

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
THE RHODE ISLAND 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. Gen. Laws § 39-26.1-7 :

**Motion of TransCanada Power Marketing Ltd. to Intervene**

Pursuant to Rule 1.13 of the Rhode Island Public Utilities Commissions Rules of Practice and Procedure, TransCanada Power Marketing Ltd. (“TCPM”) hereby moves that the Commission grant to TCPM the right to intervene as a party in the above captioned proceeding for the reasons set forth herein.

TCPM is a power marketing company with its principal address at 110 Turnpike Road, Suite 203, Westborough, Massachusetts. TCPM’s corporate parent and sister companies generate power in various locations, including Maine, New Hampshire, Vermont, Rhode Island, New York, Arizona and Canada. In particular, TransCanada Maine Wind Development Inc. has developed the Kibby Wind Farm in Maine, which is capable of providing a significant volume of renewable energy to Rhode Island. TCPM wishes to compete for long-term contracts to provide this renewable energy to Rhode Island electric distribution companies, pursuant to R.I. Gen. Laws §§ 39-26.1-1 et seq.

The Commission opened this Docket to review, pursuant to § 39-26.1-7, the proposal of National Grid for approval of the long-term amended power purchase agreement between National Grid and Deepwater Wind Block Island, LLC. In this Docket the Commission will determine whether such agreement meets the conditions set forth in said Section, as recently revised by the Rhode Island General Assembly.

TCPM’s participation in this proceeding will assist the Commission in determining whether the subject agreement is a cost-effective and commercially reasonable mechanism for producing renewable energy on a long-term basis. TCPM has knowledge and expertise in the area of renewable energy generation and can definitely attest to its own costs and ability to enter into long-term contracts. TCPM’s participation will also assist the Commission in developing a comprehensive record and otherwise resolving issues in this Docket.

Consistent with the Notice of Filing, Intervention Deadline, Preliminary Procedural Schedule, Administrative Notice and Standards for Filings, TCPM hereby requests that it be permitted to intervene as a party in order to adequately represent and protect its interest. TCPM is substantially and specifically affected by this proceeding, because Deepwater Wind Block Island, LLC and TCPM are competitors for the supply of renewable energy to electric distribution companies in Rhode Island and because Sections 39-26.1-1 et seq. provides for a limited number of long-term contract opportunities. If approved, the subject agreement will substantially and significantly affect the prospects of TCPM for entering into contracts pursuant to Sections 39-26.1-1 et seq.

Based on the foregoing, TCPM has a direct and substantial interest in the Commission's review of the subject agreement and will be directly affected by the outcome of this proceeding. TCPM's interest in this matter is not the same as the interest of any other party, and TCPM's interest in this matter cannot be adequately represented or addressed by any other party. In view of TCPM's interest in this matter, the grant by the Commission of the within Motion to Intervene and the designation of TCPM as a party of this proceeding are in the public interest.

Therefore, TCPM requests that the within Motion to Intervene be granted and that TCPM be granted status as a party in this proceeding.

Dated: June 6, 2010

Respectfully submitted,

TransCanada Power Marketing Ltd.

By its attorneys,



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CERTIFICATE OF SERVICE

I hereby certify that on the 6<sup>th</sup> day of July, 2010, a true and correct copy of the within Motion to Intervene was e-mailed to those persons indicated on the attached Service List.

Richard A. Skum

**National Grid – Review of Proposed Town of New Shoreham Project  
Docket No. 4111 – Service List Updated 7/6/10**

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