

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

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

DOCKET NO. 4288

MOTION TO INTERVENE
BY
WIND ENERGY DEVELOPMENT, LLC

By its attorneys, Wind Energy Development, LLC (WED), 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, WED states:

1. WED is a developer of wind energy projects in Rhode Island .
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 WED the right to intervene in this proceeding.
5. WED has an interest in the pricing for wind energy contracts that is directly affected by this proceeding and is not adequately represented by the existing parties. WED is planning wind projects some of which anticipate reliance on the rate and power delivery mechanism offered through Rhode Island's distributed generation long term contracts law ("DG law") and this proposed tariff.

6. WED is currently planning a wind project in Coventry Rhode Island that will rely on the DG Law pricing and is significantly impacted by the rate reduction proposed in the Office of Energy Resources filing on January 8, 2013.
7. In this proceeding WED 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, WED 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:

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

Respectfully submitted,

WIND ENERGY DEVELOPMENT, LLC

By their attorney,



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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 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