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July 16, 2010

*Via Electronic and Regular Mail*

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

RECEIVED  
2010 JUL 19 PM 12:44  
PUBLIC UTILITIES COMMISSION

**Re: In re Review of Proposed Town of New Shoreham Project Pursuant to  
R.I. Gen. Laws § 39-26.1-7 – Docket No. 4185**

Dear Ms. Massaro:

Enclosed for filing on behalf of The Narragansett Electric Company d/b/a National Grid and Deepwater Wind Block Island, LLC is an original and twelve copies of a Motion for an Extension of Time.

Very truly yours,



David M. Marquez

DMM:jjm

Enclosures

cc: Docket No. 4185 Service List (electronically only)

1064748 (57972-144485)

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION

In re Review of Proposed Town of )  
New Shoreham Project Pursuant to )  
R.I. Gen. Laws § 39-26.1-7 )

Docket No. 4185

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2010 JUL 19 PM 12:41  
PUBLIC UTILITIES COMMISSION

**THE NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL GRID AND  
DEEPWATER WIND BLOCK ISLAND, LLC'S  
MOTION FOR AN EXTENSION OF TIME**

Pursuant to Commission Rule 1.6(b), The Narragansett Electric Company d/b/a National Grid ("National Grid") and Deepwater Wind Block Island, LLC ("Deepwater Wind") (collectively, "Applicants") hereby request an extension of time, up to and including Friday, July 23, 2010, within which to file their opposition to TransCanada Power Marketing Ltd.'s ("TransCanada") Motion to Dismiss. The Applicants' opposition presently is due by 4:00 p.m. on Monday, July 19, 2010. TransCanada conditionally consents to this request, as set forth below. In support of this motion, the Applicants state as follows:

1. On June 30, 2010, National Grid commenced this proceeding by filing, pursuant to Rhode Island's Long-Term Contracting Statute, R.I. Gen. Laws §§ 39-26.1-1 through 26.1-8, an Amended Power Purchase Agreement ("Amended PPA") for the purchase of renewable energy produced by a wind energy demonstration project that Deepwater Wind intends to construct off the coast of Block Island.

2. In order to expedite its consideration of the Amended PPA, the Commission set a compressed procedural schedule allowing until July 19, 2010 for parties to respond to dispositive motions.

3. On July 13, 2010, TransCanada filed a motion to dismiss this proceeding on the ground that the Long-Term Contracting Statute, on which this proceeding is based, violates Art. I § 8 of the U.S. Constitution, otherwise known as the Commerce Clause.

4. The Applicants are already engaged in responding to the voluminous arguments and challenges raised by the Conservation Law Foundation and the Attorney General, and those responses are due on July 19, 2010, as well as responding to data requests from various parties to the proceeding. The Applicants need additional time to respond to TransCanada's Commerce Clause challenge, and cannot reasonably complete their opposition papers before July 23, 2010.

5. Pursuant to Commission Rule 1.6(b), the Commission may extend a deadline for "good cause."

6. Extending the response deadline to Friday, July 23, 2010 will provide the Applicants and other interested parties with the time necessary to respond to TransCanada's motion. No party will be prejudiced by the extension, because the Commission's procedural schedule otherwise will otherwise remain unchanged. If the Commission chooses to permit oral argument on TransCanada's motion, then the Commission can set a date during the following week, or thereafter. Good cause exists for the requested extension.

7. The Applicants have confirmed that TransCanada consents to this requested extension of time provided that the oral argument, if any, on TransCanada's motion to dismiss is extended to July 28, 29, or 30. If necessary, counsel for TransCanada can appear for argument on July 27.

WHEREFORE, The Narragansett Electric Company d/b/a National Grid and Deepwater Wind Block Island, LLC respectfully request an extension of time, up to and including Friday,

July 23, 2010, within which to file their opposition to TransCanada Power Marketing Ltd.'s  
Motion to Dismiss.

Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a NATIONAL GRID and DEEPWATER  
WIND BLOCK ISLAND, LLC

By their Attorneys,



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DATED: July 16, 2010

**CERTIFICATION**

I hereby certify that an original and twelve copies of the within were sent via U.S. Mail to the Commission Clerk, Public Utilities Commission, 99 Jefferson Boulevard, Warwick, Rhode Island 02888. In addition, electronic copies were transmitted by e-mail to all persons on the below service list. I hereby certify that all of the foregoing was done on July 16, 2010.



**National Grid – Review of Proposed Town of New Shoreham Project  
Docket No. 4185 – Service List Updated 7/15/10**

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