

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

The Connecticut Light & Power 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. )

**Docket 424**

**July 17, 2012**

**REQUEST FOR INTERVENOR STATUS**

ISO New England Inc. (the "ISO") of One Sullivan Road, Holyoke, Massachusetts 01040, hereby requests that the Connecticut Siting Council (the "Council") grant it intervenor status in the above-captioned proceeding pursuant to Section 16-50n and Section 4-177a of the Connecticut General Statutes and Section 16-50j-15a of the Regulations of Connecticut State Agencies.

The ISO, a private, non-profit corporation which serves as the independent system operator of the New England bulk power grid and as the regional transmission organization for the New England region, is requesting intervenor status in the above-captioned proceeding because it has substantial interests that may be affected by the proceeding. The ISO is responsible for the day-to-day reliable operation of the New

England region's bulk electric generation and transmission system and is charged by the Federal Energy Regulatory Commission to plan for and ensure a reliable bulk power system for New England. The proposed transmission projects and related improvements involve the Connecticut portion of a larger project known as the Interstate Reliability Project ("IRP") which is in turn part of the New England East-West Solution ("NEEWS"), an overall transmission-based solution to electric system reliability needs in Connecticut, Massachusetts and Rhode Island.

The ISO has recently updated the evaluation of power system reliability and need for the IRP, and the ISO has concluded that the IRP continues to be needed based on current and reasonably foreseeable circumstances affecting the power system in Connecticut and in the other states to be served by the IRP. The outcome of this proceeding will therefore impact the reliability of the electric system in these states and more broadly in New England, and the ISO therefore has significant interests at stake in this proceeding.

The ISO requests intervenor status in this docket in order to monitor the proceedings by receiving filings and notices from the Council, the applicant and other parties and intervenors, particularly with respect to system reliability and the need for the IRP. The ISO may also participate in the proceeding by filing written testimony, presenting expert witnesses and by cross-examining witnesses with respect to reliability and need. The ISO believes its unique expertise in the area of electric generation, transmission, system reliability, and bulk power system operation planning and operation can assist the Council in resolving reliability and need issues in this docket and will not

impair the orderly conduct of the proceedings with respect to the Council's determination of need for the IRP.

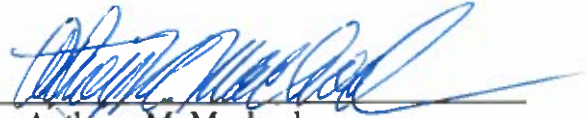
The ISO requests that it be included on the service list for this docket as follows:

Anthony M. Macleod, Esq.  
Whitman Breed Abbott & Morgan  
500 West Putnam Avenue  
Greenwich, Connecticut 06830  
203-862-2458  
[amacleod@wbamct.com](mailto:amacleod@wbamct.com)

Kevin Flynn, Esq.  
Regulatory Counsel  
ISO New England Inc.  
One Sullivan Road  
Holyoke, MA 01040  
413-535-4177  
[kflynn@iso-ne.com](mailto:kflynn@iso-ne.com)

ISO NEW ENGLAND INC.

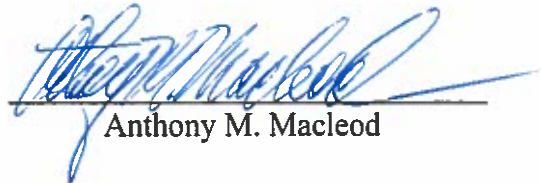
By



Anthony M. Macleod  
Whitman Breed Abbott & Morgan LLC  
500 West Putnam Avenue  
Greenwich, Connecticut 06830  
Telephone: 203-869-3800  
Its Attorneys  
[amacleod@wbamct.com](mailto:amacleod@wbamct.com)

**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the foregoing has been electronically mailed or sent by U.S. Mail on this 17th day of July, 2012, upon all parties and intervenors as referenced in the Connecticut Siting Council's Service List dated June 4, 2012, as attached hereto.



Anthony M. Macleod