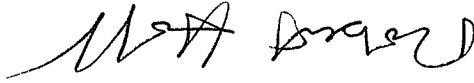


Robert Hoff



REID and RIEGE, P.C.

Very truly yours,

1. Linda D. Wilson's Request for Party Status
2. South Main Street Irrevocable Trust's Request for Party Status.
3. Linda D. Wilson's Motion to Extend Time for Pre-Filed Testimony
4. Appearance of Reid and Riege, P.C. on behalf of Linda D. Wilson and South Main Street Irrevocable Trust

I am providing the following documents for inclusion in the record of Docket No. 272, and hereby submit them to the Connecticut Siting Council. These documents have also been sent by first-class mail to all persons identified on the service list for this docket.

Dear Chairman Katz:

*Re: Docket No. 272 - The Connecticut Light and Power Company and the United Illuminating Company Application for a Certificate of Environmental Compatibility and Public Need for the Construction of a New 345-kV Electric Transmission Line and Associated Facilities between the Scovill Rock Switching Station in Middletown and the Norwalk Substation in Norwalk, Connecticut*

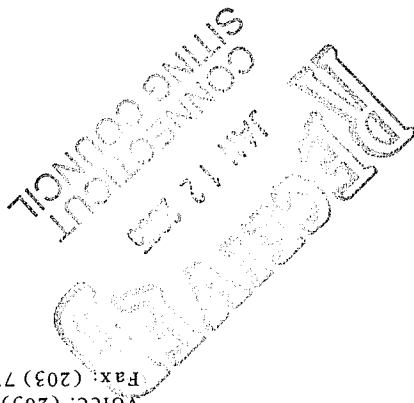
Ms. Pamela B. Katz, Chairman  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06054

January 11, 2005

Robert Hoff  
860-240-1019  
rhoff@reidandriege.com  
Please Reply to Hartford

234 CHURCH STREET  
9TH FLOOR  
NEW HAVEN, CT 06510-1819  
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Fax: (203) 777-6304

ONE FINANCIAL PLAZA  
HARTFORD, CT 06103  
Voice: (860) 278-1150  
Fax: (860) 240-1002



REID AND RIEGE, P.C.  
COUNSELLORS AT LAW



26, 2004. See Service List, Attached as Exhibit A.

(1) In this docket, Linda D. Wilson was granted intervenor status on August

In support of this request the Petitioner submits the following:

granting this request for party status.

docket, which took place after hearings commenced, provide good cause and justify

pursuant to RCSA § 16-50j-16 and Conn. Gen. Stat. § 16-50n. Changes in this

Docket No. 272 pursuant to the Council's authority to add parties at any time

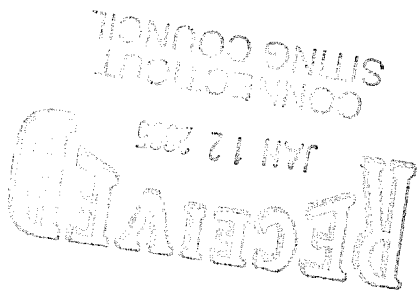
Connecticut Siting Council (the "Council") to grant her party status in relation to

Intervenor Linda D. Wilson (the "Petitioner") hereby requests the

LINDA D. WILSON'S  
REQUEST FOR PARTY STATUS

The Connecticut Light and Power  
Company and the United Illuminating  
Company Application for a Certificate  
of Environmental Compatibility and  
Public Need for the Construction of a  
New 345-kV Electric Transmission Line  
and Associated Facilities between the  
Scovill Rock Switching Station in  
Middletown and the Norwalk Substation  
in Norwalk, Connecticut

JANUARY 11, 2005 :



DOCKET NO. 272 :

