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December 12, 2006

**VIA OVERNIGHT DELIVERY &  
ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: Narragansett Electric Company;  
Renewable Energy Standard Procurement Plan  
Docket No. 3765**

Dear Ms. Massaro:

In accordance with Section 1.13 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, enclosed please find ten (10) copies of the petition to intervene of Cape Wind Associates, LLC regarding the Renewable Energy Standard ("RES") Procurement Plan filing of The Narragansett Electric Company, d/b/a National Grid, in the above-captioned proceeding.

Thank you for your attention to this filing. Please feel free to contact me at (617) 904-3100, ext. 112 if you have any questions concerning this filing

Sincerely,

A handwritten signature in blue ink that reads "Dennis J. Duffy".

Dennis J. Duffy

DJD/lrm  
Enclosures

cc: Docket 3765 Service List  
Docket 3659 Service List (electronically)

**STATE OF RHODE ISLAND  
RHODE ISLAND PUBLIC UTILITY COMMISSION**

\_\_\_\_\_  
Narragansett Electric Company;  
Renewable Energy Procurement Plan  
\_\_\_\_\_)

Docket No. 3765

**MOTION OF CAPE WIND ASSOCIATES  
FOR LEAVE TO INTERVENE**

Pursuant to Rules 1.13 the Rules of Practice and Procedure of the Commission and the Commission's December 4, 2006 Scheduling Memorandum, Cape Wind Associates, LLC ("CWA") hereby moves for leave to intervene in the above-referenced proceeding. In support thereof, CWA states the following:

**I. COMMUNICATIONS**

All communications, correspondence, and documents related to this proceeding should be directed to the following person:

Dennis J. Duffy, V.P.  
Energy Management, Inc.  
75 Arlington Street, Suite 704  
Boston, MA 02116  
Tel: (617) 904-3100  
Fax: (617) 904-3109  
E-Mail: dduffy@emienergy.com

**II. POSITION AND GROUNDS FOR INTERVENTION**

Cape Wind Associates, LLC is a Massachusetts limited liability company that is developing the nation's first offshore wind farm approximately five miles off the coast of

Massachusetts. The Cape Wind project would be capable of generating up to 420 mw of clean and renewable energy and would displace approximately 1 million tons of greenhouse gas emissions each year. Cape Wind has a unique potential to fulfill the stated statutory objectives of stimulating investment in related manufacturing, with the potential to catalyze hundreds of new jobs in Rhode Island. The filing in this proceeding could have a materially effect upon the regime's developing renewable energy industry, including the CWA project.

Cape Wind cannot be adequately represented by any other representative in the proceeding because no other entity has interests, or potential local benefits, comparable to those of Cape Wind. As set forth above, Cape Wind is engaged in the development of a major offshore wind facility that would provide a substantial portion of the renewable energy required to meet the requirements of the Rhode Island renewable energy standard ("RES") of Chapter 39-26. As such, Cape Wind has real and vested interests in the development of commercially viable renewable energy procurement standards to achieve the purposes of the RES.

Cape Wind is also uniquely familiar with the financing requirements of major renewable projects in Southern New England, and seeks to insure that renewable procedures have the opportunity to make sales, including long-term sales, on reasonable commercial terms, consistent with the Commission's Order of December 28, 2005 in Docket No. 3659, and the statutory goals of the RES.

CWA thus has a direct and substantial interest in this proceeding which cannot be adequately represented by other the party and it is the public interest to allow CWA to actively participate in this proceeding.

### **III. CONCLUSION**

WHEREFORE, for the above-stated reason, CWA respectfully requests that the Commission grant its requests for intervention in the above-referenced docket, with all rights associated therewith.

Respectfully Submitted,

Cape Wind Associates, LLC  
by: EMI Cape Wind, LLC



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Dennis J. Duffy, V.P.  
Energy Management, Inc.  
75 Arlington Street, Suite 704  
Boston, MA 02116  
(617) 904-3100  
(617) 904-3109 (fax)

Dated December 12, 2002

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated in the official service list compiled by the Secretary in this proceeding.

Dated at Boston, Massachusetts this 12<sup>th</sup> day of December 2006.



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