

July 8, 2010

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4185 - Review of Amended Power Purchase Agreement Between Narragansett Electric Company d/b/a National Grid and Deepwater Wind Block Island, LLC Pursuant to R.I. Gen. Laws § 39-26.1-7
Support for Deepwater Wind Block Island, LLC's Objections to Certain Motions to Intervene

Dear Ms. Massaro:

National Grid¹ submits this letter in support of Deepwater Wind Block Island, LLC's ("Deepwater") Objections to the Motions to Intervene of Thomas Doyle, Patricia Doyle, James E. O'Neil, Rosemary Ives, Jonathan Ives, Michael Beauregard and Lawrence Ehrhardt (collectively, the "Citizen Interveners"), Polytop Corporation ("Polytop"), Toray Plastics (America), Inc. ("Toray"), TransCanada Power Marketing ("TransCanada") and Ocean State Policy Research Institute and the Founder's Project ("OSPRI"). National Grid agrees with the arguments stated in Deepwater's Objections and believes that those arguments are sufficient grounds for the Commission to deny the Motions to Intervene of the Citizen Interveners, Polytop, Toray, TransCanada and OSPRI.

With respect to OSPRI, to the extent that the Commission permits OSPRI to intervene as a party in this proceeding, National Grid agrees with Deepwater that OSPRI's request for a waiver of representation of counsel should be denied. Commission Rule 1.4(a) requires that each participant in a Commission proceeding must be represented by legal counsel. To permit a corporation, such as OSPRI, to participate in this proceeding without legal representation would constitute the unauthorized practice of law in violation of R.I.G.L. § 11-27-2 and Rhode Island Supreme Court Rules, Article II, Rule 9. National Grid agrees with Deepwater that the Commission does not have the authority to grant the requested waiver.

Accordingly, National Grid respectfully urges the Commission to deny the Motions to Intervene of the Citizen Interveners, Polytop, Toray, TransCanada and OSPRI, and the requested waiver of representation of counsel by OSPRI.

Very truly yours,



Jennifer Brooks Hutchinson

cc: Docket 4111 Service List
Leo Wold, Esq.

¹ Submitted on behalf of The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company").

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically submitted, hand delivered and/or mailed to the individuals listed below.



Joanne M. Scanlon

July 8, 2010
Date

National Grid – Review of Proposed Town of New Shoreham Project
Docket No. 4111 – Service List Updated 7/8/10 (9:15 a.m.)

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