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

- (2) The initial Application under consideration in Docket No. 272 did not include a proposal for nor a description of what has been dubbed the "Royal Oak Bypass," an alternative route through the towns of Middletown and Durham that would run across a substantial portion of the Petitioner's real property in those towns.
- (3) On December 30, 2004, Dominique S. Thornton, the Mayor of Middletown, submitted a letter to the Council expressing Middletown's *conditional* endorsement of the Royal Oak Bypass. See Thornton Letter of 12/30/04, Attached as Exhibit B.
- (4) Also on December 30, 2004, Maryann P. Boord, First Selectwoman of Durham, submitted a letter to the Council expressing the Town of Durham's endorsement of the Royal Oak Bypass. See Boord Letter of 12/30/04, Attached as Exhibit C.
- (5) On January 4, 2005, the Applicants requested that the Royal Oak Bypass be a topic of the hearings scheduled for January 18 & 20, 2005. Request from Applicants dated January 4, 2005, Attached as Exhibit D.
- (6) On January 5, 2005, Ms. Anne B. Bartosewicz of the Connecticut Light & Power Company submitted to the Council a set of responses to interrogatories, numbered Q-CSC-070, which describe in some detail a

Docket/Petition No. 272 Town/City Middletown/Norwalk

CONNECTICUT SITING COUNCIL  
PARTY STATUS REQUEST FORM

Ten Franklin Square, New Britain, CT 06051 • tel: 860.827.2935 fax: 860.827.2950  
siting.council@post.state.ct.us



(9) The Petitioner hereby submits her Party Status Request Form:  
and specifically and negatively impact the rights of the Petitioner.  
the proposal included in Applicants' Application threatens to substantially

(8) The recent activity promoting the Royal Oak Bypass as an alternative to  
070 of 1/5/05, at Response a.  
property owned by the Petitioner. See Bartosewicz Responses to Q-CSC-  
the proposed route, this "Royal-Oak Bypass," as passing through real

(7) In her responses, Ms. Bartosewicz identifies this discussed alternative to  
CSC-070 of 1/5/05, Attached as Exhibit E.  
referred to as the "Royal Oak Bypass." See Bartosewicz Responses to Q-  
discussed alternative to the proposal before the Council, specifically

Linda Wilson ("petitioner") owns a 50% interest in two parcels of real property located in the Towns of Middletown and Durham, Connecticut. The "Royal Oak Bypass," an alternate to the transmission line route proposed by the Applicants and to the alternatives evaluated in the Application, as described by Ms. Anne B. Bartosewicz of the Connecticut Light & Power Company in her January 5, 2005 responses to interrogatories, numbered Q-CSC-070, passes through and virtually bisects petitioner's real property. The Royal Oak Bypass aerial map submitted along with Ms. Bartosewicz's responses represents a route for the new 345 kV line that would run the length of the petitioner's residentially zoned real property. As owner of the real property, the Petitioner would be substantially and specifically affected by

2. Manner in which petitioner claims to be substantially and specifically affected:

1. Name: Linda D. Wilson  
 Address: 137 Main Street, Middletown, CT 06547  
 Phone Number: 860-347-3888  
 Fax Number: 860-346-0927  
 E-Mail Address: TArmstrong@ReidandRiege.com

The Application as submitted in this docket did not contemplate running the new 345 kV line through the "Royal Oak Bypass." Discussion of this Royal Oak Bypass as an alternative to the Applicants' proposal is unjustified and any decision by the Council to permit such a substitution of the proposed route would be ill-founded. Although Connecticut General Statutes § 16-501, as amended by P.A. 04-246, requires the Applicants to supply the Council with information indicating which areas along a proposed route are residential areas, the map submitted by Ms. Bartosewicz does not indicate that the petitioner's land, which represents a substantial portion of the Royal Oak Bypass, is residential. Petitioner's real property is residential, and the proposed 345 kV line, were it to run along the discussed "Royal Oak Bypass," would expose the Petitioner's entire Middletown and Durham parcel to adverse environmental effects. Additionally, placing the transmission lines and supporting structures where none exists now would significantly impact the value of this residential property. This Royal Oak Bypass

3. Contention of the petitioner:

any decision of the Council approving a new 345 kV electrical transmission line on and through her real estate.

