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VIA OVERNIGHT COURIER

August 3, 2015

Luly Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**Re: NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID
Solicitations for Proposals for Clean Energy Projects Pursuant to
R.I. Gen. Laws § 39-31-1, Docket No. 4570**

Dear Ms. Massaro:

Please find attached for filing in the above-captioned proceeding, an original and nine (9) copies of the Motion to Intervene of Vermont Green Line DevCo, LLC, along with my appearance in the matter.

Thank you for your assistance. Please do not hesitate to contact me if you have any questions.

Sincerely,



Patricia M. French
R.I. Bar No. 4980

Enclosures

cc: Service to Active Party List via MPUC e-notification

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

IN RE: NARRAGANSETT ELECTRIC COMPANY)
 d/b/a NATIONAL GRID)
 Solicitation for Proposals for Clean Energy Projects)
 Pursuant to R.I. Gen. Laws § 39-31-1)

Docket No. 4570

**MOTION TO INTERVENE OF
VERMONT GREEN LINE DEVCO, LLC**

Pursuant to Rule 1.13 of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission (“Commission”), Vermont Green Line DevCo, LLC (“Vermont Green Line”) hereby moves to intervene in the above-captioned proceeding as a full party. As a developer of an interstate electric transmission project that will be committed to ensuring the transmission of renewable energy into southern New England, Vermont Green Line supports Narragansett Electric Company d/b/a National Grid’s (“Narragansett’s”) request that the Commission approve Narragansett’s proposed Request for Proposal (“RFP”) and respectfully joins in Narragansett’s request that the Commission do so expeditiously.

I. BACKGROUND

On June 26, 2015, Narragansett Electric Company d/b/a National Grid (“Narragansett”) filed its Request for Proposal (“RFP”) with the Commission for its review and approval pursuant to the Affordable Clean Energy Security Act, R.I. Gen. Laws § 39-31-1 et seq. (“the Act”). Narragansett states that, as a Rhode Island electric distribution company, it may participate in the development and issuance of regional competitive solicitations for the development and

construction of regional electric transmission projects that meet the requirements of the Act.¹ Narragansett states the proposed RFP was prepared through a joint effort of utility and state stakeholders in the States of Rhode Island and Connecticut, and the Commonwealth of Massachusetts.² The goal of the joint effort was to create a standardized methodology for bid solicitation and evaluation.³

II. THE PROPOSED RFP

The proposed RFP seeks bids in numerous bid categories in order to obtain the largest number of potential response participants, both for in-region resources and out-of-region resources. The Eligible Projects solicited are designed to accommodate the broadest range of interests, from Qualified Clean Energy and/or from developers of Transmission Projects, with or without renewable energy credits, based on cost-to-serve or performance based rates, and with or without a PPA.⁴ The proposed RFP sets forth the submission requirements,⁵ establishes communications protocols,⁶ and a detailed evaluation and selection process that ensures objective and transparent review of the quantitative and qualitative factors presented by the responses.⁷ A sophisticated review team will analyze the responses submitted by all Bidders that are shown to have complied with the RFP's requirements and instructions.⁸ The proposed RFP appears to be respectful of the mandates set forth in the Act and the proposed RFP includes the requirement that Narragansett will obtain the Commission's pre-approval of any contract that

¹ Explanatory Letter accompanying Narragansett's June 26, 2015 filing, at p. 1.

² *Id.* at pp. 1-2.

³ *Id.* at p. 2.

⁴ Attachment to Narragansett's June 26, 2015, filing, at pp. 6-8.

⁵ *Id.*, at p. 11

⁶ *Id.*, at p. 10.

⁷ *Id.*, at pp. 15-32.

