

December 23, 2019

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

Re: PETITION NO. 1310A – Quinebaug Solar, LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 50 megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut

Dear Attorney Bachman:

In connection with the above-referenced Petition No. 1310A, enclosed please find an original plus fifteen (15) copies of the Motion of The Connecticut Light and Power Company Doing Business As Eversource Energy For Party Status.

Very truly yours,


Marianne Barbino Dubuque

MBD/mkw
Enclosures

cc: Service List dated November 14, 2019 attached (with enclosure)

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	<input checked="" type="checkbox"/> E-mail	Quinebaug Solar, LLC	<p>David W. Bogan, Esq. Locke Lord LLP 20 Church Street Hartford, CT 06103 Phone: (860) 541-7711 Fax: (866) 877-2145 david.bogan@lockelord.com</p> <p>Kathryn E. Boucher, Esq. Locke Lord LLP 20 Church Street, 20th Floor Hartford, CT 06103 Phone: (860) 541-7714 kathryn.boucher@lockelord.com</p> <p>Hagen Lee Quinebaug Solar, LLC c/o NextEra Energy Resources, LLC 700 Universe Boulevard, E5E/JB Juno Beach, FL 33408 Phone: (561) 694-4012 hagen.lee@nexteraenergy.com</p>
Party (Approved 9/19/17)	<input checked="" type="checkbox"/> E-mail	Troy and Meghan Sposato 192 Wauregan Road Canterbury, CT 06331 megsposato@yahoo.com	

CONNECTICUT SITING COUNCIL

PETITION NO. 1310A – Quinebaug Solar, LLC	:	PETITION NO. 1310A
petition for a declaratory ruling that no	:	
Certificate of Environmental Compatibility and	:	
Public Need is required for the proposed	:	
construction, maintenance and operation of a	:	
50 megawatt AC solar photovoltaic electric	:	
generating facility on approximately 561 acres	:	
comprised of 29 separate and abutting privately-	:	
owned parcels located generally north of	:	
Wauregan Road in Canterbury and south of	:	
Rukstela Road and Allen Hill Road in	:	
Brooklyn, Connecticut	:	December 23, 2019

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 (the “Company”) hereby requests that the Connecticut Siting Council (the “Council”) grant the Company party status in this proceeding. In support of its motion, the Company states as follows:

1. The Company 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 Conn. Gen. Stat.
2. The Company 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, Quinebaug Solar, LLC (“Quinebaug Solar”) has filed a petition with the Council for a declaratory ruling in connection with the proposed construction, maintenance and operation of a 50 megawatt AC solar photovoltaic electric generating facility to be located on parcels of land generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut (the “Project”).

4. As set forth in Quinebaug Solar's petition, the Project would be served by and interconnected with the Company's existing 1607 transmission line (115-kV) located in Canterbury. Further, if the Council approves the petition, Quinebaug Solar would (a) construct, own, operate and maintain underground collection lines (except that the Company would own such portions of these lines that cross a public right-of-way) and (b) design, construct, own and maintain a new collector substation up to the point of change of ownership on a structure located within the new Quinebaug Substation. The Company would design, construct, own and maintain a new 115-kV switching station in Canterbury, to be designated as the Canterbury Switching Station (the "Switching Station"), and two (2) new 115-kV transmission line tap sections and associated line support structures (located adjacent to the Switching Station), to create a line loop in and out of the Switching Station. In addition, as part of the interconnection work required to connect the Project to the existing transmission system, the Company would need to upgrade its transmission system by separating its existing 1000 and 1080 transmission lines (115-kV), which are currently supported on the same structures, replacing five (5) laminated wood double-circuit structures, with ten (10) new weathering steel single-circuit monopoles, within an approximately 0.75 mile section of existing right-of-way between Bean Hill and Wawecus Junction in Norwich, Connecticut. Finally, the Company would own the portions of the collection lines that cross a public right-of-way and lease such line portions back to Quinebaug Solar for the Project.

5. The Company requests the right to participate as a party in this proceeding, including the right to participate in the Council's hearings, introduce evidence (including more detailed information concerning the Company's planned facilities), present and cross-examine witnesses and submit written briefs or comments.

6. If the Council approves the petition, the Company's rights and interests would be substantially affected by the Council's decision in this proceeding because the Project approval would require that the Company (i) construct the Switching Station and construct and install transmission facilities and equipment within the Switching Station and two (2) 115-kV transmission line tap sections and associated line support structures to create the line loop in and out of the Switching Station and (ii) integrate the Switching Station into the Company's transmission network. The Company would also conduct the line separation in Norwich as described in Paragraph 4 above and own the portions of the collection lines that cross a public right-of-way. Accordingly, the Company has substantial rights and interests that are at issue in this proceeding.

Furthermore, consideration by the Council of the Company's planned facilities necessitated by the Project would promote efficiency and economy of the Council's resources as part of the Record in this proceeding, in lieu of an additional filing by the Company after a decision is rendered, if the Project were to be approved.

7. 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.

8. Correspondence and other communications in regard to this matter should be served upon the following persons:

Kathleen M. Shanley
Manager – Transmission Siting
Eversource Energy
P.O. Box 270
Hartford, CT 06141-0270
Telephone: 860-728-4527
Electronic mail: kathleen.shanley@eversource.com

Jeffery D. Cochran
Senior Counsel
Eversource Energy
P.O. Box 270
Hartford, CT 06141-0270
Telephone: 860-665-3548
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, the Company 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

By: 
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

cc: Service List dated November 14, 2019