Schacht & McElroy

Robert M. Schacht Michael R. McElrov

Members of Rhode Island and Massachusetts Bars Attorneys at Law

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

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

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

March 22, 2010

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

Re:

Long Term Contracts for Renewable Energy Projects Pursuant to R.I.G.L. § 39-26.1 et seq. – Docket No. 4150

Dear Luly:

This office represents Constellation Energy Commodities Group, Inc. ("CCG") and Constellation NewEnergy, Inc. ("CNE") (collectively, "Constellation") in the above docketed proceeding.

Enclosed are an original and nine copies of Constellation's Motion to Intervene.

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

Very truly yours,

Michael R. McElroy

MRMc/tmg

cc: Se

Service List

Constellation//4149/Massaro

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

IN RE: LONG TERM CONTRACTS FOR

RENEWABLE ENERGY PROJECTS

Docket No. 4150

PURSUANT TO R.I.G.L. § 39-26.1 et seq.

MOTION TO INTERVENE OF CONSTELLATION ENERGY COMMODITIES GROUP, INC., AND CONSTELLATION NEWENERGY, INC.

Pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission's ("Commission") Rules of Practice and Procedure, and the Commission's procedural schedule, Constellation Energy Commodities Group, Inc. ("CCG") and Constellation NewEnergy, Inc. ("CNE"), both collectively referred to herein as "Constellation," respectfully move to intervene as a full party in the above captioned proceeding, Docket 4150. In support of this Motion to Intervene, Constellation states as follows:

- 1. Constellation is a wholesale supplier of electric power to many of New England's electric utilities in connection with either their default or standard offer service obligations. In particular, CCG is a regular participant in default and standard offer service power supply solicitations, including those related to the Narragansett Electric Company d/b/a National Grid ("NEC"). In the past, CCG has been a successful bidder in NEC solicitations, and has an interest in potentially bidding for future standard offer service and renewable energy procurement.
- 2. CNE is a leading competitive supplier of electricity in the United States and is an electric retail supplier in 17 states, including Rhode Island, and two Canadian provinces.
- 3. CNE and CCG are subsidiaries of Constellation Energy Group, Inc., a North American energy company headquartered in Baltimore, Maryland which also owns Baltimore Gas and Electric Company, a regulated utility.

4. Service of any correspondence or pleadings in connection with this proceeding should be directed to:

Michael R. McElroy, Esq.
Schacht & McElroy
21 Dryden Lane
P.O. Box 6721
Providence, RI 02940-6721
(401) 351-4100
(401) 421-5696 (fax)
Michael@McElroyLawOffice.com

Timothy Daniels
Vice President – Energy Policy
Constellation NewEnergy, Inc.
810 Seventh Avenue, Suite 400
New York, NY 10019
(212) 885-6454
(212) 883-5888 (fax)
Timothy.daniels@constellation.com

Joseph E. Donovan, Esq.
Senior Counsel
Constellation Energy Resources, LLC
111 Market Place, Suite 500C
Baltimore, MD 21202
(410) 470-3582
(410) 470-2600 (fax)
Joseph.donovan@constellation.com

Daniel Allegretti
Vice President
Energy Policy
Constellation Energy Commodities
111 Market Place, Suite 500
Baltimore, MD 21202
(603) 224-9653
Daniel.W.Allegretti@constellation.com

- 5. Rule 1.13(b) of the Commission's Rules provides that "any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission."
- 6. Rule 1.13(b)(2) explains that intervention is necessary or appropriate for a person when, for example, such person has "[a]n interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding."
- 7. As an active wholesale supplier of electric power to many of New England's electric utilities, including NEC here in Rhode Island, and as a competitive electric supplier in Rhode Island, Constellation has unique interests in this proceeding that cannot be adequately represented by another party. As a result, Constellation has interests that may be directly affected by the outcome of this proceeding. Furthermore, Constellation's intervention and

participation is in the public interest. Therefore, Constellation should be permitted to intervene and participate in these proceedings.

8. Counsel for the Division of Public Utilities and Carriers and for National Grid have stated that they have no objection to Constellation's intervention.

Wherefore, Constellation requests that the Commission grant this Motion to Intervene, and designate CCG and CNE as full parties to this proceeding with all the rights appropriate to that status.

Respectfully submitted,

Constellation Energy Commodities Group, Inc.

and Constellation NewEnergy, Inc.

By their attorney

Dated: March 22, 2010

Michael R. McElroy, Esq. #2627,

Schacht & McElroy

21 Dryden Lane

P.O. Box 6721

Providence, RI 02940-6721

Tel: (40 Fax: (40

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

E-mail: Michael @McElroy Law Office.com

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of March, 2010, I served a true copy of the foregoing on the service list.

Thursa M. Gallo
Theresa M. Gallo

Constellation/4150/MotiontoIntervene

Docket No. 4150 National Grid – Long-Term Contracting for Renewable Energy Projects Pursuant to R.I.G.L. Section 39-26.1 et seq. Service List updated 3/19/10

Name/Address	E-mail Distribution	Phone/FAX
Thomas R. Teehan, Esq.	Thomas.teehan@us.ngrid.com	401-784-7667
National Grid.		401-784-4321
280 Melrose St.	Joanne.scanlon@us.ngrid.com	
Providence, RI 02907		
Leo Wold, Esq.	Lwold@riag.ri.gov	401-222-2424
Dept. of Attorney General	Dstearns@ripuc.state.ri.us	401-222-3016
150 South Main St.	Sscialabba@ripuc.state.ri.us	
Providence, RI 02903	Mtobin@riag.ri.gov	
	dmacrae@riag.ri.gov	
Michael McElroy, Esq.	McElroyMik@aol.com	401-351-4100
Schacht & McElroy	Timothy.daniels@constellation.com	401-421-5696
PO Box 6721	Daniel.W.Allegretti@constellation.com	
Providence RI 02940-6721	Joseph.Donovan@constellation.com	
File an original & nine (9) copies	Lmassaro@puc.state.ri.us	401-780-2017
w/:	Cwilson@puc.state.ri.us	401-941-1691
Luly E. Massaro, Commission Clerk	Nucci@puc.state.ri.us	
Public Utilities Commission	Anault@puc.state.ri.us	
89 Jefferson Blvd.		
Warwick, RI 02888		