

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

The Connecticut Light & Power Company) Docket No. 424
application for a Certificate of Environmental)
Compatibility and Public Need for the Connecticut)
portion of the Interstate Reliability Project)
that traverses the municipalities of Lebanon,)
Columbia, Coventry, Mansfield, Chaplin,)
Hampton, Brooklyn, Pomfret, Killingly, Putnam,)
Thompson and Windham, which consists of (a))
new overhead 345 - kV electric transmission lines)
and associated facilities extending between)
CL&P's Card Street Substation in the Town of)
Lebanon, Lake Road Switching Station in the)
Town of Killingly, and the Connecticut/Rhode)
Island border in the Town of Thompson; and (b))
related additions at CL&P's existing Card Street)
Substation, Lake Road Switching Station, and) MAY 11, 2012
Killingly Substation)

PETITION TO INTERVENE AS A PARTY UNDER §4-177a AND §16-50n and o

The Mount Hope Montessori School, Inc. hereby moves and petitions the Connecticut Siting Council to become a party in the above application by CL&P for a certificate of environmental compatibility and public need for upgrades to its electric transmission facilities in central and eastern Connecticut. The purpose of the intervention is to participate in these proceedings to protect substantial property rights which will be impacted by the subject of these proceedings.

Pursuant to Conn.Gen.Stat, §16-50n and o and §4-177a, Mount Hope Montessori School, Inc. ("Mt. Hope") is a Connecticut non-profit corporation located at 48 Bassets Bridge Road, Mansfield, Connecticut which has a direct interest in the proceedings which will be specifically and substantially affected as it owns land immediately adjacent to certain right of way use changes being considered in this docket, which changes are reasonably likely to have a substantial negative impact upon the Mt. Hope's school by

virtue of moving the facilities closer to and making them larger in size in relation to existing facilities. The increased proximity and looming nature of the proposed facilities will damage the views from the school, depress the property value of the school and make it less likely that students will enroll at the school due to actual and/or perceived increases in the Electromagnetic Field (EMF). Mt. Hope seeks to intervene as a party in the above proceedings for the purpose of propounding interrogatories, submitting testimony, briefs and other evidence relevant to the consideration of the application under consideration; specifically the mitigation of impacts to the school's existence and, as the impact is likely to destroy the viability of the school, to seek to seek the burial of the proposed lines pursuant to Conn.Gen.Stat, §16-50p(i), or, in such case as the counsel deems the burial to be technologically infeasible or placing an unreasonable economic burden on the ratepayers of the state the relocation of the school through a land exchange or other reasonable solution.

Mt. Hope's participation through counsel is narrowly focused and will therefore not impair the orderly conduct of the proceedings. The public good will be served by resolving through these proceedings the reasonable concerns of a party impacted by the proceedings.

Respectfully Submitted,

Mount Hope Montessori School, Inc.,

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The intervenor requests service be made by e-mail.

CERTIFICATE OF SERVICE

This is to certify that on this 11th day of May, 2012, one (1) copy of the foregoing was sent via electronic mail and an original and twenty (20) copies were sent via first class mail, postage pre-paid, to the Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051, and one copy was sent via electronic mail or mailed, postage prepaid, on this 11th day of may, 2012 to the following parties and intervenors of record:

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NRG Energy, Inc., NRG Power
Marketing, Inc., Connecticut Jet
Power LLC, Devon Power LLC,
Middletown Power LLC, Montville
Power LLC, Norwalk Power LLC,
and Meriden Gas Turbines, LLC
(Collectively NRG)

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EquiPower Resources Corp., Lake
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(Collectively, EquiPower)

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The United Illuminating Company
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