

Dennis M. Buckley, Esq.
Attorney at Law
1062 Meriden Road
Waterbury, CT 06705-3137
Tel. No. (203) 754-2582
Fax. No. (Same as Above)

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CONNECTICUT
SITING COUNCIL

January 2, 2008

Daniel Caruso, Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition NO. 831 - Waterbury Generation LLC

Dear Chairman Caruso:

I shall on January 3, 2008 file, by hand-delivery, an Original and 20 copies of a MOTION FOR INTERVENOR STATUS in the above proceeding.

Please enter my appearance on behalf of:
(1) The Brooklyn Neighborhood Association, (2) The Town Plot Neighborhood Association, Inc., (3) Mohawk Park Civic Club, (4) The Hopeville Neighborhood Association, (5) The Gilmartin Community Club, and (6) The Waterbury Neighborhood Council, with regard to their motion seeking Intervenor Status.

Permit me to further indicate that within the body of this motion is a request by these persons that the Council utilize the provisions of G.S.C. Section 16-50n.(e) to employ one or more consultants to study and measure the consequences of this proposed facility on the environment.

A copy of this letter of transmittal has been included with the mailed copies of this motion to all persons and entities listed on the Council's Service List as dated December 20, 2007.

Respectfully,

Dennis M. Buckley
Dennis M. Buckley

DMB/dmb.
enc. (21)
cc. clients

**LIST OF PARTIES AND INTERVENORS
SERVICE LIST**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
Applicant	Waterbury Generation, LLC	Joey Lee Miranda, Esq. Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200 (860) 275-8299 fax
Intervenor (Approved on December 13, 2007)	Connecticut Light & Power Company	Robert S. Golden Jr. Carmody & Torrance LLP P.O. Box 1110 Waterbury, CT 06721 203-573-1200 203-575-2600 rgolden@carmodylaw.com Robert Carberry, P.E. Manager, Transmission Siting and Permitting Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 P: 860-665-6774 carbere@nu.com Stella Pace Transmission Interconnection Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 860-665-5426 860-665-2820 Vincent P. Pace Senior Counsel Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 860-665-5426 860-665-5504

CONNECTICUT SITING COUNCIL

WATERBURY GENERATION, LLC
Petition for a Declaratory
Ruling No Certificate of
Environmental Compatibility
and Public Need is Required
for the Construction of an
Electric Generating Facility
and Associated Line Tap lo-
cated @ 725 Bank Street,
Waterbury, CT.

Petition No. 831

RECEIVED
JAN - 3 2008

CONNECTICUT
SITING COUNCIL

January 2, 2008

MOTION FOR INTERVENOR STATUS

Pursuant to the General Statutes of Connecticut, Title 4, Chapter 54, Section 4-176(d)(2), the person(s) - as defined in G.S.C. Section 4-166(9) - hereinafter named, acting by and through their attorney at law hereby move for permission to intervene in this proceeding.

In support of this petition the following statement of facts is provided in demonstration that the petitioners' participation is in the interests of justice and will not impair the orderly conduct of the proceedings.

1. Each of the "person(s)" named hereinafter is either (a) a corporation, association (unincorporated), or (b) private organization, whose members are individuals whose personal or legal rights or privileges may be affected by the construction and/or operation of the "Facility", as defined in G.S.C. Section 16-50i. subsection (a).

2. Each of the "person(s)" named hereinafter has individuals in its membership, who reside in the City of Waterbury, some of whom reside in close proximity to the proposed "Facility" and all of whom are concerned as to whether sufficient information presently has been provided to assure the Council its required opportunity to determine whether the construction of this "Facility" at the suggested site is without "substantial adverse environmental effect".

3. The petition, dated October 5, 2007, (hereinafter cited as "the Petition") declares the jurisdictional authority for its submission as G.S.C. Section 16-50k.(a) and R.C.S.A. Sections 16-50j-38 and 16-50j-39.

