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April 1, 2008

**VIA OVERNIGHT DELIVERY &
ELECTRONIC MAIL**

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

**Re: RI Energy Efficiency and Resource Management Council's Proposed
Standards for Energy Efficiency and Conservation Procurement and
System Reliability
Docket No. 3931**

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 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". The signature is written in a cursive style.

Dennis J. Duffy

DJD/lrm
Enclosures

cc: Docket 3931 Service List

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

RI Energy Efficiency and Resource Management)
Council's Proposed Standards for Energy)
Efficiency and Conservation Procurement and)
System Reliability)
_____)

Docket No. 3931

**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 March 20, 2008 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 Rhode Island's stated statutory objectives of stimulating investment in renewable generation and procurement on a least cost basis. The filing in this proceeding could have a materially effect upon the regime's developing renewable energy industry, including the CWA project, and the purchase and sale of associated electricity.

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 energy procurement standards to under Rhode Island law.

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, and the applicable least cost procurement standards.

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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(617) 904-3100
(617) 904-3109 (fax)

Dated April 1, 2008

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 1st day of April 2008.



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