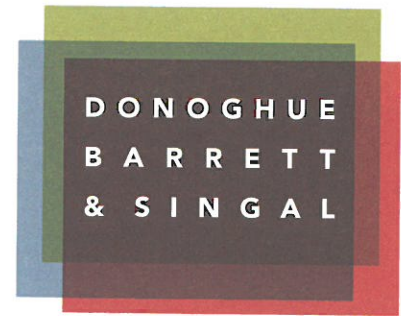


William M. Dolan III
Counselor at Law
wdolan@dbslawfirm.com



July 29, 2016

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

In Re: Docket No. 4627, The Narragansett Electric Company d/b/a National Grid
Request for Approval of a Gas Capacity Contract and Cost Recovery Pursuant to
R.I. Gen. Laws § 39-31-1 to 9

Dear Ms. Massaro:

Enclosed please find for filing, pursuant to the Procedural Schedule in the above-captioned proceeding, the original and three (3) copies of the following:

1. My Notice of Appearance; and
2. Motion to Intervene of Repsol Energy North America Corporation.

Please note that copies of the above documents have been provided to you and the Service List via electronic mail.

Should you have any questions regarding the foregoing, please do not hesitate to contact me.

Very truly yours,

William M. Dolan III

Enclosures

cc: Docket 4627 Service List (via electronic mail)

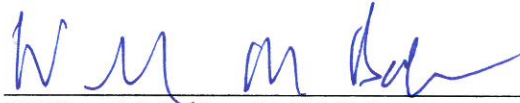
STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION

IN RE: THE NARRAGANSETT ELECTRIC :
COMPANY d/b/a NATIONAL GRID REQUEST :
FOR APPROVAL OF A GAS CAPACITY : DOCKET NO. 4627
CONTRACT AND COST RECOVERY :
PURSUANT TO R.I. GEN. LAWS § 39-31-1 TO 9 :

NOTICE OF APPEARANCE

Now comes William M. Dolan III of the law firm of Donoghue Barrett & Singal, P.C. and, pursuant to Rule 1.4 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, hereby enters his appearance in this matter on behalf of Repsol Energy North America Corporation.




William M. Dolan III (#4524)
DONOGHUE BARRETT & SINGAL, P.C.
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Providence, RI 02903
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(401) 454-0404 Facsimile
wdolan@dbslawfirm.com

Date: July 29, 2016

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2016, I served a copy of the within document to all parties listed on the Service List for Docket 4627 by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.



William M. Dolan III

**Docket No. 4627 – National Grid - Gas Capacity Contract and Cost Recovery
Service List updated 7/28/16**

Name & Company	E-mail	Phone
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	Joanne.scanlon@nationalgrid.com ;	
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**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 :

**MOTION TO INTERVENE OF
REPSOL ENERGY NORTH AMERICA CORPORATION**

Pursuant to Rules 1.13 and 1.15 of the Public Utilities Commission (“PUC”) Rules of Practice and Procedure and the Notice of Pre-Hearing Conference, Intervention Deadline, and Public Comment Hearing issued on July 8, 2016, Repsol Energy North America Corporation (“RENA”), by and through its undersigned counsel, hereby moves to intervene and participate in the above-captioned proceeding. As grounds for this motion, RENA states:

1. RENA and its affiliate Repsol Energy Canada Ltd (“REC”) provide a full range of natural gas trading and origination services in North America including baseload gas purchases and sales, structured and daily natural gas transactions, seasonal and peaking gas supply services, daily natural gas trading and asset management. Specifically, with respect to its ability to serve New England gas markets, RENA’s affiliate REC has contracted for approximately 1,000,000 dekatherms per day (“Dth/d”), which is 100 percent of the capacity of the CanaportTM LNG facility at Saint John, New Brunswick, Canada (“Canaport LNG”).¹ With REC having a long-term contract in place for 100 percent of this

¹ Canaport LNG is jointly owned by Repsol Partners (75 percent) and Irving Partners (25 percent).

capacity and RENA having a corresponding long-term contract in place for 730,000 Dth/d of firm transportation capacity on Maritimes & Northeast Pipeline, L.L.C., RENA has the ability to supply New England gas markets with substantial volumes of natural gas through deliveries into the eastern ends of Algonquin Gas Transmission, LLC at Beverly-Salem, MA and Tennessee Gas Pipeline Company, L.L.C. at Dracut, MA. RENA has been serving the New England market since 2008 and plays a very critical role in supplying the winter peak needs of the region via the fast response and high deliverability capabilities of Canaport LNG.