4. G.S.C. Section 16-50k. is entitled: "Certificate of environmental compatibility and public need. Transfer. Amendment. Excepted matters. Waiver.". Subsequent statements made within the "Petition" indicate that "WatGen" does NOT seek a Certificate of Environmental Compatibility and Public Need. Yet, the "Petition" does NOT explicitly cite the "excepted matters" language of Section 16-50k.(a) which "WatGen" relies upon in not seeking such certificate.

5. Each of the "person(s)" named hereinafter seeks further information disclosure regarding the subject matter to be listed in paragraph six of this motion in all of its various parts, as it is their belief that such disclosure, review of such information by the council, and consideration and evaluation of it in

5. Cont'd

combination with all "other information now filed or to be filed in the proceeding is necessary for the Council's use in its determination of whether there is any "substantial adverse environmental effect" associated with the construction of this "Facility"."

6. The "intervenors" propose through their participation to seek and/or supply further disclosure of information concerning the following:

(a) Is the description of the "Facility" proposed by "WatGen" complete and legally sufficient?

Comment:

The "Petition" states in pertinent part on its face page:

"... 'WatGen' hereby petitions the 'Council' to approve by declaratory ruling (1) the construction of an approximately 96 megawatt combustion turbine peaking facility... (2) and associated transmission line tap, including all associated equipment and related site improvements, (3) as well as related improvements at the Baldwin Street Substation, as described herein (collectively, the 'Project')".

(Numbers added for ease of identification)

Intervenor's purpose:

The "Petition" in II. Factual Background, Part C., Fuel Supply states in pertinent part @ Page 8:

"The primary fuel supply for the generating facility will be natural gas that will be delivered via a HIGH PRESSURE GAS MAIN. WatGen is currently reviewing alternatives for routing the HIGH PRESSURE GAS MAIN to the Site. An electrically driven compressor at the generating facility will boost the pressure to the required pressure at the combustion turbine." (Emphasis added)

6.(a) Cont'd

The Responses of WatGen to the Pre-Hearing Interrogatories dated November 26, 2007 @ Page 5 provided the following:

Question No. 7: "Where is the existing natural gas source? Has WatGen determined the route of the natural gas line? If not, why not?"

Response: "WatGen is currently negotiating the terms of the natural gas interconnection agreement with YankeeGas. Attachment D contains a figure showing the likely route the interconnection will take from YankeeGas LNG facility off Railroad Hills Street to the WatGen facility site, a distance of approximately 4,700 feet."

Intervenor's Question:

"Does the 'interconnection' constitute a "FUEL TRANSMISSION FACILITY" as defined in G.S.C. Section 16-50i(a)(2)?" Has WatGen provided sufficient disclosure of information to permit the Council to determine whether this 'interconnection' does in fact qualify as a "fuel transmission facility"? Has an ABUTTERS' LIST been created similar to that submitted by FirstLight Power Resources, Inc. in reference to the Right of Way contemplated as being used in the proposed TRANSMISSION LINE TAP, which indicates how many parcels of land abut the 4,700 feet of this FUEL TRANSMISSION LINE? Were any Certified Mail Letters similar to that of October 1, 2007 issued as a courtesy notice to any owners of property abutting this possible FUEL TRANSMISSION LINE? If this 'interconnection' does constitute a fuel transmission facility in accordance with G.S.C. Section 16-50i(a)(2) does either G.S.C.

6.(a) Cont'd

Intervenor's Question: Cont'd

Section 16-243m.(g) or the Council Decision, dated July 3, 2007, Petition No. 816: Waterbury Generation LLC Petition for a Declaratory Ruling, etc., or any other provision of law except such "facility" from compliance with G.S.C. Section 16-50k.(d), Section 16-50l, and Section 16-50p.?

(b) Is there any legal difference in the review, evaluation, and determination which is requested of the Council in a petition made pursuant to G.S.C. Section 16-50k.(a)(2) that the construction or location of this facility will NOT have a "substantial adverse environmental effect" from a like review, evaluation, and determination when the Council is requested in an APPLICATION to grant a CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED?

