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July 2, 2010

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

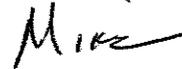
Re: Docket No. 4185

Dear Luly:

Enclosed are an original and twelve copies of a Petition to Intervene as a full party on behalf of Toray Plastics (America, Inc.)

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 TORAY PLASTICS (AMERICA), INC.

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, Toray Plastics (America), Inc., (Toray) hereby petitions to intervene as a full party in the above-entitled docket and states as follows:

1. Toray is a manufacturer of high technology thin polyester film and polypropylene film for many different industry applications.
2. Toray is located in Quonset Business Park. Toray employs approximately 600 people in Rhode Island. Toray's plants operate 24 hours a day, 7 days a week.
3. Toray has invested approximately \$750 million in North Kingstown since 1985.
4. Toray spends approximately \$76 million annually in payroll and purchasing costs in Rhode Island.
5. Toray's parent company, Toray Industries, Inc., is the number one polyester film manufacturer in the world.
6. Toray is one of the largest users of electricity in the State of Rhode Island.
7. Toray's interests will be directly affected by the above docket, and Toray's interests will not be adequately represented by the existing parties.

8. Toray uses about 160 million kWh of electricity per year, of which about 50 million kWh is generated by Toray, and about 110 million kWh is purchased by Toray.

9. It is estimated that the annual electric distribution rate increase that will be imposed upon Toray under the proposed amended Purchase Power Agreement (PPA) will be approximately \$287,000 per year, increasing at the rate of 3.5% per year.

10. This would result in Toray paying approximately \$7.4 million 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.

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

12. 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.

13. It is Toray's position (a) that the dramatic costs that would be imposed upon Toray and others similarly situated 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 where Toray is located, but in fact will discourage further development of Quonset Business Park; and (e) that although the PPA agreement may

provide some small environmental benefits, those benefits would come at unacceptably high cost.

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

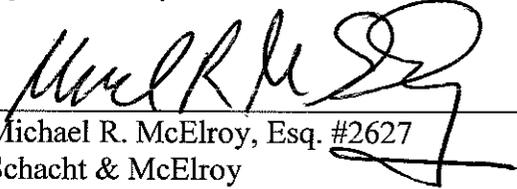
15. Toray expects to sponsor a witness.

16. Toray 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 Toray 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. Shigeru Osada, Senior Vice President, Toray Plastics (America), Inc., 50 Belver Avenue, North Kingstown, RI 02852-7520; phone (401) 667-4504; fax (401) 294-1638; email Shigeru.Osada@TorayTPA.com.

WHEREFORE Toray Plastics (America) Inc. respectfully requests that this petition to intervene as a full party be granted.

Respectfully submitted,
TORAY PLASTICS (AMERICA), INC.
By its attorney

Date: July 2, 2010



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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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