

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

\_\_\_\_\_  
IN RE: DISTRIBUTED GENERATION (DG) )  
STANDARD CONTRACTS )  
AND CEILING PRICES FOR 2011 )  
\_\_\_\_\_ )

DOCKET NO. 4288

**MOTION TO INTERVENE**  
**BY**  
**THE WASHINGTON COUNTY REGIONAL PLANNING COUNCIL**

By its attorneys, the Washington County Regional Planning Council (WCRPC), 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). WCRPC 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, WCRPC states:

1. WCRPC is a coalition of municipalities (North Kingstown, South Kingstown, Exeter, Narragansett, Charlestown, Hopkinton, Richmond, Westerly, and New Shoreham) that employs a coordinated approach to more effectively address issues that transcend municipal boundaries. WCRPC is comprised of one town council member from each of the nine towns within the county, and serves as a unique forum for inter-municipal communication, coordination and cost-sharing.
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 WCRPC the right to intervene in this proceeding.

5. WCRPC has an interest that is directly affected by this proceeding and is not adequately represented by the existing parties. WCRPC is planning, on behalf of its municipal members, renewable energy projects some of which anticipate reliance on the rate and power delivery mechanism offered through Rhode Island's distributed generation long term contracts law and this proposed tariff.
6. In this proceeding WCRPC 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, the residents of Washington County all have 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:

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[jb@wcrpc.org](mailto:jb@wcrpc.org)

and

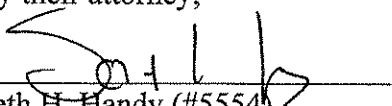
Seth H. Handy  
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WHEREFORE, based on the foregoing reasons, WCRPC asks that the PUC grant this Motion to Intervene.

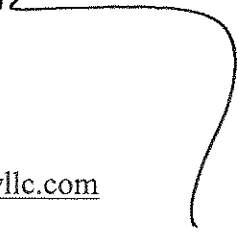
Respectfully submitted,

THE WASHINGTON COUNTY REGIONAL  
PLANNING COUNCIL

By their attorney,

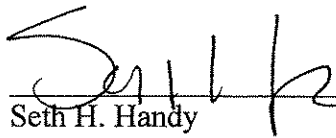


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CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2011, I mailed this original pleading and 9 photocopies to the PUC and sent a true copy of the document by electronic mail to the parties, the Office of Energy Resources, National Grid, The Division of Public Utilities and Carriers Advocacy Section and the Conservation Law Foundation.



Seth H. Handy

