

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051 Phone: (860) 827-2935 Fax: (860) 827-2950 E-Mail: siting.council@ct.gov Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

September 24, 2020

Marianne Barbino Dubuque, Esq. Carmody Torrance Sandak & Hennessey LLP P.O. Box 1110 Waterbury, CT 06721-1110 mdubuque@carmodylaw.com

RE: DOCKET NO. 490 – The United Illuminating Company application for a Certificate of Environmental Compatibility and Public Need for the Old Town Substation Rebuild Project that entails construction, maintenance and operation of a 115/13.8- kilovolt (kV) air-insulated replacement substation facility located on the existing Old Town Substation parcel at 282 Kaechele Place and two parcels immediately north totaling approximately 3 acres that are owned by the United Illuminating Company at 312 and 330 Kaechele Place, Bridgeport, Connecticut, and related transmission structure and interconnection improvements.

Dear Attorney Dubuque:

The Connecticut Siting Council (Council) is in receipt of your letter of September 22, 2020, requesting Party status for the Connecticut Light and Power Company d/b/a Eversource Energy in Docket No. 490.

Your request will be placed on the next meeting agenda, a copy of which will be sent to you. You will be notified of the Council's determination immediately thereafter.

Copies of the application are available at the Bridgeport City Hall and the Trumbull Town Hall. All documents filed to date are available at the Council's office or on our website under pending matters.

Please contact me if you have any questions.

Sincerely,

s/Melanie A. Bachman

Melanie A. Bachman Executive Director

MAB/MP/laf

c: Kathleen M. Shanley, Manager – Transmission Siting, Eversource Energy Service Company Jeffery D. Cochran, Senior Counsel, Eversource Energy Service Company Service List, dated July 10, 2020



Marianne Barbino Dubuque Partner Direct:203-578-4218 Fax:203-575-2600 MDubuque@carmodylaw.com

50 Leavenworth Street P.O. Box 1110 Waterbury, CT 06702

September 22, 2020

VIA ELECTRONIC MAIL

Attorney Melanie Bachman Executive Director Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

Re: DOCKET NO. 490 - The United Illuminating Company application for a Certificate of Environmental Compatibility and Public Need for the Old Town Substation Rebuild Project that entails construction, maintenance and operation of a 115/13.8- kilovolt (kV) air-insulated replacement substation facility located on the existing Old Town Substation parcel at 282 Kaechele Place and two parcels immediately north totaling approximately 3 acres that are owned by The United Illuminating Company at 312 and 330 Kaechele Place, Bridgeport, Connecticut, and related transmission structure and interconnection improvements

Dear Attorney Bachman:

In connection with the above-referenced Docket No. 490, enclosed please find the Motion of The Connecticut Light and Power Company doing business as Eversource Energy for Party Status.

The original document will be mailed to the Council for its file.

Very truly yours,

Marianne Barbino Dubuque

MBD/mkw Enclosures

cc: Service List dated July 10, 2020 (copy attached)

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LIST OF PARTIES AND INTERVENORS $\frac{\text{SERVICE LIST}}{\text{SERVICE LIST}}$

| Status Granted | Document Service | Status Holder (name, address & phone number) | Representative (name, address & phone number) |
|----------------|---------------------|--|---|
| Applicant | ⊠ E-mail | The United Illuminating Company | Bruce McDermott, Esq. Murtha Cullina LLP One Century Tower 265 Church Street New Haven, CT 06510-1220 (203) 772-7787 bmcdermott@murthalaw.com Ronald Rossetti Manager – Electric Capital Projects The United Illuminating Company 100 Marsh Hill Road Orange, CT 06477 (203) 926-4517 Ron.rossetti@uinet.com Samantha Marone Outreach Manager The United Illuminating Company 100 Marsh Hill Road Orange, CT 06477 (203) 499-3824 Samantha.marone@uinet.com |
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CONNECTICUT SITING COUNCIL

DOCKET NO. 490 - The United Illuminating : DOCKET 490

Company application for a Certificate of :

Environmental Compatibility and Public Need for the Old Town Substation Rebuild Project that entails construction, maintenance and operation of a : 115/13.8- kilovolt (kV) air-insulated replacement substation facility located on the existing Old Town Substation parcel at 282 Kaechele Place and two parcels immediately north totaling approximately 3 acres that are owned by The United Illuminating :

Company at 312 and 330 Kaechele Place, Bridgeport, : Connecticut, and related transmission structure and :

interconnection improvements : SEPTEMBER 22, 2020

MOTION OF THE CONNECTICUT LIGHT AND POWER COMPANY DOING BUSINESS AS EVERSOURCE ENERGY FOR PARTY STATUS

Pursuant to §§ 4-177a and 16-50n of the Connecticut General Statutes ("Conn. Gen. Stat.") and § 16-50j-14 of the Regulations of Connecticut State Agencies ("R.C.S.A."), The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") hereby requests that the Connecticut Siting Council (the "Council") grant Eversource party status in this proceeding. In support of its motion, Eversource states as follows:

