASCO CREEK NEIGHBORS ENVIRONMENTAL TRUST INCORPORATED, STEPHEN OZYCK, KARIM MAHFOUZ, WILLIAM DANYLKO, DAVID PARKER, 2190 POST ROAD, LLC, INVEST II and INTERNATIONAL

1. On or around November 10, 2023 for the final deadline for exchange of interrogatories between the Applicant and Intervenors.
2. On or around December 10, 2023 for the final deadline for pre-filed testimony, responses to interrogatories, and submission of late exhibits.
3. On or around the week of January 8, 2024 for the continued evidentiary session.

The Town respectfully submits that there is overwhelming good cause to amend the schedule as proposed above, which does not interfere with the CSC's statutory deadline for rendering a decision in this matter but will afford all parties' ample time and due process.

It is clear from the record that the United Illuminating Company's ("UI") Application has generated significant public interest as it will undoubtedly affect numerous property owners and the Town of Fairfield's community at large. To this end, the Town and multiple properties owners have sought and obtained Intervenor status in this matter.

It is also equally clear from the record that UI's effort to notify effected property owners was woefully insufficient and/or procedurally deficient. In the last forty-five days there have been over twenty parties that have either obtained Intervenor status or have a pending petition for intervenor status in this matter. The sheer number of intervening parties at this stage of the proceeding is persuasive evidence that the notification process followed by UI failed and belies any argument that these parties have sat on their rights.

It is also clear that an extension of time for discovery and evidentiary sessions is needed as important information continues to trickle in. For example, the full extent of The Connecticut Department of Transportation's ("CTDOT") position on the Application was not received by the


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INVESTORS and proposed intervenors, SASCO NEIGHBORHOOD ENVIRONMENTAL TRUST INCORPORATED, STEPHEN OZYCK, KARIM MAHFOUZ, WILLIAM DANYLKO, DAVID PARKER, 2190 POST ROAD, LLC, INVEST II and INTERNATIONAL INVESTORS.

CSC and then made available to the public until October 6, 2023. This is significant, because at UI's October 6, 2023 Town Hall presentation, UI's panel of representatives either did not know or were unable to answer many of the public's questions regarding the Application, including why the Project could not be placed unground in the CTDOT's right of way. This issue goes to the heart of the Application and whether there are reasonable and feasible alternatives. All Intervenors would be given ample and sufficient time to fully and fairly participate in this proceeding, but unfortunately the current schedule and the clear lack of actual notice to the community at large has deprived the Intervenors of this right.

WHEREFORE, the Town respectfully move for an amendment of the CSC's schedule in accordance with the new proposed schedule of deadlines and an additional public hearing as it relates to this Application as set forth above.

Respectfully submitted,  
**INTERVENOR,**  
**THE TOWN OF FAIRFIELD**

By:   
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## **CERTIFICATE OF SERVICE**

This is to certify that on the above date a true copy of the foregoing has been sent via electronic mail and U.S. Mail, first-class, postage pre-paid, to the following parties of record:

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