⁸ *Id.*, beginning at p. 34 (bottom).

may result from Narragansett's RFP process.⁹ Bidders are clearly notified that the Commission's approval will only be granted if: 1) such resulting contract is consistent with the purposes of the Act; (2) the contract will benefit the state by improving local and regional energy system reliability and security; (3) the contract will benefit Rhode Island customers by offering the potential for reduced-energy price volatility and reduction of energy-supply costs in the context of an integrated regional energy system; (4) the contract will not cause unacceptable harm to the environment and is consistent with the region's greenhouse gas-reduction goals; and (5) the contract will enhance the economic fabric of the state.¹⁰ Moreover, the Commission's approval of the proposed RFP does not commit Narragansett to any contract or obligation.

Pursuant to Rhode Island Gen. Laws §39-31-6(a)(1)(i), any contract awarded under the Act must result from a competitive process that is reasonable and open, permitting a reasonable amount of negotiating discretion to obtain final contract terms. Vermont Green Line supports the proposed RFP as consistent with the requirements of the Act.

III. VERMONT GREEN LINE HAS A SUBSTANTIAL INTEREST

The Vermont Green Line is a proposed electric transmission line running from Plattsburg, New York to New Haven, Vermont that positions New England with a "transmission greenway" to secure affordable renewable power, enabling New England to move substantially down the path to a carbon-free future. While the New England states have collectively committed to meeting an increasing share of their electricity needs with renewable energy sources, and each year this need grows by the equivalent of 400-500 MW of new wind farm

⁹ *Id.*, at p. 33.

¹⁰ Act; *see also* Attachment to Narragansett's June 26, 2015 filing, at p. 34.

capacity, Vermont Green Line recognizes that siting difficulties and transmission constraints make it increasingly difficult to meet this need from resources located within New England. Vermont Green Line, therefore, has established a development goal to enable cost-effective delivery of renewable power from northern New York (or beyond) into New England. At this time, Vermont Green Line expects to participate in the bidding process that results from the Commission's expeditious review of Narragansett's proposed RFP. Accordingly, Vermont Green Line has a substantial interest in the outcome of this proceeding. No other party can adequately represent Vermont Green Line's interest herein.

Vermont Green Line respectfully requests that the Commission place the following individuals on the service list for this proceeding, along with Vermont Green Line's counsel as below:

Mr. Bryan Sanderson
Vermont Green Line
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James Broder, Esq.*
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IV. CONCLUSION

Wherefore, Vermont Green Line respectfully requests that the Rhode Island Public

Utilities Commission grant its motion to intervene in this proceeding with rights to participate as a full party.

Respectfully submitted,
VERMONT GREEN LINE DEVCO, LLC
By its Attorney,

A handwritten signature in black ink, appearing to read 'P. French', is written over a horizontal line.

Patricia M. French, Esq. (R.I. Bar No. 4980)
BERNSTEIN SHUR
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Portland, ME 04101
(207) 228-7288 (office)
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Dated at Portland, Maine, this 3rd day of August, 2015.

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

IN RE: NARRAGANSETT ELECTRIC COMPANY)
 d/b/a NATIONAL GRID)
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Docket No. 4570

**ENTRY OF APPEARANCE OF COUNSEL
ON BEHALF OF
VERMONT GREEN LINE DEVCO, LLC**

The undersigned attorney hereby enters her appearance in this matter as counsel for
Vermont Green Line DevCo, LLC.

Respectfully submitted,

VERMONT GREEN LINE DEVCO, LLC
By its Attorney,



Patricia M. French, Esq. (R.I. Bar No. 4980)
BERNSTEIN SHUR
100 Middle Street
Portland, ME 04101
(207) 228-7288 (office)
pfrench@bernsteinshur.com

Dated at Portland, Maine, this 3rd day of August, 2015.

CERTIFICATE OF SERVICE

I certify that a copy of the within Motion to Intervene and Appearance of Counsel was served on all persons listed on the service list for Docket No. 4570 as maintained by Luly Massaro, Commission Clerk, on August 3rd, 2015.

A handwritten signature in black ink, appearing to be "Luly Massaro", is written over a horizontal line.