- 1. Eversource is a specially chartered Connecticut corporation, with offices at 56 Prospect Street, Hartford, Connecticut, and an electric distribution company as defined in § 16-1 of the Connecticut General Statutes.
- 2. Eversource operates and maintains electric transmission and distribution facilities throughout the State of Connecticut, providing distribution service to approximately 1.3 million customers.
- 3. In this proceeding, The United Illuminating Company ("UI") has applied to the Council for a Certificate of Environmental Compatibility and Public Need (the "Certificate") for the construction, maintenance and operation of a 115-kV/13.8-kV substation facility located at 282, 312 and 330 Kaechele Place, Bridgeport, Connecticut to replace its existing Old Town Substation located at 282 Kaechele Place, Bridgeport (the "Project").
- 4. UI's proposed substation would be served by and interconnected with two of Eversource's 115-kV transmission lines. Those transmission lines are located as follows: The 1710 Line extends between Eversource's Devon Station in Milford, CT and UI's Pequonnock and Old Town Substations in Bridgeport, CT. Eversource's 1222 Line extends between UI's Old

Town Substation, in Bridgeport, CT and its Hawthorne Substation in Fairfield, CT. In addition, a third Eversource 115-kV transmission line (the 1714 Line), which presently bypasses UI's existing Old Town Substation and connects UI's Trumbull Substation and Eversource's Weston Substation, will be re-routed to the new substation yard to accommodate a future connection to the Old Town Substation.

- 5. Eversource requests the right to participate as a party in this proceeding, including any modifications to the Project recommended by the Council and other participants in this proceeding. Eversource does not intend to cross-examine witnesses; however, Eversource plans to present pre-filed testimony regarding its proposed facilities and will be available to answer any questions about the new transmission line support structures, transmission line conductors. and associated items that Eversource will own. Also, Eversource may wish to file written comments or a brief on issues affecting its interests. If the Council grants the Certificate, UI's substation would be directly interconnected with Eversource's 1710 and 1222 transmission lines, and these transmission lines and interconnection facilities would supply electricity to the Old Town Substation. The 1714 Line would be re-routed through the substation yard as a provision for future connection to UI's substation. Eversource will be specifically affected by the Council's decision on the Project because the Project would include Eversource's (i) construction of four transmission line structures, installation of associated transmission line conductors, and communication and shield wires that Eversource would continue to own, operate and maintain (ii) removal of two existing Eversource transmission line structures, conductors and wires, and (iii) appropriate interconnection of the Old Town Substation into Eversource's transmission network.
- 6. Section 4-177a of Conn. Gen. Stat. authorizes the Council to grant party status in a contested case if a person submits a written petition stating, "facts that demonstrate that the petitioner's legal rights, duties or privileges shall be specifically affected by the agency's decision." For the reasons explained above, the Company respectfully submits that its participation as a party in this proceeding satisfies the criteria in §§ 4-177a and 16-50n of Conn. Gen. Stat. and § 16-50j-14 of R.C.S.A.
- 7. Correspondence and other communications in regard to this matter should be served upon the following persons:

Kathleen M. Shanley Manager - Transmission Siting Eversource Energy Service Company P.O. Box 270 Hartford, CT 06141-0270 Telephone (860) 728-4527

Electronic mail: kathleen.shanley@eversource.com

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Jeffery D. Cochran Senior Counsel Eversource Energy Service Company P.O. Box 270 Hartford, CT 06141-0270 Telephone (860) 665-3548 Fax (860) 665-5504

Electronic mail: jeffery.cochran@eversource.com

Marianne Barbino Dubuque Carmody Torrance Sandak & Hennessey LLP P.O. Box 1110

Waterbury, CT 06721-1110 Telephone: 203-578-4218

Electronic mail: mdubuque@carmodylaw.com

WHEREFORE, Eversource respectfully requests that it be granted the right to participate in this proceeding as a party.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY DOING BUSINESS AS EVERSOURCE ENERGY

Marianne Barbino Dubuque

Carmody Torrance Sandak & Hennessey LLP

P.O. Box 1110

Waterbury, CT 06721-1110 Telephone: 203-578-4218

Electronic mail: mdubuque@carmodylaw.com

Its Attorney

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CERTIFICATION

I hereby certify that on this 22nd day of September, 2020, that one (1) copy of the foregoing document was sent via electronic mail to all persons on the July 10, 2020 Service List for this proceeding.

/Jarianne Barbino Dubuque