

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: REVIEW OF PROPOSED :  
TOWN OF NEW SHOREHAM PROJECT : DOCKET NO. 4111  
PURSUANT TO R.I. GEN. LAWS § 39-26.1-7 :

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**MOTION TO INTERVENE OF THE RHODE ISLAND BUILDING AND  
CONSTRUCTION TRADES COUNCIL**

**I. Introduction**

Now comes the Rhode Island Building and Construction Trades Council ("RIBCTC") pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission Rules of Practice and Procedure and hereby moves for permission to intervene in the above-captioned docket. As grounds therefore and in support thereof, RIBCTC avers that it has an interest in the proceeding, which is of such a nature that intervention is necessary and appropriate and is not otherwise adequately represented, and that its participation in this docket is in the public interest. In further support thereof, RIBCTC sets forth herein below the grounds for its proposed intervention and its position in this proceeding.

**II. Basis for Intervention**

**A. Intervenor**

The RIBCTC is a voluntary federation of seventeen (17) local unions dedicated to improving the lives of working men and women in the construction industry by assisting them in finding good quality jobs that provide fairness and dignity in the workplace and securing social equity. *The members of the council have been involved in every major construction initiative—private or public—undertaken in and around the State of Rhode Island in the last seventy (70) years.* Cumulatively, the individual unions represent approximately 10,000 active and retired workers in and around the Rhode Island area. RIBCTC'S principal office is located

at 410 South Main Street, Providence, RI 02903.<sup>1</sup>

**B. Interest and Position**

The within docket involves review of a filing by National Grid relative to the Town of New Shoreham Project pursuant to R.I.G.L. §39-26.1-7. That filing arises out of R.I.G.L. §39-26.1-1, *et seq.* entitled “Long-Term Contracting Standard for Renewable Energy” (“the Act”). Prior to enacting the foregoing legislation, the State of Rhode Island executed a Joint Development Agreement with Deepwater Wind Block Island, LLC (“Deepwater”), whereby Deepwater was designated the State's preferred developer of two offshore wind power projects. The Town of New Shoreham project which is the subject of this docket is one of those.

The purpose of the Act is “[t]o 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 . . .” The goals of the Act include *“creating jobs in Rhode Island in the renewable energy sector and . . . providing direct economic benefit to the state.”*

The RIBCTC has both a strong and unique interest in supporting and facilitating the consummation of an agreement between Deepwater and National Grid to permit construction of an offshore wind power project for the Town of New Shoreham. That interest is the creation of jobs in the renewable energy sector, both short and long term, in the fabrication, construction, and maintenance and repair of renewable energy facilities. *Many if not most of the foregoing jobs created by this project will be performed by members of RIBCTC's various federated local*

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<sup>1</sup> In addition to nearly 10,000.00 active and retired members, RIBCTC member unions have the ability to draw upon a regional workforce in excess of 37,000. RIBCTC member unions include Boilermakers Local No.29, Bricklayers Local No. 1, Carpenters Local No. 94, Elevator Workers Local No. 39, Glaziers Local No. 1333, Heat & Frost Insulators Local No. 6, IBEW Local No.99, Iron Workers Local No. 37, Laborers' District Council, Plasterers & Cement Masons No. 40, Operating Engineers Local No.57, Painters Local No. 195, Plumbers & Pipefitters Local No. 51, Roofers & Waterproofers Local No. 33, Sheet metal Workers Local No. 17, Sprinkler Fitters Local No. 676, and Teamsters Local No. 251.

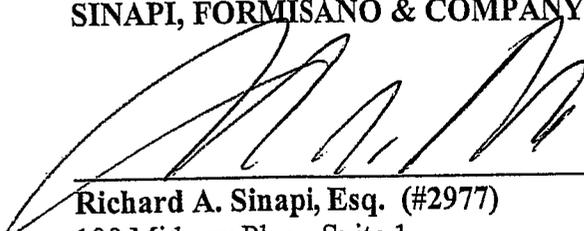
*unions.* In addition, the workers represented by RIBCTC's member unions have specialized knowledge, background and experience in the construction of similar major and complex projects. Expeditious consummation of an agreement and commencement of this project could propel this state to the forefront of the emerging renewable energy industry and provide an enormous long-term economic benefit to this state. In short, the labor of workers represented by RIBCTC's member unions is essential to the construction of this project, while this project is in turn crucial to the creation of jobs and livelihood of those workers. Accordingly, RIBCTC's qualification as a legitimate stakeholder in this docket cannot be disputed.

