

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Petition of The United Illuminating Company for a)	Petition No. 1104
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 Waldemere Avenue,)	September 4, 2014
Bridgeport, Connecticut)	

PRE-HEARING SUBMISSION OF THE UNITED ILLUMINATING COMPANY

The United Illuminating Company ("UI") 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 UI'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 a 2.8 MW AC fuel cell facility on Seaside Landfill in Bridgeport, Connecticut (the "Project"):

I. Witnesses

UI currently expects the following individuals to be witnesses at the hearing:

1. Mr. Anthony Marone, Senior Vice President, Customer and Business Services, UI, 180 Marsh Hill Road, Orange, CT. Mr. Marone will provide information on the Project and its design and other technical information.
2. Mr. Thomas Judge, Senior Project Manager, UI, 180 Marsh Hill Road, Orange, CT. Mr. Judge will provide information on the Project and its design and other technical information.
3. Mr. Michael Libertine, Director of Siting & Permitting, All-Points Technology Corporation, P.C., 3 Saddlebrook Drive, Killingworth, CT 06419. Mr. Libertine will provide technical information concerning the Project's visual impacts.
4. Mr. Joseph Perugini, P.E., Weston & Sampson, 273 Dividend Road Rocky Hill, CT. Mr. Perugini will provide technical information concerning environmental, natural diversity and historic preservation issues and other topics.

5. Mr. Duane Himes, Weston & Sampson, 273 Dividend Road Rocky Hill, CT. Mr. Himes will provide technical information concerning the environmental, natural diversity and historic preservation issues and other topics.

6. Other witnesses may be called, as necessary, to respond to interrogatories or Council questions at the hearings, or to address matters raised by parties or intervenors.

II. Pre-Filed Testimony

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

III. Documents to be Administratively Noticed

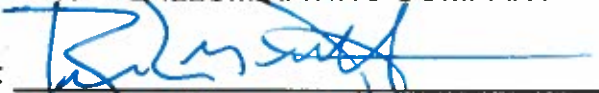
At this time, UI does not ask that the Council take administrative notice of any documents other than those contained in the Council's Administrative Notice List.

IV. Exhibits

UI does not presently have copies of exhibits which it will offer at the hearing. However, the following exhibits are anticipated to be offered into evidence at the hearing:

1. Petition;
2. Interrogatory responses to Siting Council pre-hearing interrogatories.

RESPECTFULLY SUBMITTED,
THE UNITED ILLUMINATING COMPANY

By: 

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