

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

**PETITION OF THE UNITED
ILLUMINATING COMPANY FOR A
DECLARATORY RULING THAT NO
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED IS
REQUIRED FOR THE CONSTRUCTION,
OPERATION, AND MAINTENANCE OF A
2.2 MW AC SOLAR PHOTOVOLTAIC
FACILITY AND A 2.8 MW AC FUEL CELL
FACILITY ON SEASIDE LANDFILL
LOCATED AT 350 WALDERMERE
AVENUE, BRIDGEPORT, CONNECTICUT**

PETITION NO. 1104

SEPTEMBER 4, 2014

PRE-HEARING SUBMISSION OF THE CITY OF BRIDGEPORT

The City of Bridgeport (“City”) hereby submits its response to the Hearing Procedure memorandum issued by the Connecticut Siting Council (the “Council”) in preparation for the September 11, 2014 hearing before the Council on United Illuminating’s petition requesting a declaratory ruling that a certificate of environmental compatibility and public need is not required for the construction, operation, and maintenance of both a 2.2 MW AC solar photovoltaic facility and 2.8 MW AC fuel cell facility on Seaside Landfill in Bridgeport, Connecticut (the “Project”).

I. Witnesses

The City currently expects that Mayor Bill Finch will present an opening statement at the hearing. Other than Mayor Finch’s opening statement, the City does not anticipate affirmatively calling witnesses to testify on the City’s behalf. Should the Council have questions for the City, however, the City will have the following individuals available for the hearing:

John Cottell, Deputy Director, Public Facilities;

Charles Carroll, Director of Parks & Recreation;

David Kooris, Director of Planning Economic Development; and

Michael Manolakas, Environmental Engineer, Leggette, Brashears & Graham

II. Pre-Filed Testimony

The City does not propose to file integrated direct testimony that will be sponsored and adopted under oath by witnesses.

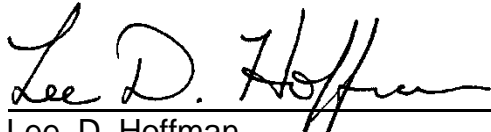
III. Documents to be Administrative Noticed

At this time, the City does not ask that the Council take administrative notice of any documents other than those contained in the Council's Administrative Notice List.

IV. Exhibits

The City does not presently have copies of exhibits which it will offer at the hearing. However, the City anticipates that it will offer the opening statement of Mayor Finch into evidence at the hearing.

RESPECTFULLY SUBMITTED,
THE CITY OF BRIDGEPORT

By: _____

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