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December 8, 2022

Melanie A. Bachman, Esq.
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition No. 1549 - Motion of the United Illuminating Company for Party Status

Dear Ms. Bachman:

The United Illuminating Company ("UI") hereby submits to the Connecticut Siting Council ("Council") a Motion for Party Status ("Motion") in Petition No. 1549. Petition No. 1549 was filed by The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") for the proposed 1714 Line Rebuild Project consisting of the replacement and reconductoring of three of Eversource's 115-kilovolt electric transmission lines and one structure along its 1637 line within existing Eversource electric transmission right-of-way between Eversource's Weston Substation and UI's Old Town Substation.

An original and fifteen (15) copies of UI's Motion will be mailed to the Council.

Should you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,



Bruce L. McDermott

Enclosures

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STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

The Connecticut Light and Power Company d/b/a Eversource Energy petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed 1714 Line Rebuild Project consisting of the replacement and reconductoring of approximately 9.4 miles of its existing Nos. 1714, 1720, and 1222 115-kilovolt (kV) electric transmission lines and one structure along its 1637 line within existing Eversource electric transmission right-of-way between Eversource’s Weston Substation, 85 Weston Street in Weston and the United Illuminating Company’s Old Town Substation, 122 Kaechele Place in Bridgeport, Connecticut traversing Weston, Fairfield, Easton and Bridgeport and related electric transmission line and substation improvements

Petition No. 1549
December 8, 2022

MOTION OF THE UNITED ILLUMINATING COMPANY FOR PARTY STATUS

The United Illuminating Company (“UI” or the “Company”) respectfully requests that the Connecticut Siting Council (“Council”) grant UI party status in the above-captioned proceeding. This request is made pursuant to Sections 4-177a and 16-50n of the Connecticut General Statutes (“CGS”) and Section 16-50j-14 of the Regulations of Connecticut State Agencies (“RCSA”).

UI, a wholly-owned subsidiary of AVANGRID, Inc., is engaged in the purchase, transmission, distribution and sale of electricity and related services to approximately 338,654 residential, commercial and industrial customers in the greater New Haven and Bridgeport areas of Connecticut. The Company operates and maintains various electric transmission and distribution facilities in the southern portion of Connecticut, two of which include Hawthorne Substation and Old Town Substation.

In accordance with CGS §§ 4-177a and 16-50n, and RCSA § 16-50j-14, the Council shall grant a person or entity status as a party in a proceeding, if that person or entity's legal rights, duties or privileges will be specifically affected by the Council's decision in that proceeding. Requests for party status shall be filed in writing prior to the Council making a ruling on a petition for a declaratory ruling.

The Connecticut Light and Power Company doing business as Eversource Energy ("Eversource") filed Petition No. 1549 on November 14, 2022. In the instant proceeding, Eversource requested a declaratory ruling from the Council that no Certificate of Environmental Compatibility and Public Need is required for the rebuild of approximately 9.4 miles of transmission line infrastructure extending from the Town of Weston to the City of Bridgeport. This 9.4-mile transmission line infrastructure consists of four 115-kilovolt ("kV") transmission lines (Lines 1714, 1720, 1222 and 1637) that share a common right of way from Eversource's Weston Substation, located at 85 Weston Road in Weston, Connecticut to UI's Old Town Substation, located at 122 Kaechele Place in Bridgeport, Connecticut, and traversing through UI's Hawthorne Substation, located at 180 Hawthorne Drive, Fairfield, Connecticut. Petition No. 1549, Petition Filing, November 14, 2022, Part I at 3. Three of the four lines interconnect to at least one of UI's substations,¹ thus, these transmission lines and interconnection facilities supply electricity to UI's substations.

As part of this project, Eversource intends to replace structure (e.g., lattice tower, pole structure, etc.), conductor and static wire for three of the 115-kV lines. *Id.* at 6. In some instances, as noted by Eversource, the installation of replacement structures and

¹ Lines 1222, 1714 and 1720 pass through UI's Hawthorne Substation. Petition No. 1549, Petition Filing, November 14, 2022, Part I at 4.

conductors will require that work be completed at or near UI's substations. "New conductor on the 1720 Line will be installed to UI's terminal structure inside UI's Hawthorne Substation....New conductor on the 1714 and 1222 lines will be installed to UI's terminal structure inside UI's Hawthorne Substation." *Id.* at 13-14. Therefore, based on the scope of Eversource's proposed project, the Council's decision on Petition No. 1549 will dictate if and how Eversource's proposed work at or near UI's substations will be completed, and thereby, impact the electricity supply to UI's substations. Consequently, the Company will be specifically affected by the Council's decision on the proposed project and pursuant to CGS §§ 4-177a and 16-50n and RCSA § 16-50j-14 shall be granted party status.

UI is requesting party status so that it may monitor the proceedings by receiving filings from the Council and any other parties and intervenors and to reserve the right to present direct testimony and to cross-examine other parties and intervenors, as well as to file written comments or a brief on issues affecting its interests. Lastly, it is the Company's belief that its participation in this proceeding might assist the Council in resolving the issues of the instant petition and will not impair the orderly conduct of the proceedings.

The Company respectfully requests that copies of all correspondence or communications associated with this petition be sent to the following individuals:

The United Illuminating Company
100 Marsh Hill Road
Orange, CT 06477
Attn: Renni Pavolini
Email: rpavolini@uinet.com

Murtha Cullina LLP
265 Church Street
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Attn: Bruce L. McDermott
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Accordingly, for the foregoing reasons, the Company requests that it be designated a party in this proceeding.

Respectfully submitted,

THE UNITED ILLUMINATING COMPANY



By: _____

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