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August 29, 2012

**BY FEDERAL EXPRESS**

Nicholas Ucci, Esq., Coordinator  
Energy Facility Siting Board  
89 Jefferson Boulevard  
Warwick, RI 02888

Re: Docket No. SB-2012-1; Narragansett Electric Co. d/b/a National Grid  
Rhode Island Reliability Project

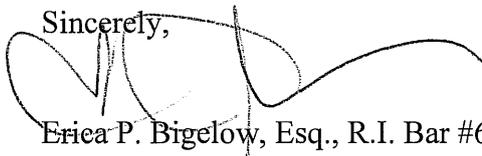
Dear Mr. Ucci:

Enclosed for filing in the above-captioned matter please find ISO New England's ("ISO-NE") Motion to Intervene. Please include me and Kevin Flynn, of ISO-NE, on the service list, as noted in the Motion to Intervene.

Please note that we are currently making efforts to obtain admission to practice before the Board in this matter *Pro Hac Vice*. In order to meet the deadline for intervention we are making this filing now and will address any other procedural matters as a follow up.

Please call me if there are any questions.

Sincerely,



Erica P. Bigelow, Esq., R.I. Bar #6584

Enclosure

cc: Eric J. Krathwohl, Esq. (via email)  
Kevin Flynn, Esq. (via email)  
Service List (Dkt. SB-2012-1)

**STATE OF RHODE ISLAND  
AND PROVIDENCE PLANTATIONS**

**ENERGY FACILITY SITING BOARD**

**DOCKET No. SB-2012-1**

**In re: Narragansett Electric Company  
d/b/a National Grid  
Interstate Reliability Project**

**MOTION TO INTERVENE OF  
ISO NEW ENGLAND INC.**

Pursuant to Section 1.10 of the Energy Facility Siting Board's Rules of Practice and Procedure, ISO New England Inc. ("ISO") hereby requests the Energy Facility Siting Board ("Board") for leave to intervene as a party in the above proceedings, stating in support thereof the following:

1. The ISO, a private, non-profit corporation which serves as the independent system operator of the New England bulk power grid and as the regional transmission organization for the New England region, is requesting intervenor status in the above-captioned proceeding because it has substantial interests that may be affected by the proceeding. The ISO is responsible for the day-to-day reliable operation of the New England region's bulk electric generation and transmission system and is charged by the Federal Energy Regulatory Commission to plan for and ensure a reliable bulk power system for New England. The outcome of this proceeding will significantly affect the reliability of the electric system in New England, and the ISO therefore has significant interests at stake in this proceeding.

2. The Board opened this docket to, among other things, determine the issues to be considered (pursuant to the August 6, 2012 Notice of Preliminary Hearing) in evaluating an application of Narragansett Electric Company d/b/a National Grid ("Narragansett" or the "Company") for a license to construct two new 345 kV transmission lines, reconstruct and reconductor an existing 345 kV transmission line, reconstruct and realign portions of various 345 transmission lines, replace structures along an existing 115 kV transmission line, all in the

existing right of way, reconstruct a switching station and retire an existing switching station on property owned by the Company and reconstruct and realign an existing 115 kV transmission line. All such work is to be done in the municipalities of Burrillville and North Smithfield.

3. Pursuant to the Notice of Preliminary Hearing, dated August 6, 2012, ISO requests that it be permitted to intervene as a party at this time in order to adequately represent and protect its interests in this proceeding. The ISO is substantially and specifically affected by this proceeding because it is responsible for the reliability of electric supply and transmission in the New England control area, which includes Rhode Island. The Project will have a significant impact on the reliability of the New England electric system. Therefore, ISO has substantial interests that may be adversely affected by the outcome of this proceeding.

4. This proceeding affords the exclusive means by which ISO can protect those interests, especially on a regional basis, and ISO's interest in this matter cannot be adequately addressed or represented by any other party. Further, ISO's unique expertise in the area of electric generation, transmission, system reliability, and bulk power system planning operation will assist the EFSB in the development of a comprehensive record and in resolving issues in this docket. Consequently, ISO's participation in this proceeding will help ensure the development of a comprehensive record, while affording ISO the opportunity to maximize its ability to fulfill its obligations as noted above.

5. If granted leave to intervene, ISO intends to participate in this proceeding by filing briefs and comments and testimony or other relevant evidence, or issuing or responding to discovery, as may be appropriate. If granted leave to intervene, ISO requests that copies of all materials filed in this docket be served on ISO as specified in paragraph 6 below.

6. All communications and correspondence for this proceeding should be directed to the undersigned and to:

Eric Krathwohl, Esq. / Erica P. Bigelow, Esq.  
Rich May, a Professional Corporation  
176 Federal Street, 6<sup>th</sup> Floor  
Boston, MA 02110-2223  
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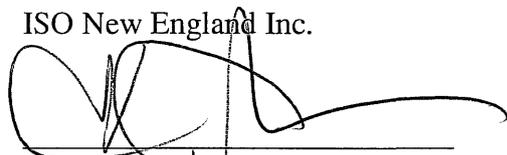
Kevin Flynn, Esq., Regulatory Counsel  
ISO New England, Inc.  
One Sullivan Road  
Holyoke, MA 01040  
(413) 535-4177 (Telephone)  
(413) 535-4379 (Fax)  
E-mail : [kflynn@iso-ne.com](mailto:kflynn@iso-ne.com)

**WHEREFORE**, ISO New England Inc. requests that it be permitted to intervene in these proceedings as a party.

Respectfully submitted,

ISO New England Inc.

By:



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Eric Krathwohl, Esq.  
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Date: August 29, 2012

**STATE OF RHODE ISLAND  
AND PROVIDENCE PLANTATIONS**

**ENERGY FACILITY SITING BOARD**

**DOCKET No. SB-2012-1**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of Section 1.7 (d) of the Public Utilities Commission's Rules of Practice and Procedure.

Dated at Boston, Massachusetts this 29<sup>th</sup> day of August, 2012

A handwritten signature in black ink, appearing to read 'Erica P. Bigelow', written over a horizontal line.

Erica P. Bigelow  
Counsel

Of Counsel for  
ISO New England, Inc.