

November 13, 2015

Via Hand-Delivery

Luly Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, R.I. 02888

RE: Review of Electric Distribution Design Pursuant to R.I. Gen. Laws §39-26.6-24 - Docket
No.: 4568
Motion for Late Intervention

Dear Ms. Massaro:

On behalf of CME Energy LLC ("CME") and Hecate Energy LLC ("Hecate"), please find enclosed CME's and Hecate's Motion for Late Intervention.

Please let me know if you have any questions concerning this correspondence and Motion.

Sincerely,



ALAN M. SHOER
ashoer@apslaw.com

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION

**IN RE: REVIEW OF ELECTRIC :
DISTRIBUTION DESIGN PURSUANT : DOCKET NO. 4568
TO R.I. GEN. LAWS §39-26.6-24 :**

**MOTION FOR LATE INTERVENTION BY
HECATE ENERGY LLC AND CME ENERGY LLC**

Hecate Energy LLC ("Hecate") and CME Energy LLC ("CME"), by their attorneys, hereby moves to intervene in the above-captioned proceeding pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission Rules of Practice and Procedure ("Rules"). In support of this motion, Hecate and CME state the following:

1. Hecate and CME are development companies that have developed, and continue to develop, renewable energy projects in Rhode Island in response to the Distributed Generation Standard Contracts program and the Renewable Energy Growth program. Hecate and CME have just been informed that National Grid seeks to apply a new and long-term "access fee" to existing, pending, and future renewable energy projects in Rhode Island. Hecate and CME would be significantly impacted by this proposed access fund.
2. Rule 1.13(b) provides that any person claiming an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Rhode Island Public Utilities Commission ("PUC"). National Grid's proposal to implement an access fee on Hecate's and CME's projects in Rhode Island will have a significant and negative impact on the financial security for these projects. Rule 1.13(b)(2) provides that such a right or interest may be: "An interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding."

3. It is necessary and appropriate to grant Hecate and CME 's motion to intervene because Hecate and CME have an interest that is directly and significantly affected by this proceeding, which is not adequately represented by existing parties. Also, the rights of the parties in this matter will not be harmed or prejudiced by this intervention.

4. Rule 1.13(f) provides for the Commission to allow for late intervention as long as the intervenors who are granted party status are bound by the agreements reached and orders entered in the proceedings prior to their intervention. Granting of Hecate and CME's Motion will not create undue prejudice or hardship to the other parties involved with this proceeding; on the contrary, allowing Hecate and CME to intervene will ensure that the Commission hears from companies impacted by the new access charge proposal.

5. Hecate and CME were unaware of National Grid's proposed implementation of charges and access fees when they successfully bid into the DG Contract Program, and more recently in the Renewable Energy Grown Program (with a pending Certificate of Eligibility), for their development Projects located at the Forbes Street Landfill Site in East Providence, RI. Once Hecate and CME became aware of National Grid's proposed implementation of the access fee, through industry notices, Hecate and CME's immediately filed this Motion.

6. Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted. Hecate and CME notified the parties on November 12, 2015, via the email service list for Docket 4568 of their intent to file a Motion for Late Intervention. No party has objected. If granted, Hecate and CME request that service of any correspondence or pleadings in connection with this proceeding be sent to:

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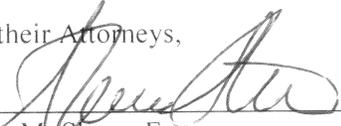
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WHEREFORE, for the reasons stated herein, Hecate and CME respectfully request that the Rhode Island Public Utilities Commission grant this motion and allow Hecate and CME to intervene in this proceeding.

Respectfully Submitted,

Hecate Energy LLC and CME Energy LLC

By their Attorneys,



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Certification

I hereby certify that this 13 day of November, 2015, I mailed this original pleading and 10 copies to the Public Utilities Commission and sent a true copy of the document by electronic mail to the parties listed on the service list for Docket 4568 as of 10/23/15.

