

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

RE: FEASIBILITY STUDY OF BACK-UP POWER : DOCKET NO. 432
REQUIREMENTS FOR TELECOMMUNICATIONS :
TOWERS AND ANTENNAS PURSUANT TO :
PUBLIC ACT 12-148. : OCTOBER 31, 2012

MOTION OF THE
OFFICE OF CONSUMER COUNSEL
FOR PARTICIPANT STATUS

Pursuant to § 16-2a(a) of the Connecticut General Statutes (“CGS”), the Office of Consumer Counsel (“OCC”) hereby respectfully requests that the Connecticut Siting Council (“Siting Council”) designate OCC as participant in the above-captioned proceeding. In support of this Motion, OCC states:

1. 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, as it may affect telecommunications consumers and/or electricity consumers from a cost and reliability perspective.
2. Public Act 12-148, An Act Enhancing Emergency Preparedness and Response, requires the Siting Council, in consultation and coordination with the Department of Emergency Services and Public Protection and the Public Utilities Regulatory Authority (PURA), to study the feasibility of requiring backup power for telecommunications towers and antennas as the reliability of such telecommunications service is considered to be in the public interest and necessary for the public health and safety.

3. OCC has a long history of advocating the interests of telecommunications customers, before the former Connecticut Department of Public Utility Control, PURA, and otherwise. OCC's application for participant status in the present proceeding is consistent with that history.
4. OCC's participation in this proceeding will not prejudice any other participant. For instance, OCC intends to execute any confidentiality agreements that may be necessary for its participation in this proceeding.
5. Although the deadline by which to request participant status in this docket was October 25, 2012, the OCC was not informed of this deadline and respectfully requests that the Siting Council allow the OCC to participate in this docket. 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.
6. Communications concerning this proceeding should be served upon the following persons:

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Respectfully submitted,

ELIN SWANSON KATZ
CONSUMER COUNSEL

By: _____
Lauren A. Henault
Staff Attorney II

I hereby certify that a copy
of the foregoing has been mailed,
electronically sent and/or
hand-delivered to all known
parties and intervenors of record this
31st day of October, 2012.

Lauren A. Henault
Commissioner of Superior Court