

CONNECTICUT SITING COUNCIL

DOCKET NO. 426 – Third Taxing	:	DOCKET 426
District Electric Department	:	
application for a Certificate of	:	
Environmental Compatibility and	:	
Public Need for the construction,	:	
maintenance, and operation of a	:	
proposed 115-kV transmission	:	
connection and expansion of the East	:	
Avenue Substation located at 6 Fitch	:	
Street, Norwalk, Connecticut	:	May 10, 2012

**MOTION OF
THE CONNECTICUT LIGHT AND POWER COMPANY 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 (“CL&P”) hereby requests that the Connecticut Siting Council (the “Council”) grant CL&P party status in this proceeding. In support of its motion, CL&P states as follows:

1. CL&P is a specially chartered Connecticut corporation, with offices at 107 Selden Street, Berlin, Connecticut, and an electric distribution company as defined in § 16-1 of the Connecticut General Statutes.

2. CL&P 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, the Third Taxing District Electric Department of the City of Norwalk (“TDD”) has applied to the Council for a Certificate of Environmental Compatibility and Public Need (the “Certificate”) for a new 115-kV/27.6-kV substation to be located on Fitch Street adjacent to TDD’s existing East Avenue Substation in Norwalk, CT (the “Project”).

4. As explained in TDD’s application, TDD’s proposed new substation would be served by and interconnected with CL&P’s 1416 transmission line (115-kV), which extends between CL&P’s Compo Substation in Westport, CT and Darien Substation in Darien, CT. Also, CL&P, as the owner of the 1416 transmission line, would construct two transmission line take-off structures on its transmission line right of way and install the transmission line

conductors from these two take-off structures to the line terminals within TDD's new substation to interconnect the 1416 transmission line with TDD's new substation (TDD Application at 6).

5. CL&P requests the right to participate as a party in this proceeding, including the right to participate in the Council's hearings, introduce evidence, present and cross-examine witnesses and submit written briefs or comments. If the Council grants the Certificate, TDD's new substation would be directly interconnected with CL&P's 1416 transmission line via new CL&P transmission interconnection facilities that would supply electricity to TDD's substation. Thus, CL&P's rights and interests would be substantially affected by the Council's decision in this proceeding because issuance of the Certificate would permit TDD to construct its proposed new substation and CL&P to construct new transmission facilities to interconnect the substation with CL&P's transmission line and network in southwestern Connecticut. CL&P is affected because (i) the proposed project would include construction of CL&P's interconnection facilities and (ii) the operation of the new substation would need to be appropriately integrated into CL&P's transmission network. Accordingly, CL&P has substantial rights and interests at issue in this proceeding.

6. 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, CL&P respectfully submits that its participation as 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.

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

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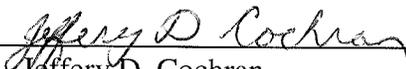
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WHEREFORE, CL&P respectfully requests that it be granted the right to participate in this proceeding as a party.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY

By:  _____
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cc: Service List

CERTIFICATION

I hereby certify that on this tenth day of May, 2012 one (1) copy of the foregoing document was sent via electronic mail or mailed to all persons on the Service List for this proceeding.

Jeffery D Cochran

Jeffery D. Cochran