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July 20, 2016

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

Re: The Narragansett Electric Co. d/b/a National Grid - Docket 4627

Dear Ms. Massaro:

RAYNHAM OFFICE:

90 NEW STATE HIGHWAY

RAYNHAM, MA 02109

TEL. (508) 822-2813

FAX (508) 822-2832

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

1. NextEra Energy Resources, LLC's Unopposed Motion To Intervene

Please note that an electronic copy of this document has been provided to the service list.

Thank you for your attention to this matter.

Sincerely,

Joseph A. Keough, Jr.

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JAK/kf Enclosures

cc: Docket 4627 Service List (via electronic mail)

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

IN RE: THE NARRAGANSETT ELECTRIC

COMPANY D/B/A NATIONAL GRID REQUEST :

FOR APPROVAL OF A GAS CAPACITY CONTRACT : DOCKET NO. 4627

AND COST RECOVERY PURSUANT TO :

R.I. GEN. LAWS § 39-31-1 TO 9 :

NEXTERA ENERGY RESOURCES, LLC'S UNOPPOSED MOTION TO INTERVENE

Pursuant to Rule 1.13 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission ("Commission"), NextEra Energy Resources, LLC ("NEER"), moves that the Commission grant NEER the right to intervene as a party in the above-captioned docket for the reasons set forth herein:

- 1. The Narragansett Electric Company, d/b/a National Grid ("National Grid") filed a Request for Approval of a Gas Capacity Contract and Cost Recovery on June 30, 2016.
- 2. In its request, National Grid seeks the Commission's approval to enter into a contract with Algonquin Gas Transmission Company, LLC (Algonquin Gas) for natural gas transportation capacity and storage services.
- 3. In response to this request, the Commission opened the above captioned Docket.
- 4. NEER, a limited liability company located at 700 Universe Boulevard, Juno Beach, Florida, is a leading producer of clean and renewable energy through its affiliates in North America.

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- 5. Through its affiliates, NEER owns and operates a diverse portfolio of power generation resources across the United States and Canada that includes wind, natural gas, nuclear, solar, and oil.
- 6. NEER is the largest generator of wind and solar power in North America, and NEER's generation fleet has a total generating capacity of 19,578 MW as of January 1, 2015.
- 7. In New England, NEER, through its affiliates, operates power generation facilities. In Massachusetts, a NEER affiliate owns and operates the duel-fuel capable, 300 MW combined-cycle power plant located at the Bellingham Energy Center in Bellingham, Massachusetts through a joint venture with Engie, S.A. The Bellingham Energy Center takes gas from the Algonquin Gas Transmission pipeline operated by Spectra Energy Corporation. In New Hampshire, a NEER affiliate owns 88.23% of and operates Seabrook Station, a nuclear power plant located in Seabrook, New Hampshire. Seabrook Station has a generating capacity of 1,247 MW, making it one of the largest power generators in the ISO-NE region. In Maine, NEER affiliates own and operate the Cape Energy Station, a two-unit 45 MW oil-fired generation facility located in South Portland, Maine; own and operate Units 1-3 of the W.F. Wyman Station, oil-burning generators in Yarmouth, Maine with a generating capacity of approximately 228 MW; and own a majority interest in and operate Unit 4 of the W.F. Wyman Station, which has a generating capacity of about 620 MW.
- 8. A NEER affiliate is also among the nation's leading natural gas marketers. NEER's power marketing affiliate operates in New England's markets where it buys and sells natural gas at wholesale and acquires capacity on all the gas pipelines in the region, including the Algonquin Pipeline.

Intervention in Commission proceedings is governed by Rule 1.13 of the
 Commission's Rules of Practice and Procedure, which states:

"Subject to the provisions of these rules, any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission. Such right or interest may be:

- (1) A right conferred by statute.
- (2) 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. (The following may have such an interest: consumers served by the applicant, defendant, or respondent; holders of securities of the applicant, defendant, or respondent.)
- (3) Any other interest of such nature that movant's participation may be in the public interest."
- directly affected by the Commission's review and decision in this matter. NEER participates in various aspects of the energy markets in New England and has substantial interests that may be affected by this proceeding in fundamental ways. National Grid's proposal will interfere with existing market-based programs by using electric distribution company ratepayer guarantees to subsidize investment in infrastructure that favors one type of fuel—natural gas—over all others in a competitive generation market. The ramifications of this will be felt by all electricity generators in the region (whether fueled by natural gas, nuclear, gas/oil or renewable sources). NEER also has affiliates that buy and sell natural gas at wholesale in the region, both for its generating assets and for other customers. Because National Grid's Petition proposes an intervention in the market for natural gas in the region that will disrupt and distort that market, it may affect NEER's substantial interest in conducting transactions in wholesale natural gas markets.

11. These interests are not adequately represented or protected by the existing parties in this Docket, and NEER may be bound by the Commission's action in this Docket.

12. NEER's participation in this Docket will be in the public interest.

13. At a procedural scheduling conference for this Docket on July 12, 2016, the

existing parties to this Docket indicated they have no objection to NEER's Motion to Intervene.

WHEREFORE, NextEra Energy Resources, LLC, requests that the Commission grant its

Motion to Intervene, that it be granted status as a party in this proceeding, and that the

Commission grant all other relief it deems meet and just.

NextEra Energy Resources, LLC

By its attorney,

Joseph A. Keough, Jr. (#4925)

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Dated: July 20, 2016

CERTIFICATION

I hereby certify that on July 20, 2016, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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