

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: DISTRIBUTED GENERATION (DG))
STANDARD CONTRACTS)
AND CEILING PRICES FOR 2013)
_____)

DOCKET NO. 4277 and 4288

MOTION TO INTERVENE
BY
THE TOWN OF COVENTRY

By its attorney, the Town of Coventry hereby moves to intervene in the above-captioned proceeding pursuant to Rule 1.13 (a) and (b) of the Rhode Island Public Utilities Commission (PUC) Rules of Practice and Procedure (Rules). WED has contacted the parties to this proceeding pursuant to PUC Rule 1.15(b) and as of the time of this filing is not aware of any objection to this motion. In support of this motion, Coventry states:

1. Coventry has entered agreements with Wind Energy Development, LLC dba WED Coventry One, LLC (WED), for the development of two wind energy projects in Coventry.
2. Rule 1.13 states any person claiming an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the PUC.
3. Further, Rule 1.13(e) provides that where there is no objection to intervention a properly filed and served motion to intervene shall be granted.
4. It is necessary and appropriate to grant Coventry the right to intervene in this proceeding.
5. Coventry's wind projects are damaged by National Grid's interpretation of the Distributed Generation Long Term Contracts statute which is at issue in National Grid's April 12, 2013 filing requesting to amend the nameplate capacity size for wind.

6. Coventry's interests in these projects are different than those of WED based on the terms of their agreements.
7. In this proceeding, Coventry will advocate for positions that are entirely consistent with the public interest as manifest in many Rhode Island statutes, the Rhode Island State Energy Plan and other public policy. These interests include, but are not limited to, job creation, stable energy pricing, reduced energy costs, a sustainable Rhode Island economy and environmental benefits. In these ways, Coventry has currently unrepresented interests in this proceeding that will be represented by this intervenor.

Please direct service of any correspondence or pleadings in connection with this proceeding to:

Thomas R. Hoover
ICMA CM
Town Manager
Town of Coventry
1670 Flat River Road
Coventry, RI 02816
Office: (401) 822-9185
Email: thoover@town.coventry.ri.us

and

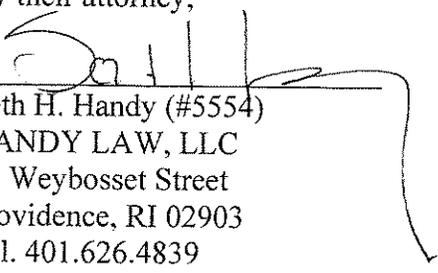
Seth H. Handy
Handy Law, LLC
42 Weybosset Street
Providence, RI 02903
Phone: (401) 626-4839
E-mail seth@handylawllc.com

WHEREFORE, based on the foregoing reasons, Coventry asks that the PUC grant this Motion to Intervene.

Respectfully submitted,

TOWN OF COVENTRY

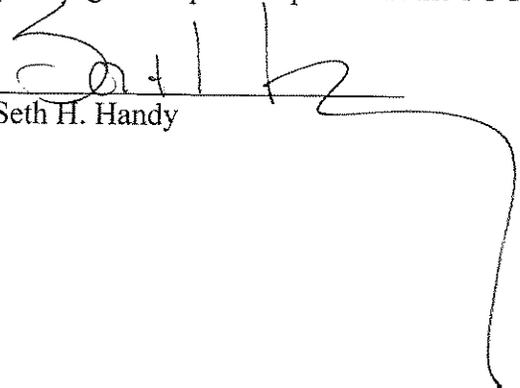
By their attorney,



Seth H. Handy (#5554)
HANDY LAW, LLC
42 Weybosset Street
Providence, RI 02903
Tel. 401.626.4839
E-mail seth@handylawllc.com

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2013, I sent a true copy of the document by electronic mail to the PUC and the service list and filed the original pleading and 9 photocopies with the PUC.



Seth H. Handy