Comment:

The "Petition" @ Page 2, declares seemingly with emphasis that WatGen has NOT filed an APPLICATION with the council for a Certificate of Environmental Compatibility and Public Need. In Fact, such declaration closely follows WatGen's assertion that their project is NOT subject to municipal regulation or restriction in accordance with G.S.C. Section 16-50x.(d).

Intervenor's purpose:

G.S.C. Title 16, Ch. 277a, Section 16-50g. states in pertinent part:

"The legislature finds that power generating plants and transmission lines for electricity and fuels,...have had a significant impact on the environment and ecology of the

6.(b) Cont'd

Intervenor's purpose: Cont'd

state of Connecticut; and that continued operation and development of such power plants, lines..., if not properly planned and controlled, could adversely affect the quality of the environment and the ecological, scenic, historic, and recreational values of the state. The purposes of this chapter are: To provide for the balancing of the need for adequate and reliable public utility services at the lowest reasonable cost to consumers with the need to protect the environment and ecology of the state and to minimize damage to scenic, historic, and recreational values; to provide environmental quality standards and criteria for the location, design, construction and operation of facilities for the furnishing of public utility services at least as stringent as the federal environmental quality standards and criteria, ...to require annual forecasts of the demand for electric power, together with identification and advance planning of the facilities needed to supply that demand..".

Intervenor's Question:

Does not the findings and purpose of the Public Utility Environmental Standards Act (G.S.C. Secs. 16-50g., et seq.) require the Council to apply the same environmental quality standards and criteria for the location, design, construction and operation of this facility whether holding a CERTIFICATION PROCEEDING (See, G.S.C. Section 16-50n.(a)) or a DECLARATORY RULING PROCEEDING (See, G.S.C. Section 16-50n.(a))? If the same standards are NOT applied by the Council, what are the differences in the standards, so that such criteria may be communicated to any environmental consultants retained by the intervenors to review materials submitted for review, evaluation, and determination of whether the location or construction of this facility will have any "substantial adverse environmental effect". If either WatGen or the Council holds the position that a different en-

6.(b) Cont'd

Intervenor's Question: Cont'd

environmental quality standard and/or criteria applies to a Declaratory Ruling Proceeding than to a Certification Proceeding, what is the legal authority cited by either for such variation of the environmental quality standards and criteria?

6.

(c) Is the Council's determination of whether there is any "substantial adverse environmental effect" a cumulative determination regarding the "project" as a whole or is such determination required also as to its "components"?

Comment:

The "Petition" @ Page 3 identifies the proposed interconnection with the CL&P transmission system as a "transmission line tap" of approximately 1.8 miles in length. It then states: "(that) is, in reality, a high voltage generator lead...".

Intervenor's purpose"

G.S.C. Title 16, Ch. 277a, Section 16-50i.(e) defines the legal meaning of "transmission line tap".

Such legal definition indicates the following items of interest to this proceeding; to wit: (i) such lines are NOT requested to be treated as a "facility", (ii) such lines are to be determined as not having a "substantial adverse environmental effect", (iii) determined by the council's review of the line's proposed purpose, its proposed length, the number and types of its support structures, the number of manholes required for it, the necessity

6.(c) Cont'd

Intervenor's purpose: Cont'd

of entering a right of way including any easements or land acquisition for any construction or maintenance on the proposed line, and any other environmental, health or public safety factor considered relevant by the council.

Intervenor's Question:

Will the Council separately determine, express and explain its determination of whether there is present a "substantial adverse environmental effect" with regard to: (a) the generating facility, (b) the transmission line tap, (c) the modifications made at the CL&P Baldwin Street SubStation, and (d) the fuel transmission facility or gas transmission line from YankeeGas LNG facility to the project's site? Will the Council consider that although any of the above standing alone might NOT have a "substantial adverse environmental effect", that a combined or cumulative consequence of this project may have such a "substantial adverse environmental effect"?

