

CONNECTICUT SITING COUNCIL

DRAFT WIND REGULATIONS

JUNE 1, 2012

**COMMENTS OF THE CONNECTICUT LIGHT AND POWER COMPANY and
YANKEE GAS SERVICES COMPANY REGARDING DRAFT WIND REGULATIONS**

The Connecticut Light and Power Company (“CL&P”) and Yankee Gas Services Company (“YG”)(together, “the Companies”) respectfully file these comments regarding the Draft Wind Regulations issued by the Connecticut Siting Council (“Council”) pursuant to the Notice of Intent to Amend Regulations, under the authority of Public Act 11-245, *An Act Requiring the Adoption of Regulations for the Siting of Wind Projects*, published in the Connecticut Law Journal on May 1, 2012.

A. Overall Comments

In general, the proposed regulations will provide consistency in analysis, streamline the review process and provide clarity and direction to applicants and petitioners requesting Council approval of wind projects. Therefore, participants in future proceedings, staff and the Council will benefit from this regulation making process.

B. Requested Changes

CL&P requests that the Council revise its proposed wind regulations to include a requirement that applications for a certificate or a petition for declaratory ruling, for a proposed wind turbine facility in accordance with Section 16-50j-59 of Regulations of Connecticut State Agencies and Sections 16-50l-1 to 16-50l-5 and Section 16-50j-93, inclusive, of the Regulations of Connecticut State Agencies, include an appropriate study regarding line of sight, and reflective and/or multipath radio frequency interference, and/or present data that the proposed facility will not present line of sight, and reflective and/or multipath radio frequency interference to the

utilities' communications. The Companies' communications infrastructure supports their field operations, emergency restorations, and equipment operation and control. In addition, state agencies and some municipalities are licensed to install their public safety communications equipment on the Companies' telecommunications infrastructure. The Draft Wind Regulations include at Section 5, the addition of **Section 16-50j-94. Additional Information Required.**

The Companies recommend the addition of another subsection entitled,

(i) Report Regarding the Interference with Public Service Company

Communications Equipment. The applicant or petitioner, at its sole cost, shall submit a report that analyzes the potential for interference and/or impact that each of the proposed wind turbine locations and any alternative wind turbine locations for the proposed site and any alternative sites that includes, but is not limited to:

- (a)** a study regarding line of sight, and reflective and/or multipath radio frequency interference, and/or present data that the proposed facility will not present line of sight, and reflective and/or multipath radio frequency interference to the communications infrastructure of nearby utilities; and
- (b)** any necessary mitigation measures in response to any such radio frequency or optical interference. The costs of any necessary mitigation measures shall be borne by the applicant or petitioner, and shall not be passed on to the Companies and their customers.

Respectfully submitted,
THE CONNECTICUT LIGHT AND POWER COMPANY
and YANKEE GAS SERVICES

By: _____
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