

CONNECTICUT SITING COUNCIL

DOCKET NO. 433 – The United :
Illuminating Company application for a :
Certificate of Environmental :
Compatibility and Public Need for the :
construction, maintenance, and :
operation of a 115/13.8 kilovolt :
substation located at 14 Old Stratford :
Road, Shelton, Connecticut :

DOCKET 433

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CONNECTICUT
SITING COUNCIL

January 3, 2013

MOTION OF
THE CONNECTICUT LIGHT AND POWER COMPANY FOR INTERVENOR STATUS

Pursuant to §§ 4-177a and 16-50n of the Connecticut General Statutes (“Conn. Gen. Stat.”) and § 16-50j-15 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 intervenor 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 United Illuminating Company (“UI”) 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 14 Old Stratford Road in Shelton, Connecticut (the “Project”).
4. UI’s proposed new substation would be served by and interconnected with CL&P’s 1560 transmission line (115-kV), which extends between CL&P’s Stevenson Substation in Monroe, CT and Devon Switching Station in Milford, CT. The right-of-way (“ROW”) for the 1560 line passes over the western portion of UI’s property and the substation would be built immediately adjacent to CL&P’s ROW. UI would construct the four transmission line monopole structures on UI’s property outside the substation and install transmission line conductors from these four line structures to two line terminal structures within the new substation. See UI Application at ES-4, 21-22, 41. Upon completion of the Project, UI would convey ownership of the four monopole structures outside the substation to CL&P. Thereafter, CL&P would own,

operate and maintain these monopole structures. UI would own, operate, and maintain the transmission line conductors entering into its new substation. These conductors would be connected to CL&P's 1560 line via "jumper cables."

5. CL&P's requests the right to participate as an intervenor in this proceeding to monitor these proceedings, including any modifications to the Project recommended by the Council and other participants in this proceeding. CL&P does not intend to present pre-filed or direct testimony or to cross-examine witnesses; however, CL&P may wish to file written comments or a brief on issues affecting its interests. If the Council grants the Certificate, UI's new substation would be directly interconnected with CL&P's 1560 transmission line via new transmission interconnection facilities that would supply electricity to UI's substation. CL&P is affected by the Project because: (i) the Project would include construction of four transmission line structures that would be conveyed to CL&P following completion of the Project and thereafter CL&P would own, operate and maintain these transmission structures, and (ii) the operation of the new substation would need to be appropriately integrated into CL&P's transmission network.

6. R.C.S.A. §16-50j-15 authorizes the Council to grant intervenor status in a contested case if a person submits a written petition stating "facts that demonstrate that the petitioner's participation shall furnish assistance to the Council in resolving the issues in the proceeding, in in the interest of justice and will not impair the orderly conduct of the proceeding." For the reasons explained above, CL&P respectfully submits that its participation as an intervenor in this proceeding satisfies the criteria in Conn. Gen. Stat. § 4-177a and R.C.S.A. § 16-50j-15.

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

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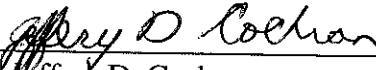
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WHEREFORE, CL&P respectfully requests that it be granted the right to participate in this proceeding as a party.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY

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CERTIFICATION

I hereby certify that on this third day of January, 2013, that one (1) copy of the foregoing document was sent via electronic mail to the following persons on the October 4, 2012 Service List for this proceeding.


Jeffery D. Cochran

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