6.(d)

Can the Council presently determine whether G.S.C. Section 16-50i.(a)(4) is involved in this project?

Comment:

The "Petition" @ Page 9 in describing the CL&P interconnection makes reference to a "switchyard" and "switchyard control house", which appear to at least raise the inquiry of whether any "facility" is proposed and how and/or why such should not follow an application procedure.

6.(d) Cont'd

Intervenor's purpose:

The intervenors appreciate that G.S.C. Title 16, Ch. 283, Section 16-243m.(g) with regard to projects approved by the CT DPUC pursuant to that provision states that such projects are "Eligible for expedited siting pursuant to subsection (a) of section 16-50k."

However, IT IS THE POSITION OF THESE INTERVENORS that such expedited siting can and no doubt is intended to affect the time "deadlines" set forth in Section 16-50p.(2)(A) only -- NOT the findings or purposes made and set forth in Section 16-50g --- which IT IS THE POSITION OF THESE INTERVENORS require the same application of environmental quality standards and criteria to this "Petition" as would be employed by the Council in a CERTIFICATION PROCEEDING.

Among the personal / legal rights or privileges of the individuals who are members of these organizations is the right to uniform administration and determination of these environmental quality standards and criteria, such that no "Petition" for Declaratory Proceeding lessens such standards or criteria, nor, affects the protections afforded by such standards or criteria to either the environment, or the health or public safety of the people of Waterbury, Connecticut.

6.(e) Does the Council consider consistency with local land use controls as possibly bearing upon the "environmental quality standards and criteria" to be used in its consideration of this project?

6.(e) Cont'd

Comment:

The "Petition" in Part III, E. Consistency with Local Land Use Controls states, @ Pages 15-16:

"According to the Waterbury Zoning Map (See Exhibit 5), the Property and the Transmission Route are both located in Waterbury's IG Zoning District. According to the Table of Permitted Uses from the Waterbury Zoning Regulations, the following uses are permitted within the IG zone without the need for a special permit: utility facility, garage, office, and storage or distribution plant. Utility substations and towers are also permitted uses in the IG Zoning District."

Intervenor's purpose:

IT IS THE POSITION OF THE INTERVENORS THAT this project is NOT in compliance with the Zoning Regulations of the City of Waterbury. The intervenors would be prepared to submit evidence that such project does NOT comply with the following provisions:

First, Article VIII, Sec. 8.78 which defines "Public Utility" for the purposes of the Waterbury Zoning Ordinance does NOT apply to Wat Gen.

Second, the stack of 213' is a "structure" as defined in Sec. 8.88 of the ordinance.

Third, the maximum height permitted within the IG Zone for this stack is 115' by virtue of Sec. 1.75 (Permitted height) and Sec. 2.4 footnote #5.

Fourth, the substation alterations and the switchyard are Special Exceptions uses requiring ZBA approval under Sec. 5.13-12.

Fifth, the substation and switchyard buildings must be set back from adjacent property a minimum of 25'.

Sixth, the lines between the substation and the street should be underground.

6.(e) Cont'd

Intervenor's Question:

If local regulation concerning stack height is applicable and not over-ruled by the Council, is not all information filed, which is premised upon a stack height of 213' irrelevant? Would this not also cause reasonable question as to various representations made concerning air quality impacts or alleged lack of impact?

Intervenors are attempting to obtain the services of qualified experts to review and evaluate materials concerning this project and its potential air quality impacts.

EXHIBIT 10, TRC Air Quality Analysis Report, dated September 26, 2007 states that: "The most representative, full-time weather observing station for the Waterbury area is...in Windsor Locks, Connecticut, about 33 miles northeast of the Project site.". See, Page 3 of EXHIBIT 10.

