

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

NATIONAL GRID'S ELECTRIC)
INFRASTRUCTURE, SAFETY & RELIABILITY)
PLAN FOR 2016)
_____)

Docket No. 4539

MOTION TO INTERVENE

BY

**WED COVENTRY ONE, LLC, WED COVENTRY TWO, LLC,
WED COVENTRY THREE, LLC, WED COVENTRY FOUR, LLC,
WED COVENTRY FIVE, LLC & WED COVENTRY SIX, LLC**

By its attorneys, WED Coventry One, LLC, WED Coventry Two, LLC, WED Coventry Three, LLC, WED Coventry Four, LLC, WED Coventry Five, LLC & WED Coventry Six, 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). In support of this motion, WED states:

1. WED are the developers of six wind energy project in Coventry, 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 COV4 the right to intervene in this proceeding.
5. WED received an interconnection impact study for the six projects including a charge of almost \$13 million to interconnect the project, over \$12 million of which was for capacity improvements to National Grid's distribution system.
6. WED's interests are directly affected by this proceeding and WED is not adequately represented by the existing parties.

7. In this proceeding, WED will advocate for positions that are 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:

Mark DePasquale
Wind Energy Development, LLC
3760 Quaker Lane
North Kingstown, RI 02852
md@wedenergy.com

and

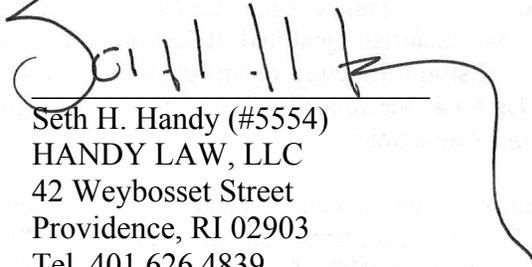
Seth H. Handy
Handy Law, LLC
42 Weybosset Street
Providence, RI 02903
Phone: (401) 626-4839
E-mail seth@handylawllc.com

WHEREFORE, WED asks that the PUC grant this Motion to Intervene.

Respectfully submitted,

WED COVENTRY ONE, LLC, WED
COVENTRY TWO, LLC, WED COVENTRY
THREE, LLC, WED COVENTRY FOUR, LLC,
WED COVENTRY FIVE, LLC, WED
COVENTRY SIX, LLC

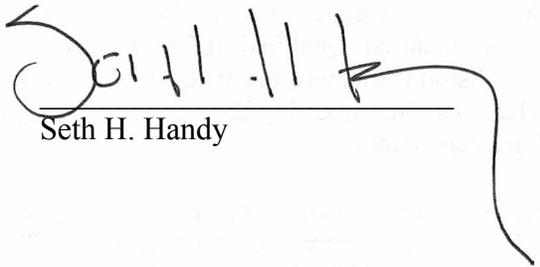
By their attorney,



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 February 10, 2015, 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