

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

RE: THE UNITED ILLUMINATING COMPANY	:	DOCKET NO. 465
APPLICATION TO THE CONNECTICUT	:	
CITING COUNCIL FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE CONSTRUCTION,	:	
MAINTENANCE, AND OPERATION OF A NEW	:	
115/13.8 KILOVOLT DISTRIBUTION	:	
SUBSTATION IN THE TOWN OF	:	
STRATFORD, CONNECTICUT.	:	FEBRUARY 19, 2016

MOTION OF THE TOWN OF STRATFORD FOR “PARTY” STATUS

Pursuant to Connecticut General Statutes (“General Statutes”) §4-177a(a), the Town of Stratford (“Town”) hereby respectfully requests that the Connecticut Siting Council (“Council”) designate the Town as a party to the above-captioned proceeding. In support of this Motion, the Town states the following:

1. Connecticut General Statutes §4-177a(a) provides that a person may be granted party status in administrative proceedings like those held by the Connecticut Siting Council, if the person timely files a written petition stating facts that demonstrate that the petitioner’s legal rights, duties, or privileges will be specifically affected by the agency’s decision in the case.
2. This motion is timely pursuant to Connecticut General Statutes §4-177a(a) given that it is made at least 5 days before the scheduled hearing date.
3. Furthermore, if it is determined that this Motion was not timely filed, the requirement that the Motion be filed within 5 days of the scheduled hearing should be waived pursuant to §4-177a (c) which states: “The five-day requirement in subsections (a) and (b) of this section may be waived at any time before or after commencement of the hearing by the presiding officer on a showing of good cause.”
4. The Town of Stratford is a municipality located in the State of Connecticut with a principal address of 2725 Main Street, Stratford, Connecticut 06615.

5. In this proceeding, on December 21, 2015, the United Illuminating Company (“UI”) filed an Application with the Siting Council for a Certificate of Environmental Compatibility and Public Need for the Construction and Operation of a New 115/13.8 Kilovolt Distribution Substation in the Town of Stratford, Connecticut. (“Application”)
6. The Application proposed that the New Distribution Substation replace UI’s existing Baird Substation, and be located adjacent to the existing facility located at 1770 Stratford Avenue, Stratford, Connecticut.
7. The area where the Application proposed the facility be constructed is located exclusively within the boundaries of the Town of Stratford.
8. The decision of the Siting Council in this proceeding will substantially affect the Town of Stratford in that the proposed facility is located within the boundaries of the Town of Stratford. Furthermore the decision in this proceeding will substantially affect the interests of the residents of the Town of Stratford. More specifically, the Town and its residents will be affected by the decision of the Siting Council in that the Application seeks to address several aging infrastructure and compliance needs that threaten the reliability of electric service to the Stratford area, which is crucial to maintaining safe and reliable electric service to the residents of the Town of Stratford. The Application states: “not addressing the needs could have significant negative impacts on reliability, customer satisfaction, and the economic vitality of the region” Application, Executive Summary, at 1.
9. Stratford, on behalf of itself and its residents, has legal rights, duties, and privileges that will be affected by the outcome of this proceeding.
10. The Town of Stratford seeks full rights as a party in this proceeding, including the rights to conduct discovery, introduce and review evidence, cross-examine witnesses and present argument.
11. The Town of Stratford’s participation in this proceeding is in the public interest and good cause exists to grant this Motion. Stratford’s participation will not impair the interests of justice or impair the orderly conduct of the proceeding, nor will Stratford’s participation in this proceeding prejudice any other party or intervenor.

12. Communications concerning this proceeding should be served upon:

Bruce Jackson, Esq.
The Jackson Law Group CT, LLC
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Shelton, CT 06484
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203-647-3300

Respectfully submitted

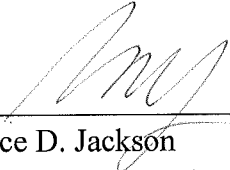
TOWN OF STRATFORD,

By:



Bruce D. Jackson

I hereby certify that a copy of the foregoing has been mailed, electronically sent and/or hand delivered to all known parties and intervenors of record this 19th day of February, 2016.



Bruce D. Jackson
Commissioner of the Superior Court