The Intervenors are aware of previous applications to the Council in which applicants sought to use information gathered from the Bradley Field airport for use in exhaust models; e.g. Docket No. 193, Application of New Milford Energy LLC .

Arguments were made to the Council in that case that models using such information were INACCURATE because the wind information recorded at such site was obtained in a relatively flat portion of the state, while the site proposed in New Milford was in a valley which it was argued could trap air in the corridor.

6.(e) Cont'd

Intervenor's Question: Cont'd

The size of the proposed New Milford plant and its proposed site required a plan seeking approval of TWO (2) 213' stacks. The issue of the peculiar topographic layout of the site making the exhaust susceptible to "downwash" were raised and became the focus of competing "national air modeling experts" - whose models did NOT reach the same conclusions.

Nonetheless, the Council concluded that such models reinforced its conclusion that emissions from operation would exceed ambient air emissions standards.

The City of Waterbury and in particular its "south end" is in a valley - often referred to as the Naugatuck Valley - the intervenors invite the Council to stand on West Side Hill, or Pine Hill, and look down onto this site to gain an appreciation of its low point in this valley.

The intervenors are just as concerned about the potential inaccurate modeling that may be submitted concerning this site - if it relies upon information gathered 33 miles away from the Naugatuck Valley.

The intervenors REQUEST THAT the Council utilize its authority under G.S.C. Section 16-50n.(e) to "...employ one or more independent consultants to study and measure the consequences of the proposed facility on the environment."

6.(f) Does the Council consider consistency with local performance standards concerning "noise or vibration" or "electromagnetic

6.(f) Cont'd

disturbance" as possibly bearing upon the "environmental quality standards or criteria" to be used in its consideration of this project?

Comment:

The Waterbury Zoning Ordinance Section 5.5, Sec. 5.51, Sec. 5.52(a),(b), Section 5.53-2, Sec. 5.53-3, Sec. 5.53-4 may all or some have application to this project. Yet, no representation has been made regarding either their applicability or compliance with some or all of these provisions.

6.(g) It appears that although the over-all size of the land owned by Ansonia Copper & Brass, Inc. at 725 Bank Street in Waterbury is 14.25 acres, the choice of WatGen to lease but 2.25 acres as its project site has eliminated an "air cooling system" and introduced a PUBLIC WATER SUPPLY into the project for a water cooled system. (See, "Petition, @ pages 6 & 20)

Intervenor's Question:

The intervenors' counsel in preparing this motion has encountered representations that in generating plants that use water in an evaporative cooling process as much as 90% of the water evaporates and is never seen again. (See, Volume 32 Connecticut Law Review No. 4, Summer 2000, pages 1443-1485, @ page 1460).

The intervenors' counsel is also aware that such article also states that opportunities to use circulated water or air condensers to cool turbines can reduce the use of water by up to 97%. (See, 32 CLR, No. 4 @ page 1460).

6.(g) Cont'd

Intervenor's Question: Cont'd

Will the Council inquire of WatGen whether an increase in the size of the project site is possible such as would permit the use of an air cooling system?

Will the Council authorize the use of water - other than potable water supplied by the City of Waterbury - as a means of protection of this environmental asset?

6.(h) Will the Council seek clarification of information and/or submission of information NOT YET FILED concerning air quality issues?

Comment:

The "Petition" @ Page 12 of Part III, A. Air Quality, states in pertinent part:

"Based on preliminary modeling, the proposed stack height of two hundred thirteen feet (213') is the maximum that may be required to comply with the new (August 21, 2007) 'CTDEP Interim PM2.5 New Source Review Modeling Policy and Procedures'. Detailed modeling results will be submitted to the DEP upon completion."

EXHIBIT 10 @ Page No. 6 item 3. Ambient Air Quality Standards states in pertinent part:

"The Connecticut and National Ambient Air Quality Standards (CAAQS/NAAQS) include Primary Standards, which are designed to protect human health, including sensitive subpopulations, such as children or those with chronic respiratory problems."

