

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

RE: THE CONNECTICUT LIGHT AND POWER : DOCKET NO. 435
COMPANY APPLICATION FOR A CERTIFICATE :
OF ENVIRONMENTAL COMPATIBILITY and :
PUBLIC NEED FOR THE STAMFORD :
RELIABILITY CABLE PROJECT, WHICH :
CONSISTS OF CONSTRUCTION, MAINTENANCE, :
and OPERATION OF A NEW 115-kV :
UNDERGROUND TRANSMISSION CIRCUIT :
EXTENDING APPROXIMATELY 1.5 MILES :
BETWEEN GLENBROOK and SOUTH END :
SUBSTATIONS, STAMFORD, CONNECTICUT and :
RELATED SUBSTATION IMPROVEMENTS. : MARCH 4, 2013

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CONNECTICUT
SITING COUNCIL

**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 respectfully requests that the Connecticut Siting Council (“Siting Council”) designate OCC as party to the above-captioned proceeding. In support of this Motion, OCC states the following:

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 motion is timely, both under CGS § 4-177a(a) and the Siting Council’s Notice of Public Hearing, dated February 22, 2013.
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

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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 Stamford Reliability Cable Project, which consists of construction, maintenance, and operation of a new 115-kV underground transmission circuit extending approximately 1.5 miles between the Glenbrook and South End Substations in Stamford, Connecticut, and related substation improvements. Connecticut Siting Council Application for Stamford Reliability Cable Project, filed by CL&P on January 18, 2013 ("CL&P Application").
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 that the project is needed to "strengthen the 115-kV transmission system serving Stamford-Greenwich Sub-area and eliminate reliability criteria violations by relieving power flows and thus ensuring compliance with mandatory national and regional reliability standards. The Project would also provide the Stamford-Greenwich Sub-area with a strong electric supply source arising from the new transmission lines installed in Southwest Connecticut since 2006 by adding a new and alternate path to relieve power flows. Finally, the Project advances a long-range plan for expansion of Connecticut's electric power grid." CL&P Application, Executive Summary, p. ES-1. The Application also states that the estimated capital cost of the project will be approximately \$46.9 million. *See id.* at ES-7. CL&P will seek to recover costs in regulated rates, which, if approved, 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 for the interests of CL&P customers, before the Connecticut Public Utilities Regulatory Authority, formerly the 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.

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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:

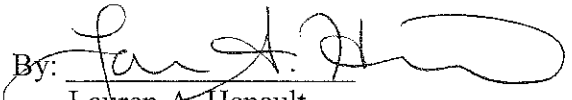
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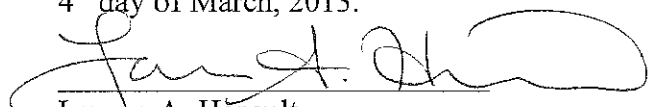
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Respectfully submitted,

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
4th day of March, 2013.


Lauren A. Henault
Commissioner of Superior Court