

Town of Portsmouth
Economic Development Committee
2200 East Main Road - Portsmouth, RI 02871 - 401-643-0328

Luly E. Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888
401-941-4500, ext. 107
401-941-8827 (fax)
Lmassaro@puc.state.ri.us

Re: Docket No.: 3999 (Qualifying Facilities Power Purchase Rate)

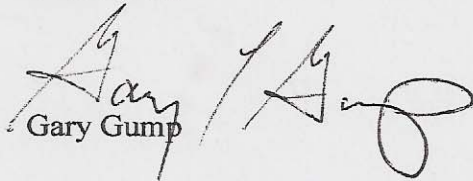
In Re: Town of Portsmouth application to increase number of Municipal accounts eligible for energy credit from Town renewable energy wind turbine generator.

MOTION TO REOPEN PROCEEDING FOR
THE LIMITED PURPOSE OF INCREASING
THE NUMBER OF INDIVIDUAL TOWN
MUNICIPAL ENERGY ACCOUNTS ELIGIBLE
FOR CREDIT FROM RENEWABLE ENERGY
RESOURCE

Ms Massaro,

Attached please find our motion to re-open the above-referenced docket pursuant to RI PUC Commission Rule 1.26. This motion (attached) is transmitted to your attention electronically and via US mail with original plus hard copies copy today.

Thank You,


Gary Gump

Chairman, PEDC Sustainable Energy Subcommittee

Cc: Docket 3999 service list
Portsmouth Town Solicitor
Portsmouth Town Administrator



Town of Portsmouth

2200 East Main Road • Portsmouth, Rhode Island 02871 • www.portsmouthri.com

State of Rhode Island and Providence Plantations Public Utilities commission

February 2, 2009

Docket No.: 3999 (Qualifying Facilities Power Purchase Rate)

In Re: Town of Portsmouth application to increase number of Municipal accounts eligible for energy credit from Town renewable energy wind turbine generator.

**MOTION TO REOPEN PROCEEDING FOR THE LIMITED
PURPOSE OF INCREASING THE NUMBER OF INDIVIDUAL
TOWN MUNICIPAL ENERGY ACCOUNTS ELIGIBLE FOR CREDIT
FROM RENEWABLE ENERGY RESOURCE**

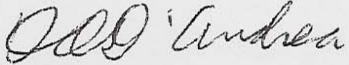
Pursuant to Commission Rule 1.26, the Town of Portsmouth (Town) hereby makes motion to reopen the above-referenced docket for the limited purpose of increasing the number of individual Town municipal energy accounts eligible for credit from Town renewable energy wind turbine generator to a minimum of 10 accounts

We believe good cause exists in support of this request in that at the time of the Docket 3999 hearing (Dec 17) the town was unable to immediately convert the impact of limiting credit to 5 accounts into our planning model that we rely on to create the financials supporting our specific town project. In the case of Portsmouth (after analysis of the limit of 5 accounts and using the 5 largest accounts), restricting the town to 5 accounts eliminates approximately 23% of current annual energy use from consideration which reduces the financial viability of this Portsmouth renewable energy project and will have similar impact in many other RI communities.

Briefly, the Town requested (in it's Dec 11, 2008 submission to the RIPUC - copy attached) that no limit be imposed on the number of Town energy accounts eligible for credit against the output of the Towns' renewable energy wind turbine generator. The rationale for this being that Portsmouth and most of the municipalities that have viable wind energy have 30 or more individual accounts that in total represent the demand against which to offset renewable energy production. The pending decision to limit the total number of municipal energy accounts to 5 significantly limits the amount of eligible municipal energy credit. Most of the towns and cities with a viable municipal wind site(s) have as a minimum 3 high use public facilities (Town hall, Fire dept and Police department) 4-6 high use school facilities (high school, middle school and 3-5 grade school buildings,) plus the town/city street light account which in total represent as much as 90 % of all municipal energy use. Allowing communities to apply credit to 10 accounts will insure that any community has full opportunity to consider renewable energy options. We believe that the Commission can better serve the goal of expanding renewable energy use in all RI communities by increasing this cap to cover a minimum of 10 of town accounts. (Note there are 27 town accounts (meters) and 14 School accounts (meters) in Portsmouth.

Because the hearings in this Docket have concluded, but a written order has not been issued, this Motion is proper under Rule 1.26. The Town of Portsmouth respectfully requests the Commission to reopen this proceeding for the purpose of increasing the number of eligible municipal energy accounts to accommodate the economic majority of municipal energy use.

Respectfully Submitted,



The Town of Portsmouth by Its Attorney:

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cc: R. Driscoll, Town Administrator
G. Gump, PEDC, Sustainable Energy Subcommittee