2. On June 30, 2016, the Narragansett Electric Company d/b/a/ National Grid filed for approval by the PUC a 20-year contract precedent agreement (“Precedent Agreement”) with Algonquin Gas Transmission Company LLC (“Algonquin”) for natural gas transportation capacity and storage services on Algonquin’s Access Northeast Project (“ANE Project”).
3. The Precedent Agreement is the result of an RFP that was issued on October 23, 2015.
4. National Grid received nine bids on November 13, 2015 encompassing five interstate pipeline companies and four LNG suppliers.
5. RENA was one of the four LNG suppliers that submitted a proposal for natural gas services.
6. RENA’s proposal would best satisfy the gas service needs established by the RFP in the most efficient and economic manner without the need for expensive new gas pipeline infrastructure, but its proposal was not selected.

7. The ANE Project will flood the New England market with 900,000 MMBtu/day of unneeded pipeline capacity that will distort the market for natural gas and will result in Rhode Island electric ratepayers being burdened with excess pipeline capacity costs for years to come.
8. PUC Rule 1.13 provides that “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.” PUC Rule 1.13(b) further provides that such right or interest may be “[a]n 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 . . .” or “[a]ny other interest of such nature that movant’s participation may be in the public interest.”
9. RENA has a substantial and specific economic interest in operating in well-functioning competitive wholesale natural gas markets. RENA’s interests are not adequately represented by existing parties.
10. The Rhode Island Office of Energy Resources and the Rhode Island Division of Public Utilities and Carriers specifically asked Black & Veatch to perform quantitative analysis of LNG bids received from GDF Suez and RENA.
11. RENA has knowledge and expertise in the area of gas transportation and energy markets and can attest to its own costs and ability to enter long-term contracts with distribution companies in the public interest or offer service in competitive markets. RENA’s participation as a full party intervenor will assist the PUC in

developing a comprehensive record and in resolving issues in this docket.

Therefore, RENA's participation is in the public interest.

12. RENA requests that all notices, testimony, pleadings, and correspondence pertaining to these proceeding be directed to:

Robert Neustaedter
Director, Regulatory Affairs
Repsol Energy North
America Corporation
2455 Technology Forest Blvd.
The Woodlands, Texas 77381
robert.neustaedter@repsol.com
(832) 442-1548

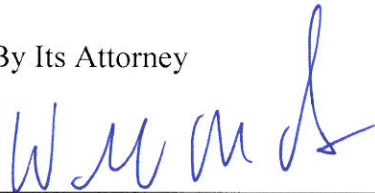
Carolynn Mayhew
Senior Counsel
Repsol Energy North
America Corporation
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The Woodlands, TX 77381
carolynn.mayhew@repsol.com
(832) 442-1533

WHEREFORE, for the foregoing reasons, RENA respectfully requests that the Department grant this Motion to Intervene.

Respectfully submitted,

REPSOL ENERGY
NORTH AMERICA CORPORATION

By Its Attorney

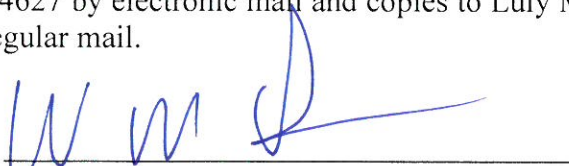


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Date: July 29, 2016

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William M. Dolan III

**Docket No. 4627 – National Grid - Gas Capacity Contract and Cost Recovery
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