## CONNECTICUT SITING COUNCIL

DOCKET NO. 431 – South Norwalk : DOCKET 431

Electric and Water application for a :

Certificate of Environmental

Compatibility and Public Need for the :

construction, maintenance, and : operation of an electrical substation : and its connection to an existing 115 kV

and its connection to an existing 115 kV : transmission line, located at 180 Martin : Luther King, Jr. Drive, Norwalk, :

Connecticut. : October 16, 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 Second Taxing District of the City of Norwalk, South Norwalk Electric and Water ("SNEW") has applied to the Council for a Certificate of Environmental Compatibility and Public Need (the "Certificate") for a new 115-kV/13.8-kV substation to be located at 180 Dr. Martin Luther King, Jr. Drive in Norwalk, CT (the "Substation").
- 4. As explained in SNEW's application, the Substation would be served by and interconnected with CL&P's 1890 transmission line (115-kV). CL&P's 1890 Line extends between CL&P's Glenbrook Substation in Stamford, CT and its Sherwood Substation in

Westport, CT. CL&P would construct and install, own, operate and maintain the following transmission line structures and equipment to interconnect its 1890 Line with the Substation and transmission equipment within the Substation: (1) three transmission line support structures located within or partially within the railroad right-of-way (two of them would be adjacent to the Substation site) as well as line conductor and fiber optic communication cable supported by these structures that would be looped into the Substation, (2) two new steel A-frame terminal structures within the Substation that would support the conductor and fiber optic cable entering the Substation, line disconnect equipment and line monitoring and protection equipment, (3) various other components of equipment for the Substation (such as the circuit breaker), and (4) a protection and control equipment enclosure ("P&C Enclosure") with approximate dimensions of 36 feet by 24 feet that would contain transmission communications, control, monitoring and protection systems, a transmission SCADA system, power panels for the Substation AC power system and DC power system for the P&C Enclosure, as well as heating, ventilation and air conditioning equipment. See Application at 39-41.

- 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.
- 6. If the Council grants the Certificate, the Substation would be directly interconnected with CL&P's 1890 transmission line via new CL&P transmission interconnection facilities that would supply electricity to the Substation and would connect to CL&P-owned, maintained and operated transmission equipment within the 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 SNEW and CL&P to construct, install, own and operate respective facilities and equipment within the Substation and CL&P to construct, own and operate new transmission facilities to interconnect the Substation with CL&P's transmission line and network in southwestern Connecticut. CL&P is affected because the proposed project would include (i) construction of CL&P's interconnection facilities, (ii) construction and installation of CL&P's transmission facilities and equipment within the Substation and (iii) the operation of the Substation would need to be appropriately integrated into CL&P's transmission network. Accordingly, CL&P has substantial rights and interests that are at issue in this proceeding.
- 7. 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 a 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.
- 8. Correspondence and other communications in regard to this matter should be served upon the following persons:

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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

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## **CERTIFICATION**

I hereby certify that on this 16th day of October, 2012, that one (1) copy of the foregoing document was sent via electronic mail to all persons on the following Service List for this proceeding.

Jeffery D. Cockian
Jeffery D. Cochran

## **Connecticut Siting Council Docket 431**

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