CONNECTICUT SITING COUNCIL



Petition No. 980 SITING COLLNOW

BNE Energy, Inc. Petition for a

Declaratory Ruling That No Certificate

of Environmental Compatibility and

Public Need is Required for the

Construction, Maintenance, and

Operation of a 3.2 MW Wind

Renewable Generating facility located

at 178 New Haven Road, Prospect,

Connecticut.

January 10, 2011

MOTION FOR INTERVENOR STATUS BY THE CONNECTICUT LIGHT AND POWER COMPANY

Pursuant to § 4-176(d) of the Connecticut General Statutes, The Connecticut Light and Power Company ("CL&P") hereby moves for permission to intervene in this proceeding. In support of its motion, CL&P states as follows:

- 1. CL&P is a specially chartered Connecticut corporation, with offices at 107 Selden Street, Berlin, Connecticut, and an electric distribution company as defined in § 16-1 of the Connecticut General Statutes.
- 2. CL&P operates and maintains electric transmission and distribution facilities throughout the State of Connecticut, providing distribution service to approximately 1.2 million customers.
- 3. In this proceeding, BNE Energy, Inc. ("BNE") has petitioned the Connecticut Siting Council (the "Council") to approve by declaratory ruling the construction of a 3.2 megawatt wind renewable generating facility at 178 New Haven Road in Prospect, CT (the "Project").
- 4. Section 4-176(d) of the Connecticut General Statutes authorizes the Council to grant intervenor status in a declaratory ruling proceeding if it finds that the request for permission to intervene "states facts demonstrating that the petitioner's participation [as an intervenor] is in the interests of justice and will not impair the orderly conduct of the proceedings." For the reasons stated below, CL&P respectfully submits that its participation as an intervenor satisfies the criteria in § 4-176(d).
- 5. In its Petition BNE proposes, among other things, that upon completion of the Project, the facility will be interconnected to the CL&P electric distribution system, in

accordance with CL&P technical standards and the State of Connecticut, ISO-New England and Federal Energy Regulatory Commission requirements.

- 6. For this reason, it is necessary for CL&P to participate in this proceeding in order to monitor these proceedings, including any modifications to the Project recommended by the Council and other participants in this proceeding. CL&P's does not intend to present pre-filed testimony, submit evidence, or produce and cross-examine witnesses, therefore CL&P's participation will not impair the orderly and efficient conduct of this proceeding.
- 7. Correspondence and other communications in regard to this matter should be served upon the following persons:

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with a copy to:

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WHEREFORE, CL&P respectfully requests that it be granted leave to participate in this proceeding as an intervenor.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY

By:

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