



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@po.state.ct.us

Web Site: www.ct.gov/esc

INTERVENOR STATUS REQUEST FORM

Docket/Petition No.

Town/City

Date

461

Greenwich

08/03/2015

Name:

Pet Pantry Super Discount Stores LLC

Street Address:

290 Railroad Avenue

City, State, Zip:

Greenwich, CT 06840

Contact Number:

212-889-7460

E-mail:

BJJ@jpfay.com

1. Manner in which intervenor's participation is in the interests of justice and will not impair the orderly conduct of the proceedings:

Requestor is a tenant of the Applicant. It intends to participate to protect its interest in a contested leasehold located at the proposed site of the electrical transmission substation. It intends to cross-examine witnesses, introduce and present evidence, file briefs, and conduct such discovery as permitted. Applicant's petition deprives the Requestor's rights as a tenant at 290 Railroad Ave.. Applicant claims to have a right to terminate Requestor's tenancy if Applicant proposes to use the site as a transmission substation. The requestor claims certain rights to the leasehold which are yet to be determined. The Requestor has leased the property since 1971, employs 35 persons, sells pet products and equipment to the Greater Greenwich area, pays taxes to the Town of Greenwich, and is extremely active in the town. It hosts and sponsors various charitable events such as Adopt-A-Pet, Cat Assistance, Pet Rescues as well as other events. It donates both time and funds to the community. The construction of this substation would result in the dispossession of a long standing member of the Greenwich community. The location of the substation is unnecessary and detrimental to the health, economy, geography, welfare and esthetic value of the Greenwich area. There are more viable alternatives that exist including the improvement to the current substation located across the street. The substation will not significantly improve service nor is there significant need for its construction. The Requestor seeks to have this application denied or that the site be relocated to a more suitable area

2. Manner and extent to which intervenor proposes to participate:

Conducting discovery as is permitted, submission of questions, cross-examination of witnesses, introduction and presentation of evidence, presentation of arguments, and the filing of briefs on the matters before the Council

3. Statutory authority for intervenor request:

Conn. Gen. Stat. Secs. 4-177a (b); 16-50n (a)(4), and 16-50o


4. Nature of evidence intervenor intends to present:


Requestor holds a leasehold interest in the property and continues to do so until such time as may be determined, the establishment of a substation would dispossess the tenant, creating a loss of revenue and jobs in the Greenwich area, and the loss of a significant contributor to charitable programs and events to the community. The Requestor will present such information as well as demonstrating that the location of the substation is unnecessary and detrimental to the health, economy, geography, welfare and esthetic value to the Greenwich area. It will also show that more viable alternatives exist including the improvement to the current substation which is located across the street at its current site. It will further show that the substation will not significantly improve service nor is there a significant need for construction. The Requestor seeks to have this application denied or that the site be relocated to a more suitable area.

Copies of this request are required to be electronically mailed to all participants on the service list, which can be found on our website in Pending Proceedings under the appropriate docket or petition number, at least five days before the date of the public hearing.

Signature Pet Pantry Super Discount Stores LLC

Date





By: Adam J. Jacobson, Exec. Vice President
and Managing Member, Duly Authorized

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: Eversource Energy Application for a : Docket # 461
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. : August 5, 2015

Applicant

CERTIFICATION

I hereby certify that on August 5, 2015, a copy of the foregoing Request for Intervenor Status was filed electronically and the original and 15 copies was served to all known parties, applicant and intervenors to: by U.S. Mail first class postage prepaid and by electronic mailing to:

The Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
Sitingcouncil@po.state.ct.us

See Attached Service List

By ~~s/Mark L. Bergamo~~
Mark L. Bergamo
The Marcus Law Firm
Its Attorneys
275 Branford Road
North Branford, CT 06471
Tel. 203-481-3330
mbergamo@marcuslawfirm.com
CT Bar Number 035870

LIST OF PARTIES AND INTERVENORS
SERVICE LIST

Status Granted	Document Service	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	<input checked="" type="checkbox"/> E-Mail	Eversource Energy	<p>Jacqueline Gardell Project Manager Eversource Energy 56 Prospect Street Hartford, CT 06103 jacqueline.gardell@eversource.com</p> <p>John Morissette Project Manager-Transmission Siting-CT Eversource Energy 56 Prospect Street Hartford, CT 06103 john.morissette@eversource.com</p> <p>Jeffery Cochran, Esq. Senior Counsel, Legal Department Eversource Energy 107 Selden Street Berlin, CT 06037 jeffery.cochran@eversource.com</p> <p>Marianne Barbino Dubuque Carmody Torrance Sandak & Hennessey LLP 50 Leavenworth Street Waterbury, CT 06702 mdubuque@carmodylaw.com</p>
Party Approved on July 23, 2015	<input checked="" type="checkbox"/> E-Mail	Office of Consumer Counsel	<p>Lauren Henault Bidra, Esq. Staff Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Lauren.bidra@ct.gov</p> <p>Joseph A. Rosenthal, Esq. Principal Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Joseph.rosenthal@ct.gov</p>

			Margaret Bain Associate Rate Specialist Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Margaret.bain@ct.gov
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PARTY STATUS REQUEST FORM

Docket/Petition No.

