



20 Church Street  
20th Floor  
Hartford, CT 06103  
Telephone: 860-525-5065  
Fax: 860-527-4198  
www.lockelord.com

Kathryn E. Boucher  
Direct Telephone: 860-541-7714  
Direct Fax: 860-955-1145  
kathryn.boucher@lockelord.com

July 24, 2019

***Via Electronic Mail and First Class Mail***

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

RE: ***Petition No. 1376*** – The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed electrical interconnection between its existing Scitico Substation located at 20 Bailey Road, Enfield, Connecticut and Nutmeg Solar, LLC's 19.6 megawatt solar photovoltaic electric generating facility located generally south of Bailey Road and east of Route 191 (Broad Brook Road) in Enfield, Connecticut consisting of modifications to the Scitico Substation, relocation of the existing No. 1976 electric transmission line that terminates at Scitico Substation, the construction, operation and maintenance of a new approximately 330-foot 115-kilovolt (kV) underground transmission line, and related substation and electric transmission line structure improvements.

Dear Ms. Bachman:

On behalf of Nutmeg Solar, LLC ("Nutmeg Solar"), enclosed please find an original and 15 copies of Nutmeg Solar's Motion for Party Status in connection with the above-referenced proceeding.

Please feel free to contact me or David Bogan of this office (860-541-7711) if you have any questions or require additional information.

Very truly yours,

A handwritten signature in black ink that reads "Kate Boucher". The signature is written in a cursive, flowing style.

Kathryn E. Boucher

cc: Service List

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed electrical interconnection between its existing Scitico Substation located at 20 Bailey Road, Enfield, Connecticut and Nutmeg Solar, LLC's 19.6 megawatt solar photovoltaic electric generating facility located generally south of Bailey Road and east of Route 191 (Broad Brook Road) in Enfield, Connecticut consisting of modifications to the Scitico Substation, relocation of the existing No. 1976 electric transmission line that terminates at Scitico Substation, the construction, operation and maintenance of a new approximately 330-foot 115-kilovolt (kV) underground transmission line, and related substation and electric transmission line structure improvements

Petition No. 1376

July 24, 2019

**MOTION OF NUTMEG SOLAR, LLC FOR PARTY STATUS**

Pursuant to Connecticut General Statutes ("Conn. Gen. Stat.") §§ 4-176, 4-177a and 16-50k, and Regulations of Connecticut State Agencies § 16-50j-14, Nutmeg Solar, LLC ("Nutmeg Solar") hereby moves the Connecticut Siting Council (the "Council") for designation as a party in the above-captioned proceeding. In support of its petition, Nutmeg Solar states as follows:

1. Nutmeg Solar is an indirect, wholly-owned subsidiary of NextEra Energy Resources, LLC ("NEER"), which in turn is an indirect, wholly-owned subsidiary of NextEra Energy, Inc. ("NextEra"), headquartered at 700 Universe Boulevard, Juno Beach, Florida 33408.

2. This proceeding relates to Petition 1352, in which the Council issued a declaratory ruling to Nutmeg Solar approving the proposed construction, maintenance and operation of a 19.6-megawatt AC solar photovoltaic electric generating facility (the "Nutmeg Solar Project") on approximately 162 acres, comprised of 9 separate parcels, located generally south of Bailey Road and east of Route 191 (Broad

Brook Road), and associated electrical interconnection to The Connecticut Light and Power Company d/b/a Eversource Energy's ("Eversource's") Scitico Substation ("Scitico") at 20 Bailey Road in Enfield, Connecticut.

3. Eversource has filed Petition 1376 (the "Petition") with the Council seeking a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required pursuant to Conn. Gen. Stat. § 16-50g *et seq.* for the modifications to Scitico, the existing 1976 transmission line that terminates at Scitico, and for installation of a 330-foot new 115-kV underground transmission line on Eversource and private property in Enfield (the "Project"). The purpose of the Project is to provide an electrical interconnection between Scitico and the Nutmeg Solar Project's Collector Substation. The privately-held property is subject to a purchase option held by Nutmeg Solar. The Nutmeg Solar Project cannot operate without Council review and approval of the Project facilities. Accordingly, Nutmeg Solar has substantial rights, duties and privileges at issue in this proceeding that will be specifically affected by the Council's decision in this proceeding pursuant to Conn. Gen. Stat. § 4-177a.

4. Nutmeg Solar proposes to participate in this proceeding, including but not limited to participation in discovery, participation in any hearings held by the Council, cross-examination of any witnesses, and submission of briefs. The participation of Nutmeg Solar will not impair the orderly conduct of this proceeding, and will enhance the Council's consideration of the issues raised in the Petition.

5. Please include the following individuals on the service list for this proceeding as authorized representatives of Nutmeg Solar:

Hagen Lee  
Director – Development  
NextEra Energy Resources, LLC  
700 Universe Boulevard  
Juno Beach, FL 33408  
(561) 694-4012  
[hagen.lee@nexteraenergy.com](mailto:hagen.lee@nexteraenergy.com)

David W. Bogan, Esq.  
Kathryn E. Boucher, Esq.  
Locke Lord LLP  
20 Church Street  
Hartford, CT 06103  
(860) 541-7711  
(860) 541-7711  
[david.bogan@lockelord.com](mailto:david.bogan@lockelord.com)  
[kathryn.boucher@lockelord.com](mailto:kathryn.boucher@lockelord.com)

WHEREFORE, for the foregoing reasons, Nutmeg Solar respectfully requests that the Council grant its Motion to for Party Status in this proceeding.

Respectfully submitted,

NUTMEG SOLAR, LLC

A handwritten signature in black ink, appearing to read 'D. Bogan', written over a horizontal line.

By: \_\_\_\_\_

David W. Bogan, Esq.

Kathryn E. Boucher, Esq.

Locke Lord LLP

20 Church Street

Hartford, CT 06103

(860) 541-7711

(860) 541-7714

[david.bogan@lockelord.com](mailto:david.bogan@lockelord.com)

[kathryn.boucher@lockelord.com](mailto:kathryn.boucher@lockelord.com)

*Its Attorneys*

**CERTIFICATION**

This is to certify that on this 24th day of July, 2019, an original and fifteen (15) copies of the foregoing were sent by express mail to The Connecticut Siting Council, 10 Franklin Square, New Britain, Connecticut 06051, one copy was served on all other known parties and intervenors electronically and by depositing the same in the United States mail, first class postage prepaid on this 25th day of February, 2019 and an electronic copy was provided to the Connecticut Siting Council.

A handwritten signature in black ink, appearing to read 'D. Bogan', with a long horizontal flourish extending to the right.

---

David W. Bogan, Esq.