

STATE OF CONNECTICUT  
OFFICE OF CONSUMER COUNSEL  
TEN FRANKLIN SQUARE, NEW BRITAIN, CT 06051-2644  
PHONE: (860) 827-2900 --- FAX: (860) 827-2929 --- INTERNET: <http://www/ct.gov/occ>

STATE OF CONNECTICUT

**RECEIVED**  
SEP 20 2011

CONNECTICUT SITING COUNCIL

CONNECTICUT  
SITING COUNCIL

CONNECTICUT SITING COUNCIL : LIFE CYCLE 2011  
INVESTIGATION INTO THE ELECTRIC :  
TRANSMISSION LINE LIFE-CYCLE COSTS : SEPTEMBER 20, 2011

ORIGINAL

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

Pursuant to the General Statutes of Connecticut (Conn. Gen. Stat.) § 16-2a(a), the Office of Consumer Counsel (OCC) hereby requests party status in the above-captioned proceeding. In support of this Motion, OCC states:

1. 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 Connecticut Siting Council (CSC) docket is such a regulatory proceeding.
2. In this proceeding, pursuant to Conn. Gen. Stat. § 16-50r(b), the CSC is investigating life-cycle costs for both overhead and underground electric transmission line alternatives. The scope of the investigation includes, but is not limited to, an inquiry into all relevant life-cycle costs, relative reliability, constraints concerning access and construction, potential environmental damage, and compatibility with the existing electric supply system.
3. The CSC's findings in this proceeding will affect the interests of Connecticut electric consumers and electric utility services to be rendered in this State. Specifically, this proceeding will have an impact on the transmission alternatives chosen for Connecticut and, therefore, will impact the reliability of the electric supply available to Connecticut consumers and also the rates charged to Connecticut ratepayers.
4. OCC, on behalf of the electric consumers it represents, has legal rights, duties and privileges that will be affected by the outcome of

STATE OF CONNECTICUT  
OFFICE OF CONSUMER COUNSEL

TEN FRANKLIN SQUARE, NEW BRITAIN, CT 06051-2644

PHONE: (860) 827-2900 --- FAX: (860) 827-2929 --- INTERNET: <http://www.ct.gov/occ>

this proceeding. This consumer interest cannot be adequately represented by any other party.

5. 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.
6. 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 either the interests of justice or the orderly conduct of the proceeding.
7. OCC's participation in this proceeding will not prejudice any other party or intervenor.
8. This filing is timely and meets the CSC proceeding schedule.
9. Communications concerning this proceeding should be served upon:

Office of Consumer Counsel  
10 Franklin Square  
New Britain, Connecticut 06051  
E-mail and two (2) paper copies are requested.

Respectfully submitted,

MARY J. HEALEY  
CONSUMER COUNSEL

By: Margaret Bain  
Margaret Bain  
Associate Rate Specialist

**CERTIFICATION**

I hereby certify that a copy of the foregoing has been mailed, either electronically or by first-class mail, and/or hand-delivered to all known participants of record this 20<sup>th</sup> day of September 2011.

Joseph A. Rosenthal  
Joseph A. Rosenthal  
Commissioner of the Superior Court