

CONNECTICUT SITING COUNCIL

PETITION OF UNITED :
ILLUMINATING COMPANY : DOCKET NO. 516
CERTIFICATE OF ENVIRONMENTAL :
COMPATABILITY AND PUBLIC NEED :
FOR THE FAIRFIELD TO CONGRESS :
RAILROAD TRANSMISSION LINE :
115-KV REBUILD PROJECT :
THAT EXTENDS :
FROM FAIRFIELD TO BRIDGEPORT, :
CONNECTICUT : SEPTEMBER 14, 2023

MOTION FOR CONTINUANCE

The Intervenor, THE TOWN OF FAIRFIELD, (the “Intervenor” or the “Town”), hereby respectfully moves for a continuance in the above captioned matter (the “Application”) on grounds that the same is reasonably necessary in order for the Intervenor to have a meaningful opportunity to prepare for the same consistent with their due process rights. The motion for continuance is necessary and proper in this instance as the current scheduling and deadlines concerning this Application are not practical. Affected property owners have only recently become aware of the Application. If the United Illuminating Company (“UI”) truly provided appropriate public outreach, then affected members of the public would have been aware of the application far sooner.

In response to the reaction of Town residents and business owners concerning this Application, representatives of UI have been in communication with the First Selectwoman of the Town. UI agreed to participate in a public Town meeting to answer questions and concerns as it relates to the Application, but then refused to provide its consent to the Town’s request for this proposed continuance. UI’s participation in a public Town meeting about this application will not provide any genuine benefit to affected property owners who have reasonable concerns about the impacts of the Application on their properties if the current scheduling and deadlines are not

extended. By the time that meeting would take place, those affected property owners would be foreclosed from having an opportunity to genuinely participate in the Application process unless the current scheduling and deadlines are extended.

In support hereof, the Town hereby requests that the CSC grant this motion for continuance based upon the following:

1. The current schedule provides that:
 - a. The final deadline for exchange of interrogatories between the Applicant and Intervenor(s) (also the “Parties”) is September 19, 2023.
 - b. The final deadline for pre-filed testimony, responses to interrogatories and submission of late filed exhibits is October 3, 2023.
 - c. The continued evidentiary session has been scheduled for 2:00 p.m. on October 17, 2023.
2. The Town proffers the following amended scheduling and deadlines in support of this motion:
 - a. The final deadline for the exchange of interrogatories between the Parties be extended to October 20, 2023.
 - b. The final deadline for pre-filed testimony, responses to interrogatories and submission of late filed exhibits be extended to November 30, 2023.
 - c. The continued evidentiary hearing be scheduled for some date during the week of January 8, 2024.

Counsel for the Town is available to attend a remote status conference if the CSC has any questions or would like to discuss the circumstances of the requested extension.

WHEREFORE, the Town respectfully moves for this continuance in accordance with the new proposed schedule of deadlines as it relates to this Application.

Respectfully submitted,

**INTERVENOR,
THE TOWN OF FAIRFIELD**

BY: _____



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ITS ATTORNEYS

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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A handwritten signature in blue ink, appearing to read "Timothy M. Herbst", written in a cursive style.

Timothy M. Herbst, Esq.