

# *Schacht & McElroy*

*Robert M. Schacht  
Michael R. McElroy*

*Members of Rhode Island  
and Massachusetts Bars*

*Attorneys at Law*

*21 Dryden Lane  
Post Office Box 6721  
Providence, Rhode Island 02940-6721*

*(401) 351-4100  
fax (401) 421-5696*

*email: RMSchacht@aol.com  
McElroyMik@aol.com*

December 8, 2008

Luly Massaro, Clerk  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

Re: National Grid 2009 Renewable Energy Procurement Plan – Docket No. 4012

Dear Luly:

As you know, this office represents Bluewater Wind. Please accept this letter and file it in this docket as Bluewater Wind's comments. An original and nine copies of this letter are enclosed.

First, Bluewater Wind agrees with, supports in its entirety, and adopts the "Statement of Conservation Law Foundation in response to National Grid's Renewable Energy Procurement Plan for 2009" filed in this docket on or about December 5, 2008.

Second, Bluewater Wind also believes, together with the Conservation Law Foundation, that applicable law requires National Grid to procure at least a sizeable portion of its renewable energy pursuant to Rhode Island's Renewable Energy Standard, R.I.G.L. § 39-26-1 et seq., in the form of long term contracts.

Third, Bluewater Wind agrees with this Commission, as stated in the Commission's Order dated December 20, 2007, in Docket 3901 that the "Commission still believes that long term contracts will be necessary for the success of the renewable energy supply." (at 19).

Fourth, Bluewater Wind respectfully incorporates by reference the following testimony of Erich Stephens, the Rhode Island Project Director for Bluewater Wind, filed in the following referenced dockets and asks the Commission to take administrative notice of this testimony: (a) the testimony of Erich Stephens filed in Docket No. 3765 on or about January 17, 2007, (b) the surrebuttal testimony of Erich Stephens filed in Docket No. 3765 on or about February 19, 2007, and (c) the testimony of Erich Stephens filed in Docket 3901 on or about December 12, 2007.

Luly Massaro, Clerk  
December 8, 2008  
Page 2

However, Bluewater Wind expects that National Grid will undertake long term contracts for renewable energy in compliance with R.I.G.L. § 39-26-1 et seq. by the time this Commission rules in 2009 on the extension of National Grid's standard offer service.

Therefore, although Bluewater Wind believes that the applicable law requires long term contracts as part of the procurement plan in this docket, Bluewater Wind does not object to National Grid's plan in this docket as submitted.

If you have any questions, please feel free to call.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael R. McElroy", with a stylized flourish at the end.

Michael R. McElroy

MRMc:tmg  
cc: Service List