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July 2, 2010

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

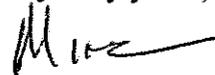
Re: Docket No. 4185

Dear Luly:

Enclosed are an original and twelve copies of a Petition to Intervene as a full party on behalf of Polytop Corporation.

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

Very truly yours,



Michael R. McElroy

MRMc:tmg
cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: REVIEW OF AMENDED POWER :
PURCHASE AGREEMENT BETWEEN :
NARRAGANSETT ELECTRIC COMPANY : Docket No. 4185
d/b/a NATIONAL GRID AND :
DEEPWATER WIND BLOCK ISLAND, LLC :
PURSUANT TO R.I.G.L. § 39-26.1-7 :

PETITION TO INTERVENE OF POLYTOP CORPORATION.

Pursuant to Rule 1.13, and the Notice of Filing, Intervention Deadline, Preliminary Procedural Schedule, Administrative Notice, and Standards for Filings issued by the Rhode Island Public Utilities Commission (Commission) in the above captioned docket on June 24, 2010, Polytop Corporation (Polytop) hereby petitions to intervene as a full party in the above-entitled docket and states as follows:

1. Polytop is a manufacturer of plastic dispensing closures for many different industry applications.

2. Polytop is located in North Smithfield.

3. Polytop employs approximately 200 people in Rhode Island.

4. Polytop spends approximately \$10 million annually in payroll in Rhode Island.

5. Polytop is one of the largest users of electricity in Rhode Island.

6. Polytop's interests will be directly affected by the above docket, and Polytop's interests will not be adequately represented by the existing parties.

7. Polytop uses about 17 million kWh of electricity per year. It is estimated that the annual electric distribution rate increase that will be imposed upon Polytop under the proposed amended Purchase Power Agreement (PPA) will be approximately \$42,000 per year, increasing at the rate of 3.5% per year. This would result in Polytop paying over \$880,000 of the cost of the

Town of New Shoreham offshore wind project at issue in this docket over the 20-year term of the proposed PPA.

8. Other large commercial and industrial users similarly situated to Polytop will be similarly adversely impacted by this matter.

9. Pursuant to R.I.G.L. § 39-26.1-7(c), the PUC must review the PPA to determine, among other things, (1) if the PPA contains terms and conditions that are commercially reasonable, (2) if the PPA is likely to provide economic development benefits, including (a) facilitating new and existing business expansion, (b) the creation of new renewable energy jobs, and (c) further development of Quonset Business Park, and (3) if the PPA is likely to provide environmental benefits, including the reduction of carbon emissions.

10. It is Polytop's position (a) that the large increased costs that would be imposed upon Polytop renders the PPA commercially unreasonable; (b) that the PPA is not likely to provide economic development benefits, but in fact will result in economic development detriments; (c) that the PPA will not facilitate new and existing business expansion, but in fact will discourage new and existing business expansion; (d) that the PPA will not further the development of Quonset Business Park, but in fact will discourage further development of Quonset Business Park; and (e) that although the project may provide some small environmental benefits, those benefits would come at unacceptably high cost.

11. Therefore, Polytop respectfully submits that the PUC should reject the PPA as not in compliance with R.I.G.L. § 39-26.1-7.

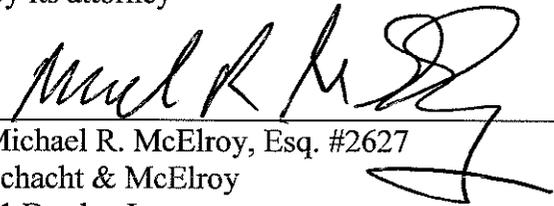
12. Polytop expects to sponsor a witness.

13. Polytop petitions for full party intervenor status in this docket in order to fully participate in the hearings and discussions regarding all matters pertaining to this docket. All

correspondence to Polytop should be addressed as follows: (1) Michael R. McElroy, Esq., Schacht & McElroy, 21 Dryden Lane, P.O. Box 6721, Providence, RI 02940-6721, phone (401) 351-4100; fax (401) 421-5696; email Michael@McElroyLawOffice.com and (2) Mr. Kevin Rowles and Mr. Tom D'Amato, Polytop Corporation, 110 Graham Drive, P.O. Box 68, Slatersville, RI 02876; phone (401) 767-2400; fax (401) 765-2694; e-mail KRowles@Polytop.com and TDamato@Polytop.com.

WHEREFORE Polytop Corporation respectfully requests that this petition to intervene as a full party be granted.

Respectfully submitted,
POLYTOP CORPORATION
By its attorney



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Date: July 2, 2010

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of July, 2010, I sent a true copy of the foregoing to the attached service list.



Michael R. McElroy

**National Grid – Review of Proposed Town of New Shoreham Project
Docket No. 4111 – Service List Updated 6/30/10**

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