

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

<p>REVIEW OF ELECTRIC DISTRIBUTION) DESIGN PURSUANT TO R.I. GEN. LAWS) § 39-26.6-24)</p>	<p>Docket No. 4568</p>
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MOTION TO INTERVENE
BY
GREEN DEVELOPMENT, LLC
dba WIND ENERGY DEVELOPMENT, LLC

By its attorneys, Green Development, LLC dba 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). In support of this motion, WED states:

1. WED are the developers of wind energy projects in North Kingstown, Coventry, Portsmouth, and West Warwick, 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. The “access fee” that National Grid proposes to charge distributed generation projects in this docket threatens the financial security and the financing of WED’s existing and proposed projects.

6. Despite the statutory requirements at R.I. General Laws §39-26.6-24(b)(6) and National Grid's alleged support for renewable energy, the proposed customer charges and access fee are contrary to the purposes of the statute under which they are proposed:

to facilitate and promote installation of grid-connected generation of renewable-energy; support and encourage development of distributed renewable energy generation systems; reduce environmental impacts; reduce carbon emissions that contribute to climate change by encouraging the siting of renewable energy projects in the load zone of the electric distribution company; diversify the energy generation sources within the load zone of the electric distribution company; stimulate economic development; improve distribution system resilience and reliability within the load zone of the electric distribution company; and reduce distribution system costs.

7. In proposing its charges and fees, National Grid has not properly or fully considered "[t]he benefits of distributed-energy resources" as required by R.I. General Laws §39-26.6-24(b)(1).
8. In this proceeding, WED will advocate for positions that are consistent with the public interest as put forth in many Rhode Island statutes and public policies and as are manifest in WED's specific projects including, but not limited to electric supply diversification, energy security and resilience, stable and reduced energy costs, job creation and environmental benefit. 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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and

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

Respectfully submitted,

GREEN DEVELOPMENT, LLC dba
WIND ENERGY DEVELOPMENT, LLC

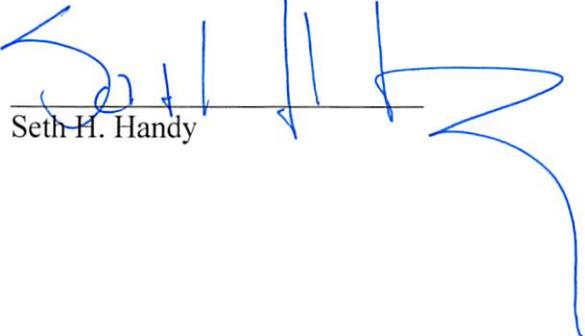
By their attorney,



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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 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