

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

RE: APPLICATION OF THE CONNECTICUT : DOCKET NO. 461
LIGHT AND POWER COMPANY DOING :
BUSINESS AS EVERSOURCE ENERGY TO THE :
CONNECTICUT SITING COUNCIL FOR A :
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR THE :
GREENWICH SUBSTATION AND LINE PROJECT :
IN GREENWICH, CONNECTICUT : JULY 13, 2015

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

Pursuant to Connecticut General Statutes (“Conn. Gen. Stat.”) §§ 4-177a(a) and 16-2a(a), the Office of Consumer Counsel (“OCC”) hereby respectfully requests that the Connecticut Siting Council (“Siting Council”) designate OCC as a party to the above-captioned proceeding. In support of this Motion, OCC states the following:

1. Conn. Gen. Stat. § 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 the petitioner’s legal rights, duties, or privileges will be specifically affected by the agency’s decision in the case.
2. This motion is timely under Conn. Gen. Stat. § 4-177a(a) given that the Siting Council has not yet scheduled a hearing date.
3. OCC is the statutorily designated representative of Connecticut utility consumers. Under Conn. Gen. Stat. § 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.

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL
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4. In this proceeding, on June 26, 2015, the Connecticut Light and Power Company doing business as Eversource Energy (“Eversource”) filed an Application with the Siting Council for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 115-kilovolt (kV) bulk substation located at 290 Railroad Avenue, Greenwich, Connecticut, and two 115-kV underground transmission circuits extending approximately 2.3 miles between the proposed substation and the existing Cos Cob Substation, Greenwich, Connecticut, and related substation improvements (“Application”).
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 that Eversource is proposing the project to “provide immediate load relief to the electric distribution supply system in Greenwich by establishing the new bulk substation near the center of the customer electrical demand (or “load”) to avoid overloads on both distribution lines and transformers.” Eversource Application, Executive Summary, at ES-1. The Application states that the estimated cost of the project is approximately \$140 million. *See id.* at ES-11. Eversource will seek to recover costs in regulated rates, which, if approved, which will be imposed on Connecticut ratepayers, at least in part.
6. Eversource is the applicant in this matter. OCC has a long history of advocating for the interests of Eversource customers, before the Connecticut Public Utilities Regulatory Authority (formerly the 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 at OCC:

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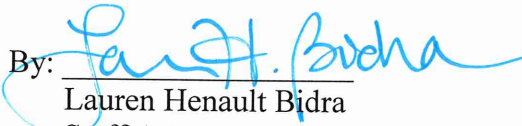
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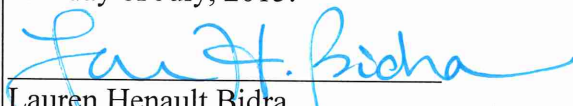
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Respectfully submitted,

ELIN SWANSON KATZ
CONSUMER COUNSEL

By: 
Lauren Henault Bidra
Staff Attorney

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
13th day of July, 2015.


Lauren Henault Bidra
Commissioner of Superior Court