The Council should grant this Request for Party Status based upon Connecticut General Statutes Section 16-50n and Regulations of Connecticut State Agencies Section 16-50j-16, which give the Council the authority to grant party

5. Statutory or other authority therefore

statutes and regulations governing the certification process. the Application to the Royal Oak Bypass is evaluated and abandoned based upon the the hearing process, and to ensure that this shift from the original route proposed in Petitioner seeks party status in order to fully participate in the remainder of

4. Relief sought by the petitioner:

would also result in more electromagnetic force (EMF) output than if the existing utility easement is used, as originally proposed by the Applicants. Accordingly, using the Royal Oak Bypass to cut a swath through petitioner's real property would leave a measurably negative net result, which cannot justify any endorsement of this alternative to the proposal. Use of the petitioner's land as part of the Royal Oak Bypass would result in a transmission line less technically, environmentally, and economically feasible than the route originally proposed in the Application.

<sup>1</sup> The Council has reserved the authority to waive the rule requiring that such a request be made prior to the hearings. See RCOSA § 16-50j-3.

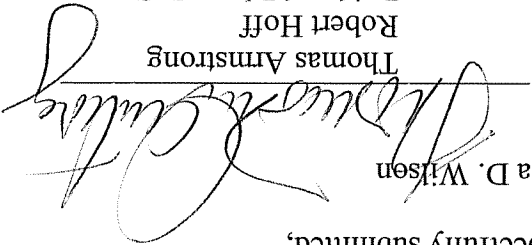
The Petitioner intends to submit evidence that EMF output would be higher were the Applicants to run a 345 kV transmission line through the Royal Oak Bypass than if they were to use the proposed route along the Middletown/Durham town line, which would employ the existing right of way.

6. Nature of evidence of evidence that the petitioner intends to present.

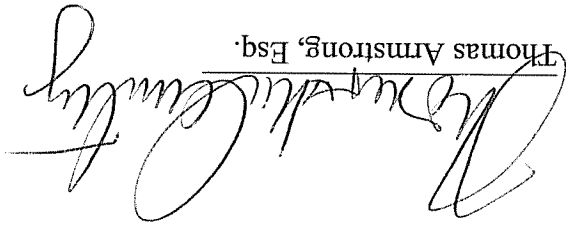
Middletown/Durham town line instead of the Royal Oak Bypass. Utilizing the Applicants' proposed route using the existing right of way along the 50p to establish that an analysis employing the statutory standards would dictate. Additionally, the Petitioner relies upon Conn. Gen. Stat. §§ 16-50i and 16-50j for party status should be granted.

status at any time during the proceeding.<sup>1</sup> The interests of the Petitioner as the owner of potentially affected real property combined with the fact that only recently did the Royal Oak Bypass (which was not included in the Application upon which notice on this docket was founded) become detailed by the Applicants' description of such route submitted on January 5, 2005 establish good cause upon which this request for party status should be granted.



Respectfully submitted,  
 Linda D. Wilson  
 By:   
 Thomas Armstrong  
 Robert Hoff  
 Reid and Riege, P.C.  
 One Financial Plaza  
 Hartford, CT 06103  
 Telephone: (860) 278-1150  
 Fax: (860) 240-1002  
 Juris. No. 049362  
 Her Counsel

The Petitioner intends to submit evidence as to the environmental and other impacts the 345 kV transmission line would have on her real property were the Royal Oak Bypass to be approved by the Council.  
 The Petitioner also intends to submit evidence of the residential character of her real property, across which the Royal Oak Bypass would run.  
 For the foregoing reasons, the Petitioner respectfully requests that the Council grant her Request for Party Status.

  
 Thomas Armstrong, Esq.

This is to certify that a true and correct copy of the foregoing was sent via first-class mail, postage prepaid, on this 1<sup>st</sup> day of January, 2005, to all parties and intervenors identified on the Service List.

CERTIFICATE OF SERVICE