

STATE OF CONNECTICUT, OFFICE OF CONSUMER COUNSEL  
 TEN FRANKLIN SQUARE, NEW BRITAIN, CT 06051-2644  
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**STATE OF CONNECTICUT**  
**CONNECTICUT SITING COUNCIL**

RE: THE CONNECTICUT LIGHT AND POWER	:	DOCKET NO. 370
COMPANY APPLICATION FOR CERTIFICATES	:	
OF ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE CONNECTICUT VALLEY	:	
ELECTRIC TRANSMISSION RELIABILITY	:	
PROJECTS WHICH CONSIST OF (1) THE	:	
CONNECTICUT PORTION OF THE GREATER	:	
SPRINGFIELD RELIABILITY PROJECT THAT	:	
TRAVERSES THE MUNICIPALITIES OF	:	
BLOOMFIELD, EAST GRANBY, AND SUFFIELD,	:	
OR POTENTIALLY INCLUDING AN ALTERNATE	:	
PORTION THAT TRAVERSES THE	:	
MUNICIPALITIES OF SUFFIELD AND ENFIELD,	:	
TERMINATING AT THE NORTH BLOOMFIELD	:	
SUBSTATION; AND (2) THE MANCHESTER	:	
SUBSTATION TO MEEKVILLE JUNCTION	:	
CIRCUIT SEPARATION PROJECT IN	:	
MANCHESTER, CONNECTICUT.	:	DECEMBER 22, 2008

**MOTION OF THE  
 OFFICE OF CONSUMER COUNSEL  
 FOR PARTY STATUS**

**I. INTRODUCTION**

Pursuant to §§ 4-177a(a) and 16-2a(a) of the Connecticut General Statutes (“CGS”), the Office of Consumer Counsel (“OCC”) hereby asks the Connecticut Siting Council (“Siting Council”) to designate OCC as party to the above-captioned proceeding.

In support of this Motion, OCC states:

1. CGS § 4-177a(a) provides that a person may be granted party status in administrative proceedings, such as those of the Siting Council, if the person timely files a written petition stating facts

that demonstrate that their legal rights, duties or privileges will be specifically affected by the agency's decision in the case.

2. This petition is timely, under CGS § 4-177a(a).
3. OCC is the statutorily designated representative of Connecticut utility consumers. Under CGS § 16-2a(a), OCC is authorized to appear and participate in any regulatory or judicial proceedings in which the interests of such consumers may be involved, or in which matters affecting utility services rendered or to be rendered in Connecticut may be involved. The present Siting Council docket is such a regulatory proceeding.
4. In this proceeding, The Connecticut Light and Power Company ("CL&P") is seeking approval for a Certificate of Environmental Compatibility and Public Need For The Connecticut Valley Electric Transmission Reliability Projects Which Consist Of (1) The Connecticut Portion Of The Greater Springfield Reliability Project That Traverses The Municipalities Of Bloomfield, East Granby, And Suffield, Or Potentially Including An Alternate Portion That Traverses The Municipalities Of Suffield And Enfield, Terminating At The North Bloomfield Substation; And (2) The Manchester Substation To Meekville Junction Circuit Separation Project In Manchester, Connecticut.
5. The Siting Council's decision in this proceeding will affect the interests of Connecticut electric consumers and electric utility services to be rendered in this State. Specifically, this project will affect the reliability of the electric supply available to Connecticut consumers and also the rates charged to Connecticut ratepayers. The Application states (Executive Summary, p. ES-1) that the project is needed to provide safe, reliable and economic transmission service in a geographic area that includes north-central Connecticut. It also states (Executive Summary, p. ES-31) that the initial "all-in" capital cost of the project will be approximately \$728 Million. These costs will be recovered in regulated rates, rates which will be imposed on Connecticut ratepayers at least in part.
6. CL&P is the applicant in this matter. OCC has a long history of advocating the interests of CL&P customers, before the Connecticut Department of Public Utility Control and otherwise.

OCC's application for party status in the present proceeding is consistent with that history.

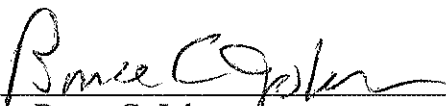
7. OCC, on behalf of the electric consumers it represents, has legal rights, duties and privileges that will be affected by the outcome of this proceeding. This consumer interest cannot be adequately represented by any other party.
8. OCC seeks full rights as a party in this proceeding, including the rights to conduct discovery, introduce and review evidence, cross-examine witnesses, submit briefs and present argument.
9. OCC's participation in this proceeding is in the public interest and good cause exists to grant this Motion. OCC's participation will not impair the interests of justice or impair the orderly conduct of the proceeding.
10. OCC's participation in this proceeding will not prejudice any other party or intervenor. For instance, OCC intends to execute any confidentiality agreements that may be necessary for its participation in this proceeding.
11. Communications concerning this proceeding should be served upon the following persons:

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Respectfully submitted,

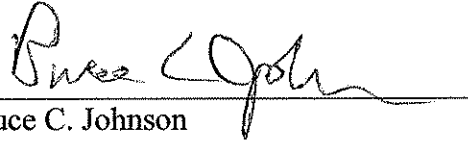
MARY J. HEALEY  
CONSUMER COUNSEL

By   
Bruce C. Johnson  
Principal Attorney

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## CERTIFICATION

I hereby certify that a copy of the foregoing has been mailed and/or hand-delivered to all known parties and intervenors of record this 22nd day of December 2008.



Bruce C. Johnson  
Commissioner of the Superior Court