461

Town/City

Greenwich

Date

08/03/2015

Name:

Pet Pantry Super Discount Stores LLC

Street Address:

290 Railroad Avenue

City, State, Zip:

Greenwich, CT 06840

Contact Number:

212-889-7460

E-mail:

BJJ@jpd.com

1. Manner in which party's legal rights, duties, or privileges will be specifically affected by the agency's decision in this contested case:

Requestor is a tenant of the Applicant. It intends to participate to protect its interest in a contested leasehold located at the proposed site of the electrical transmission substation. It intends to cross-examine witnesses, introduce and present evidence, file briefs, and conduct such discovery as permitted. Applicant's petition deprives the Requestor's rights as a tenant at 290 Railroad Ave.. Applicant claims to have a right to terminate Requestor's tenancy if Applicant proposes to use the site as a transmission substation. The requestor claims certain rights to the leasehold which are yet to be determined. The Requestor has leased the property since 1971, employs 35 persons, sells pet products and equipment to the Greater Greenwich area, pays taxes to the Town of Greenwich, and is extremely active in the town. It hosts and sponsors various charitable events such as Adopt-A-Pet, Cat Assistance, Pet Rescues as well as other events. It donates both time and funds to the community. The construction of this substation would result in the dispossession of a long standing member of the Greenwich community. The location of the substation is unnecessary and detrimental to the health, economy, geography, welfare and esthetic value of the Greenwich area. There are more viable alternatives that exist including the improvement to the current substation located across the street. The substation will not significantly improve service nor is there significant need for its construction. The Requestor seeks to have this application denied or that the site be relocated to a more suitable area

2. Manner and extent to which party proposes to participate:

Conducting discovery as is permitted, submission of questions, cross-examination of witnesses, introduction and presentation of evidence, presentation of arguments, and the filing of briefs on the matters before the Council

3. Statutory authority for party request:

Conn. Gen. Stat. Secs. 4-177a; 16-50n, and 16-50o


4. Nature of evidence party intends to present:

Requestor holds a leasehold interest in the property and continues to do so until such time as may be determined, the establishment of a substation would dispossess the tenant, creating a loss of revenue and jobs in the Greenwich area, and the loss of a significant contributor to charitable programs and events to the community. The Requestor will present such information as well as demonstrating that the location of the substation is unnecessary and detrimental to the health, economy, geography, welfare and esthetic value to the Greenwich area. It will also show that more viable alternatives exist including the improvement to the current substation which is located across the street at its current site. It will further show that the substation will not significantly improve service nor is there a significant need for construction. The Requestor seeks to have this application denied or that the site be relocated to a more suitable area.

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Signature Pet Pantry Super Discount Stores LLC

Date



08/04/15

BY Adam J. Jacobson, Exec. Vice President
and Managing Member Duly Authorized

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IN RE: Eversource Energy Application for a : Docket # 461
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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. : August 5, 2015

Applicant

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I hereby certify that on August 5, 2015, a copy of the foregoing Request for Party Status was filed electronically and the original and 15 copies was served to all known parties, applicant and intervenors to: by U.S. Mail first class postage prepaid and by electronic mailing to:

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See Attached Service List

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Applicant	<input checked="" type="checkbox"/> E-Mail	Eversource Energy	<p>Jacqueline Gardell Project Manager Eversource Energy 56 Prospect Street Hartford, CT 06103 jacqueline.gardell@eversource.com</p> <p>John Morissette Project Manager-Transmission Siting-CT Eversource Energy 56 Prospect Street Hartford, CT 06103 john.morissette@eversource.com</p> <p>Jeffery Cochran, Esq. Senior Counsel, Legal Department Eversource Energy 107 Selden Street Berlin, CT 06037 jeffery.cochran@eversource.com</p> <p>Marianne Barbino Dubuque Carmody Torrance Sandak & Hennessey LLP 50 Leavenworth Street Waterbury, CT 06702 mdubuque@carmodylaw.com</p>
Party Approved on July 23, 2015	<input checked="" type="checkbox"/> E-Mail	Office of Consumer Counsel	<p>Lauren Henault Bidra, Esq. Staff Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Lauren.bidra@ct.gov</p> <p>Joseph A. Rosenthal, Esq. Principal Attorney Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051 Joseph.rosenthal@ct.gov</p>

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Greenwich, Connecticut, and related substation :
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Applicant

APPEARANCE

Please enter the Appearance of The Marcus Law Firm, 275 Branford Road, North Branford, Connecticut 06471, Tel. 203-481-3330, Fax. 203-488-4070 as attorneys for the Pet Pantry Super Discount Stores LLC.

Communications, pleadings and documents should be served to the following:

Mark L. Bergamo, Esq.
The Marcus Law Firm
(Attorneys)
275 Branford Road
North Branford, CT 06471
Telephone # (203) 481-3330
mbergamo@marcuslawfirm.com

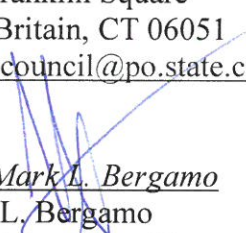
Edward L. Marcus, Esq.
The Marcus Law Firm
(Attorneys)
275 Branford Road
North Branford, CT 06471
Telephone # (203) 481-3330
emarcus@marcuslawfirm.com


s/ Mark L. Bergamo
Mark L. Bergamo, Esq.
The Marcus Law Firm
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