

October 28, 2009

Via Hand Delivery and Electronic Mail

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

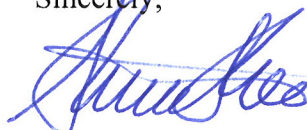
Re: Docket 4111; Motion to Intervene

Dear Luly:

On behalf of the Rhode Island Economic Development Corporation attached is an original and nine copies of Motion to Intervene of the Rhode Island Economic Development Corporation.

Please let me know if you have any questions in regards to these documents

Sincerely,



Alan M. Shoer, #3248

Enclosures

cc: Service List

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**BEFORE THE
RHODE ISLAND PUBLIC UTILITIES COMMISSION**

**IN RE: NATIONAL GRID – REVIEW OF)
PROPOSED TOWN OF NEW SHOREHAM) Docket No. 4111
PROJECT PURSUANT TO R.I. GEN. LAWS)
§ 39-26.1-1)**

**MOTION TO INTERVENE
OF THE RHODE ISLAND ECONOMIC DEVELOPMENT CORPORATION**

Now comes the Rhode Island Economic Development Corporation by and through its counsel, and pursuant to Rule 1.13 of the Commission’s Rules of Practice and Procedure, hereby moves that it be allowed to intervene as a participant in this docket.

The Commission’s Rules of Practice and Procedure provides that intervention is appropriate where an entity has an interest in the outcome of the proceeding such that intervention is necessary or appropriate to ensure that the party’s interest is protected. The interest of a party may be direct – where the intervenor may be directly impacted by the decision of the Commission, or where the intervenor’s participation will be in the public interest or may assist the Commission.

The specific subject matter of this docket concerns a proposed long term renewable energy contract submitted by National Grid, for the renewable energy project designated for the Town of New Shoreham or Block Island, as more fully set forth in R.I. Gen. Laws § 39-26.1-7. The statute is designed as the first step in carrying out the responsibilities of this new Chapter of the General Laws “to encourage and facilitate the creation of commercially reasonable long-term contracts between electric distribution companies and developers or sponsors of newly developed renewable energy resources with the goals of stabilizing long-term energy prices, enhancing environmental quality, creating jobs in Rhode Island in the renewable energy sector, and facilitating the financing of renewable energy generation within the jurisdictional boundaries of the state or adjacent state or federal waters or providing direct economic benefit to the state.” R.I. Gen. Laws § 39-26.1-1.

With regard to the New Shoreham project that is the subject of this proceeding, the power purchase agreement must be enacted “to enhance the electric reliability and environmental quality of the Town of New Shoreham.” R.I. Gen. Laws § 39-26.1-7.

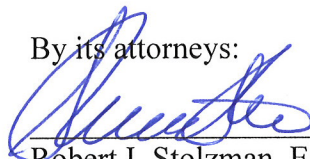
The Rhode Island Economic Development Corporation is a quasi-public corporation and public instrumentality of the State of Rhode Island formed pursuant to R.I. General Laws Title 42, Chapter 64 with the following interests directly affected by the decisions of the Commission in this matter: (a) the Rhode Island Economic Development Corporation is formed to foster economic growth, avoid and diminish unemployment and underemployment in the State, and to implement economic development projects in Rhode Island, and the public interest in long term renewable energy resources being developed in Rhode Island will directly create jobs in Rhode Island and indirectly improve the local, state and regional economies; (b) the Rhode Island Economic Development Corporation’s subsidiary corporation, the Quonset Development Corporation, formed pursuant to R.I. General Laws Title 42, Chapter 64.10, has entered into a lease and development agreement with Deepwater Wind, the respondent to National Grid’s request for proposals for the New Shoreham project, to develop, stage and deploy resources at its Quonset facilities in support of the New Shoreham project set forth in R.I. Gen. Laws Sec. 39-26.1-7; and (c) the Rhode Island Economic Development Corporation implements and oversees the Rhode Island Renewable Energy Development Fund pursuant to R.I. Gen. Laws Sections 42-64-13.2 and 39-2-1.2 with the express statutory mandate to secure for Rhode Island the benefits of renewable energy development from diverse sources, and as such has invested substantial assets toward the development of a Special Area Management Plan by the Rhode Island Coastal Management Resources Corporation for the coastal waters of Rhode Island for a variety of ocean uses, including but not limited to the New Shoreham project.

Accordingly, the Rhode Island Economic Development Corporation has a special interest in the outcome of this proceeding. While the Rhode Island Economic Development Corporation does not intend to advocate with regard to what price is deemed a “commercially reasonable” price, as that term is used in the statute, the Rhode Island Economic Development Corporation does have a special interest in the terms and implementation of the contract, including its expeditious execution, to support the agency’s mission to develop the so-called green economy, to develop renewable energy resources in Rhode Island, fulfill the terms of the agreements to utilize the Quonset site for development of off-shore power resources and to fulfill the mandate of the Renewable Energy Development Fund, all of which are best presented to the Commission by the Rhode Island Economic Development Corporation.

WHEREFORE, for the reasons described above, the Rhode Island Economic Development Corporation meets the Commission’s standards for intervention under Rule 1.13. The Rhode Island Economic Development Corporation respectfully requests that the Commission grant this request.

**RHODE ISLAND ECONOMIC
DEVELOPMENT CORPORATION**

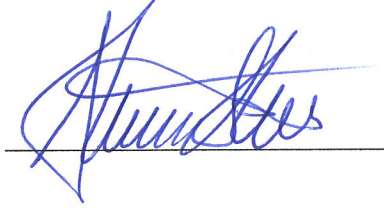
By its attorneys:



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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of October 2009 I sent a true copy of the foregoing to the service list provided in this docket.



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