

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

RE: THE CONNECTICUT LIGHT AND POWER : DOCKET NO. 424
COMPANY APPLICATION FOR A CERTIFICATE :
OF ENVIRONMENTAL COMPATIBILITY AND :
PUBLIC NEED FOR THE CONNECTICUT :
PORTION OF THE INTERSTATE RELIABILITY :
PROJECT THAT TRAVERSES THE :
MUNICIPALITIES OF LEBANON, COLUMBIA, :
COVENTRY, MANSFIELD, CHAPLIN, HAMPTON, :
BROOKLYN, POMFRET, KILLINGLY, PUTNAM, :
THOMPSON, and WINDHAM, WHICH CONSISTS OF :
(a) NEW OVERHEAD 345-kV ELECTRIC :
TRANSMISSION LINES AND ASSOCIATED :
FACILITIES EXTENDING BETWEEN CL&P's :
CARD STREET SUBSTATION IN THE TOWN OF :
LEBANON, LAKE ROAD SWITCHING STATION IN :
THE TOWN OF KILLINGLY, AND THE :
CONNECTICUT/RHODE ISLAND BORDER IN THE :
TOWN OF THOMPSON; AND (b) RELATED :
ADDITIONS AT CL&P's EXISTING CARD STREET :
SUBSTATION, LAKE ROAD SWITCHING :
STATION, AND KILLINGLY SUBSTATION. : APRIL 17, 2012

**MOTION OF THE
OFFICE OF CONSUMER COUNSEL
FOR PARTY STATUS**

I. INTRODUCTION

Pursuant to §§ 4-177a(a) and 16-2a(a) of the Connecticut General Statutes (“CGS”), the Office of Consumer Counsel (“OCC”) hereby asks the Connecticut Siting Council (“Siting Council”) to designate OCC as party to the above-captioned proceeding.

In support of this Motion, OCC states:

1. CGS § 4-177a(a) provides that a person may be granted party status in administrative proceedings, such as those of the Siting Council, if the person timely files a written petition stating facts that demonstrate that their legal rights, duties or privileges will be specifically affected by the agency’s decision in the case.

STATE OF CONNECTICUT, OFFICE OF CONSUMER COUNSEL
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2. This petition is timely, under CGS § 4-177a(a).
3. OCC is the statutorily designated representative of Connecticut utility consumers. Under CGS § 16-2a(a), OCC is authorized to appear and participate in any regulatory or judicial proceedings in which the interests of such consumers may be involved, or in which matters affecting utility services rendered or to be rendered in Connecticut may be involved. The present Siting Council docket is such a regulatory proceeding.
4. In this proceeding, The Connecticut Light and Power Company (“CL&P”) is seeking approval for a Certificate of Environmental Compatibility and Public Need for the Connecticut portion of its Interstate Reliability Project, by which it proposes to construct and operate new 345-kV electric transmission lines and make related modifications and improvements to existing 345-kV and 115-kV transmission lines and related facilities in Northeast Connecticut, Northwestern Rhode Island, and South-central Massachusetts. (Connecticut Siting Council Application for The Connecticut Portion of the Interstate Reliability Project, filed by CL&P on December 23, 2011 (“CL&P Application”), Volume 1, Executive Summary, page ES-1.)
5. The Siting Council’s decision in this proceeding will affect the interests of Connecticut electric consumers and electric utility services to be rendered in this State. Specifically, this project will affect the reliability of the electric supply available to Connecticut consumers and also the rates charged to Connecticut ratepayers. The Application states (Executive Summary, p. ES-1) that the project is needed to “improve the bulk power electric transmission system Southern New England (*sic*) and achieve future compliance with applicable national and regional reliability standards and criteria. It also states (Executive Summary, p. ES-23) that the estimated capital cost of the project will be approximately \$213.7 Million. CL&P will seek to recover costs in regulated rates, which, if approved, which will be imposed on Connecticut ratepayers at least in part.
6. CL&P is the applicant in this matter. OCC has a long history of advocating the interests of CL&P customers, before the Connecticut Department of Public Utility Control and otherwise. OCC’s application for party status in the present proceeding is consistent with that history.
7. OCC, on behalf of the electric consumers it represents, has legal rights, duties and privileges that will be affected by the outcome of this proceeding. This consumer interest cannot be adequately represented by any other party.

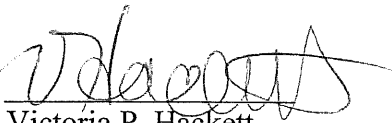
8. OCC seeks full rights as a party in this proceeding, including the rights to conduct discovery, introduce and review evidence, cross-examine witnesses, submit briefs and present argument.
9. OCC's participation in this proceeding is in the public interest and good cause exists to grant this Motion. OCC's participation will not impair the interests of justice or impair the orderly conduct of the proceeding.
10. OCC's participation in this proceeding will not prejudice any other party or intervenor. For instance, OCC intends to execute any confidentiality agreements that may be necessary for its participation in this proceeding.
11. Communications concerning this proceeding should be served upon the following persons:

Elin Swanson Katz
Consumer Counsel
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e-mail: elin.katz@ct.gov

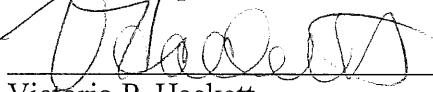
Victoria Hackett
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Respectfully submitted,

ELIN SWANSON KATZ
CONSUMER COUNSEL

By: 
Victoria P. Hackett
Staff Attorney III

I hereby certify that a copy
of the foregoing has been mailed,
electronically sent and/or
hand-delivered to all known
parties and intervenors of record this
17th day of April, 2012.


Victoria P. Hackett
Commissioner of Superior Court