EXHIBIT 10 also includes TRC's New Source Review and Application for Permits, which includes CTDEP permit application forms, among them being DEP-AIR-APP-200, DEP-AIR-APP-210, DEP-AIR-APP-212.

6.(h) Cont'd

Comment: Cont'd

ATTACHMENT E to EXHIBIT 10 DEP-AIR-APP-210 is identified as Supplemental Application Form, Air Pollution Control Equipment. At page 3 of 7 of such form the subject matter of "Afterburner (Incinerator for Air Pollution Control)" appears followed by 20 listed items of possible information disclosure.

WatGen has replied to listed disclosure items 1a. & 1b. as follows: "1a. Designated Reference Number of Afterburner: C1a"; "1b. Designated Reference Number of Unit which uses Afterburner: U1".

WatGen then replies to item 2. "Manufacturer: To be determined". Subsequently, Wat Gen replies to item 19a) "Control Efficiency of Afterburner (%): 91 (CO), 38 (VOC) (Design)". WatGen replies to item 20 "Pollutant(s) Controlled: CO, VOC".

At Page 7 of 7 of DEP-AIR-APP-210 the subject matter of "Other Type of Control Equipment" appears followed by 7 listed items of possible disclosure.

Wat Gen again replied to 1a. & 1b. as follows: "1a. Designated reference number of other type of control equipment: C1b"; "1b. Designated reference number of unit which uses other type of control equipment: U1".

WatGen then again replies to item 2. "Manufacturer: To be determined". Subsequently, it replies to item 5. "Generic name of other equipment: Selective Catalytic Reduction". WatGen then replies to 6 a) "Control efficiency of other type of control equip-

6.(h) Cont'd

Comment: Cont'd (WatGen reply to 6a))

ment (%): 90 (Design)". WatGen further replied to 6 b) "Collection efficiency of other type of control equipment (%): 100". Finally, WatGen replied to item 7. "Pollutant(s) Controlled: NOx".

DEP-AIR-APP-212 is identified as Supplemental Application Form, Unit Emissions, page 1 of 2 making representations when Oil is used: as the Facility's fuel; and Page 2 of 2 making representations when Gas is used: as the Facility's fuel. The control equipment numbers on Page 1 of 1 are listed as "C1a, C1b" and on Page 2 of 2 the control equipment numbers are also listed as "C1a and C1b".

DEP-AIR-APP-200 in Part IV: Premise Information @ page 4 of 6 lists item for disclosure number 3. "Identify the air attainment status of the area in which the premise is or will be located. Non-Attainment for Ozone Standard; x Serious"

Intervenor's Question:

In so far as WatGen has NOT determined the manufacturer of either the AFTERBURNER or the SELECTIVE CATALYTIC REDUCTION equipment as its air emission control process what is the value of any representations offered concerning Air Quality Impacts by this Facility?

Should any reader of these representations accept that WatGen has NOT at least reviewed available equipment in terms of number(s) of qualified manufacturers, type and number of suitable equipment

6.(h) Cont'd

Intervenor's Question: Cont'd

offered by such manufctruers, facilities of similar design & capacity as that proposed by it which have employed such air control equipment, and the operational performance data concerning emissions control which such equipment has produced?

Attachment A to DEP-AIR-APP-200, Executive Summary identifies that WatGen seeks permits to construct and operate "one GE LMS100PA combustion simple-cycle turbine generator. Is this the first installation of this equipment? Has not an earlier like facility been constructed using this equipment, which in terms of operation is now on-line with active control equipment? Is there nothing to inform the people who will breath the air into which emissions from this facility will be exhausted that informs them and WatGen what control equipment should be used to assure that this facility does NOT produce any "substantial adverse environmental effect"?

Attachment J to DEP-AIR-APP-200, listed as Ambient Air Quality Analysis bears the following declaration: "The ambient impact analysis for this application will be submitted separately at a later date."

