

STATE OF CONNECTICUT, OFFICE OF CONSUMER COUNSEL  
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STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

RE: THE UNITED ILLUMINATING COMPANY : DOCKET NO. 465  
APPLICATION FOR A CERTIFICATE OF :  
ENVIRONMENTAL COMPATIBILITY AND :  
PUBLIC NEED FOR THE CONSTRUCTION, :  
MAINTENANCE, AND OPERATION OF A 115/13.8 :  
KILOVOLT (kV) REPLACEMENT SUBSTATION :  
FACILITY LOCATED ON AN APPROXIMATELY :  
1.5 ACRE PORTION OF TWO ADJOINING UI- :  
OWNED PARCELS DIRECTLY ADJACENT TO :  
UI'S EXISTING BAIRD SUBSTATION, 1770 :  
STRATFORD AVENUE, STRATFORD, :  
CONNECTICUT, AND RELATED TRANSMISSION :  
STRUCTURE AND INTERCONNECTION :  
IMPROVEMENTS. : JANUARY 22, 2016

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

Pursuant to Connecticut General Statutes ("General Statutes") §§ 4-177a(a) and 16-2a(a), the Office of Consumer Counsel ("OCC") hereby respectfully requests that the Connecticut Siting Council ("Siting Council") designate OCC as a party to the above-captioned proceeding. In support of this Motion, OCC states the following:

1. General Statutes § 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 the petitioner's legal rights, duties, or privileges will be specifically affected by the agency's decision in the case.
2. This motion is timely under General Statutes § 4-177a(a) given that the Siting Council has not yet scheduled a hearing date.
3. OCC is the statutorily designated representative of Connecticut utility consumers. Pursuant to General Statutes § 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, on December 21, 2015, the United Illuminating Company ("UI") filed an Application with the Siting Council for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115/13.8-kilovolt (kV) replacement substation facility located on an approximately 1.5 acre portion of two adjoining UI-owned parcels directly adjacent to UI's existing Baird Substation, 1770 Stratford Avenue, Stratford, Connecticut, and related transmission structure and interconnection improvements ("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 "after careful review, [UI] has determined that it must address various issues at [the Baird Substation]. Although UI could temporarily resolve some of the issues through the replacement and expansion of existing facilities, the construction of an entirely new substation is the best option based upon constructability, reliability and cost considerations." Application, Executive Summary, at 1. The Application states that the estimated cost for the siting, design and construction of the new Baird substation and supporting infrastructure is approximately \$35 million. *See id.* at 36. UI will seek to recover costs in regulated rates, which, if approved, will be imposed on Connecticut ratepayers, at least in part.
6. UI is the applicant in this matter. OCC has a long history of advocating for the interests of UI 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.
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.

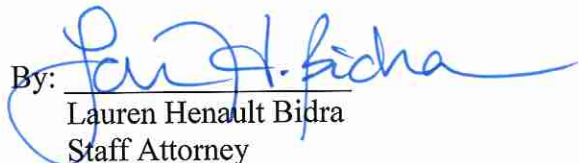
9. OCC's participation in this proceeding is in the public interest and good cause exists to grant this Motion. OCC's participation will not impair the interests of justice or impair the orderly conduct of the proceeding.
10. OCC's participation in this proceeding will not prejudice any other party or 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 at OCC:

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Office of Consumer Counsel  
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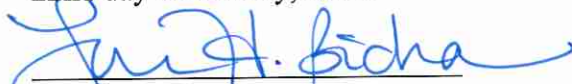
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Respectfully submitted,

ELIN SWANSON KATZ  
CONSUMER COUNSEL

By:   
Lauren Henault Bidra  
Staff Attorney

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  
22nd day of January, 2016.

  
Lauren Henault Bidra  
Commissioner of the Superior Court