

FRANCA L. DeROSA
ATTORNEY-AT-LAW

Direct: 860-509-6539
Fax: 860-509-6639
fderosa@brownrudnick.com

185 Asylum
Street
Hartford
Connecticut
06103
tel 860.509.6500
fax 860.509.6501

May 30, 2018

VIA ELECTRONIC MAIL AND OVERNIGHT DELIVERY

Mr. Robert Stein, Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 483 – The United Illuminating Company Application for a Certificate of Environmental Compatibility and Public Need for the Pequonnock Substation Rebuild Project – Petition of PSEG Power Connecticut LLC to Intervene

Dear Chairman Stein:

Enclosed are an original and fifteen (15) copies of the Petition of PSEG Power Connecticut LLC to Intervene in Docket No. 483. Please contact Philip M. Small, Esq. or me at (860) 509-6500 with any questions.

Very truly yours,

BROWN RUDNICK LLP

By: 
Franca L. DeRosa

Enclosure

cc: Service List, Docket No. 483
Bruce McDermott, Esq., Murtha Cullina LLP
Mr. Ronald Rossetti, The United Illuminating Company
Ms. Samantha Marone, The United Illuminating Company

b
r
o
w
n
r
u
d
n
i
c
k
.
c
o
m

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

THE UNITED ILLUMINATING COMPANY) **DOCKET NO. 483**
APPLICATION FOR A CERTIFICATE OF)
ENVIRONMENTAL COMPATIBILITY AND)
PUBLIC NEED FOR THE PEQUONNOCK)
SUBSTATION REBUILD PROJECT THAT)
ENTAILS CONSTRUCTION, MAINTENANCE, AND)
OPERATION OF A 115/13.8-KILOVOLT (KV))
GAS INSULATED REPLACEMENT SUBSTATION)
FACILITY LOCATED 700 FEET SOUTHWEST OF)
UI'S EXISTING PEQUONNOCK SUBSTATION ON)
AN APPROXIMATELY 3.7 ACRE PARCEL OWNED)
BY PSEG POWER CONNECTICUT, LLC AT 1)
KIEFER STREET, BRIDGEPORT, CONNECTICUT,)
AND RELATED TRANSMISSION STRUCTURE)
AND INTERCONNECTION IMPROVEMENTS) May 30, 2018

PETITION OF PSEG POWER CONNECTICUT LLC TO INTERVENE

PSEG Power Connecticut LLC ("PSEG") hereby petitions the Connecticut Siting Council ("Council"), to be designated an intervenor in this proceeding pursuant to Connecticut General Statutes Section 4-177a(b) and Section 16-50j-15 of the Regulations of Connecticut State Agencies. In support of this petition, PSEG states as follows:

(1) PSEG is a Connecticut limited liability company. PSEG owns and operates Bridgeport Harbor Generating Station ("BHS") located at 1 Atlantic Street, Bridgeport, Connecticut. BHS currently includes four operating generating units, and a generating unit under construction (Unit #5), which was approved by the Council in Petition No. 1218.

(2) In Docket No. 483, The United Illuminating Company ("UI") filed an "Application to the Connecticut Siting for a Certificate of Environmental Compatibility and Public Need for the Pequonnock Substation Rebuild Project in Bridgeport, Fairfield County, Connecticut" (the "Application"). As described in the Executive Summary ("ES") to the

Application: "The substation site abuts Bridgeport Harbor to the northeast, but is otherwise surrounded by and situated within fenced property owned by PSEG Power Connecticut LLC (PSEG) and developed as the Bridgeport Harbor Station (BHS) Generating Facility.... Four of the existing 115-kV lines that feed Pequonnock Substation are located on catenary structures along the railroad; the fifth line, on PSEG's property, extends from BHS Unit #3 to feed the substation." Application, ES-2. Further, the "3.7-acre Project site is located at 1 Kiefer Street and is owned by PSEG.... UI and PSEG have entered into a Memorandum of Understanding regarding UI's purchase of this site, which has long been used for various industrial purposes. The site includes approximately 2 acres of vacant land within PSEG's fenced BHS property *Id.* Additionally, three new galvanized steel monopole structures will be installed on PSEG's BHS property and certain underground cables will be aligned across PSEG property. *Id., ES-5.*

UI's application provides significant additional detail on the involvement of PSEG's BHS property in UI's proposed project.

(3) PSEG does not oppose UI's proposed Project. However, PSEG wishes to intervene in this docket to monitor this proceeding and to protect its BHS-related interests.

(4) If designated an intervenor, PSEG may present evidence, cross-examine witnesses, file briefs and other pleadings, and otherwise participate in this proceeding.

(5) Correspondence and other communication in regard to this matter should be served upon the following people:

Franca L. DeRosa, Esq.
Philip M. Small, Esq.
Brown Rudnick LLP
CityPlace I, Floor 38
185 Asylum Street
Hartford, CT 06103-3402

(860) 509-6500 (office)
(860) 509-6501 (fax)
fderosa@brownrudnick.com (email)
psmall@brownrudnick.com (email)

With copies to:

Leilani M. Holgado Esq.
PSEG Services Corporation
80 Park Plaza, T5C
Newark, NJ 07102-4194
(973) 430-5521 (office)
(973) 802-1267 (fax)
leilani.holgado@pseg.com (email)

WHEREFORE, for the reasons described herein, PSEG requests that it be designated an intervenor in this proceeding.

Respectfully submitted,

PSEG POWER CONNECTICUT LLC

By: 

Franca L. DeRosa, Esq.
Philip M. Small, Esq.
Brown Rudnick LLP
CityPlace I, Floor 38
185 Asylum Street
Hartford, CT 06103-3402
Its Attorneys