Just HOW LATE will that submission be? Will such impact analysis utilize data obtained by the Waterbury - Meadow & Bank St. Air Monitoring Station, identified in the Connecticut 2007 Annual Air Monitoring Network Plan @ Page 35 thereof. This station is listed as having been established in the year 1975. It should be a substantial source of information given its tenure of use.

6. (h) Cont'd

Intervenor's Question: Cont'd

Intervenors again respectfully request that the Council utilize G.S.C. Section 16-50n.(e) to employ one or more independent consultants to study the consequences of the proposed facility on the environment.

6.(i) Is the Council satisfied that the construction and operation of this facility is in performance of improving resources for CL&P's transmission system?

Comments:

A review of CL&P's 2006 Forecast of Loads and Resources for the period 2006-2015, particularly Chapter 5, Transmission System Needs, section 5.3 Southwest Connecticut Area @ pages 30-32 does NOT identify this project one anticipated or entering into construction.

The only project identified within this statutory forecast filed by CL&P as anticipated to be performed in the City of Waterbury appears in Table 6-4 @ page 40 identified as a SubStation Project "to expand the existing Bunker Hill Substation" (115kV) with an estimated "ISD" (in service date) of 2008.

A review of CSC's Ten Year Forecast of Connecticut Electric Loads and Resources 2006-2015 both in DRAFT form under date of October 27, 2006 and as issued, November 14, 2006 does NOT indicate this project among those listed as anticipated or entering into construction for purposes of improving the state's transmission system.

6.(i) Cont'd

Intervenor's Question:

Does not the Council still have the statutory obligation under G.S.C. Section 16-50g. to "...balance the need" for this facility and its potential contribution to the reliability of public utility services with its potential to "adversely affect the quality of the environment" within the City of Waterbury, Connecticut.

7. The person(s) - as defined in G.S.C. Section 4-166(9) - who request that they and their individual members be granted the status of Intervenor are:

- (a) The Brooklyn Neighborhood Association
(an unincorporated association)

Contact Person: Lisa Velez President

- (b) The Town Plot Neighborhood Association, Inc.

Contact Person: Joseph Savoy, President

- (c) Mohawk Park Civic Club
(an unincorporated association)

Contact Person: Antoinette D'Almeida, President

- (d) The Hopeville Neighborhood Association
(an unincorporated association)

Contact Person: Ivette Jessop, President

- (e) The Gilmartin Community Club
(an unincorporated association)

Contact Person: Steven Shrag, President

- (f) The Waterbury Neighborhood Council
(City-Wide Association of the Neighborhood Groups)

Contact Person: Joshua Angelus, President.

8. As many of the individuals listed as contact persons work and may NOT be able to appear and participate on all dates which

8. Cont'd

may be assigned for this proceeding, it is therefore respectfully requested that these persons be grouped as intervenors.

Dated at Waterbury, Connecticut this 2nd day of January, 2008.

Prepared for and Submitted
on behalf of the following:

The Brooklyn Neighborhood
Association, The Town Plot
Neighborhood Association, Inc.
Mohawk Park Civic Club, The
Hopeville Neighborhood Assoc-
iation, The Gilmartin Commu-
nity Club, The Waterbury Neigh-
borhood Council.

By:

Dennis M. Buckley
Dennis M. Buckley
Attorney at Law
1062 Meriden Road
Waterbury, CT 06705-3137
Tel. No. (203) 754-2582
Fax. No. (Same as Above)
Juris No. 007045

CERTIFICATION:

This is to certify that a copy of the foregoing MOTION FOR INTERVENOR STATUS was mailed first class delivery, & postage pre-paid to each individual listed on the Service List dated 12/20/07, a copy of which is attached hereto, on January 3, 2008.

Dated at Waterbury, Connecticut this 3rd day of January, 2008.

Dennis M. Buckley
Dennis M. Buckley
Commissioner of the Superior
Court, State of Connecticut
Juris No. 007045