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~ ALSO U.S. SUPREME COURT
* ALSO MASSACHUSETTS BAR
~ ALSO CONNECTICUT BAR
** ALSO WASHINGTON, D.C. BAR
~ ALSO MICHIGAN BAR
‡ OF COUNSEL

Luly E. Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick RI 02888

March 5, 2013

RECEIVED
2013 MAR - 6 PM 1:32
PUBLIC UTILITIES COMMISSION

Dear Ms. Massaro:

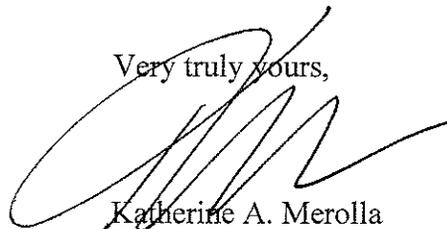
RE: *Interstate Navigation Co. - Docket 4373 - Rate Application Filing*

Enclosed please find an original and nine copies of the following document:

**MOTION OF THE TOWN OF NEW SHOREHAM
FOR EXTENSION OF TIME TO FILE INTERVENOR DIRECT TESTIMONY**

Thank you for your attention to this matter.

Very truly yours,



Katherine A. Merolla

KAM: zmp
Enclosures

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

RECEIVED
2013 MAR -6 PM 1:32
PUBLIC UTILITIES COMMISSION

_____))
INTERSTATE NAVIGATION COMPANY)
RATE FILING)
_____)

DOCKET NO. 4373

**MOTION OF THE TOWN OF NEW SHOREHAM
FOR EXTENSION OF TIME TO FILE INTERVENOR DIRECT TESTIMONY**

The Town of New Shoreham (the "Town") hereby moves for a two-week extension of time until March 26, 2013 to file Direct Testimony.

In support of this motion, the Town states that yesterday the town manager obtained a complete copy of the settlement agreement between the Division and the Company with exhibits. Pursuant to the Procedural Schedule for Interstate Navigation Company's Rate Filing Docket No. 4373, the Town's Direct Testimony is due by Tuesday, March 12, 2013.

The additional time is required for the Town to review the Settlement Agreement in detail, to obtain public input, and to comment concerning the terms and conditions of the Settlement Agreement as well as to suggest additional items which the Town believes should be included in the order of the Commission with respect to this rate filing.

The Town further states that counsel to the Town has contacted Attorney Leo Wold to determine the Division's position with respect to the motion and was advised that although the Division would not consent to the extension, he did not know if an objection would be filed. In addition, counsel to the Town attempted to contact Attorney Michael McElroy to determine the Company's position; however, Attorney McElroy is hospitalized and counsel to the Town was unable to discuss this matter with him.

The Town requests that the Commission expedite ruling on this motion.

Wherefore, the Town respectfully requests that the Commission grant the Town's Motion for an Extension.

Respectfully submitted,
TOWN OF NEW SHORHAM
By its attorneys,

Merolla & Accettura

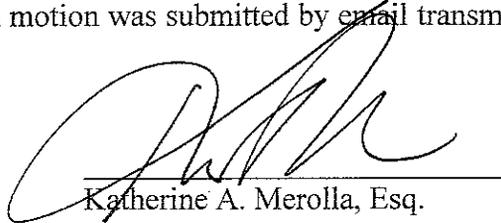


Katherine A. Merolla, Esq.
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Phone: (401) 739-2900, ext. 304

Dated: March 5, 2013

CERTIFICATION

I hereby certify that the within motion was submitted by email transmission to all persons on the service list on March 5, 2013.



Katherine A. Merolla, Esq.