### **III. Conclusion**

**WHEREFORE,** for all the reasons set forth above, RIBCTC respectfully prays that its Motion to Intervene be granted and that it be permitted to intervene in the above-captioned docket accordingly.

**Rhode Island Building and Construction Trades  
Council,  
By its attorneys,  
SINAPI, FORMISANO & COMPANY, LTD.**

**Dated: October 28, 2009**



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**Richard A. Sinapi, Esq. (#2977)**  
100 Midway Place, Suite 1  
Cranston, RI 02920  
Phone: (401) 944-9690; FAX: (401) 943-9040  
Email: [dicks@sfclaw.com](mailto:dicks@sfclaw.com)

**CERTIFICATION**

I hereby certify that on the 28<sup>th</sup> day of October, 2009 a copy of the foregoing document was caused to be served upon the individuals on the below service list.



~~Review of Proposed Town of New Shoreham Project Docket No. 4111 Service~~  
List Updated 10/28/09

Name/Address	E-mail Distribution	Phone/FAX
Thomas R. Teehan, Esq. National Grid. 280 Melrose St. Providence, RI 02907	<a href="mailto:Thomas.teehan@us.ngrid.com">Thomas.teehan@us.ngrid.com</a>	401-784-7667 401-784-4321
	<a href="mailto:Joanne.scanlon@us.ngrid.com">Joanne.scanlon@us.ngrid.com</a>	
Ronald T. Gerwatowski, Esq. National Grid 40 Sylvan Rd. Waltham, MA 02451	<a href="mailto:Ronald.gerwatowski@us.ngrid.com">Ronald.gerwatowski@us.ngrid.com</a>	
Joseph A. Keough, Jr., Esq. Keough & Sweeney 100 Armistice Blvd. Pawtucket, RI 02860	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a>	401-724-0600
Michael McElroy, Esq. Schacht & McElroy; PO Box 6721 Providence RI 02940-6721	<a href="mailto:McElroyMik@aol.com">McElroyMik@aol.com</a>	401-351-4100 401-421-5696
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:lwold@riag.ri.gov">lwold@riag.ri.gov</a>	401-222-2424
	<a href="mailto:Steve.scialabba@ripuc.state.ri.us">Steve.scialabba@ripuc.state.ri.us</a>	401-222-3016
	<a href="mailto:Al.contente@ripuc.state.ri.us">Al.contente@ripuc.state.ri.us</a>	
Jon Hagopian, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:jhagopian@riag.ri.gov">jhagopian@riag.ri.gov</a>	
	<a href="mailto:Dmacrae@riag.ri.gov">Dmacrae@riag.ri.gov</a>	
	<a href="mailto:Mtobin@riag.ri.gov">Mtobin@riag.ri.gov</a>	
Original & nine (9) copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02889	<a href="mailto:Lmassaro@puc.state.ri.us">Lmassaro@puc.state.ri.us</a>	401-780-2017
	<a href="mailto:Cwilson@puc.state.ri.us">Cwilson@puc.state.ri.us</a>	401-941-1691
	<a href="mailto:Nucci@puc.state.ri.us">Nucci@puc.state.ri.us</a>	
	<a href="mailto:Anault@puc.state.ri.us">Anault@puc.state.ri.us</a>	
Matt Auten Office of Lt. Governor 116 State House Providence, RI 02903	<a href="mailto:Sccamara@puc.state.ri.us">Sccamara@puc.state.ri.us</a>	
	<a href="mailto:mautengl@gov.state.ri.us">mautengl@gov.state.ri.us</a>	

Jerry Elmer, Staff Attorney Conservation Law Foundation 55 Dorrance Street Providence RI 02903	<a href="mailto:JElmer@clf.org">JElmer@clf.org</a>	401-351-1102
Alan D. Mandl, Esq. Smith & Duggan, LLP Lincoln North <del>55 Old Bedford Road</del> Lincoln, MA 01773	<a href="mailto:amandl@smithduggan.com">amandl@smithduggan.com</a>	617-228-4464 781-259-1112
Richard A. Sinapi, Esq. Sinapi, Formisano & Company, Ltd. 100 Midway Place, Suite 1 Cranston, RI 02920	<a href="mailto:dicks@sfclaw.com">dicks@sfclaw.com</a>	401-944-9690 401-943-9040