

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

\_\_\_\_\_  
IN RE: SOLICITATIONS OF LONG-TERM )  
CONTRACTS FOR RENEWABLE ENERGY )  
AND RENEWABLE ENERGY CERTIFICATES )  
(RECS), PURSUANT TO R.I. )  
GEN. LAWS 39-26.1-1 ET SEQ. )  
\_\_\_\_\_

Docket 4822

**MOTION TO INTERVENE**  
**BY**  
**VINEYARD WIND, LLC**

By its attorneys, Vineyard Wind, LLC, 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, Vineyard Wind LLC states:

1. Rule 1.13 states 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. The Rule allows intervention for any party with an interest directly affected that is not adequately represented by existing parties or any other interest of such a nature that movant's participation may be in the public interest.
2. Rule 1.13(e) provides that “[u]nless the Hearing Officer denies a motion for leave to intervene, all timely motions to intervene not objected to by any party within ten (10) calendar days of service of the motion for leave to intervene shall be deemed allowed, provided that the Hearing Officer may, after notice and hearing, thereafter terminate the party status of any intervener.”

3. Vineyard Wind LLC (“Vineyard Wind”) is an offshore wind development company seeking to build the first large-scale offshore wind energy project in the U.S., to be located 14 miles south of Martha’s Vineyard.
4. There is no offshore wind organization that has intervened in this docket to represent the specific issues relevant to an offshore wind bidder.
5. Vineyard Wind has a unique understanding of offshore wind given its team’s experience and our recent participation in Massachusetts’ offshore wind request for proposal process.
6. A competitor of Vineyard Wind previously partnered with National Grid, so Vineyard Wind has a unique interest to ensure that open, competitive market safeguards are sufficient and maintained.
7. Vineyard Wind has an interest in ensuring that Commission Docket 4600 is appropriately implemented in this proceeding per the Commission’s guidance.
8. Vineyard Wind has significant concerns with how the draft request for proposal treats forward renewable energy credit prices, a critically important issue that cannot be adequately addressed through public comment.
9. Vineyard Wind’s intervention will contribute to a more competitive and rigorous bidding process.
10. Vineyard Wind 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 the projects in which Vineyard Wind has interest including, but not limited to, electric supply diversification, energy security and resilience, stable and reduced energy costs, job creation and environmental benefit.
11. It is therefore necessary and appropriate to grant Vineyard Wind the right to intervene in this proceeding.
12. Undersigned counsel has informed the service list of Vineyard Wind’s intent to intervene and has not been informed of any objection.

Please direct service of any correspondence or pleadings in connection with this proceeding to:

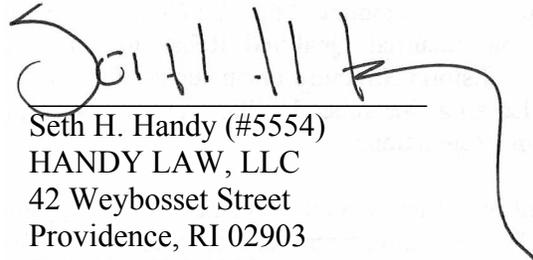
Seth H. Handy  
Handy Law, LLC  
42 Weybosset Street  
Providence, RI 02903  
Phone: (401) 626-4839  
E-mail [seth@handylawllc.com](mailto:seth@handylawllc.com)

WHEREFORE, Vineyard Wind asks that the Commission grant this Motion to Intervene.

Respectfully submitted,

**VINEYARD WIND LLC**

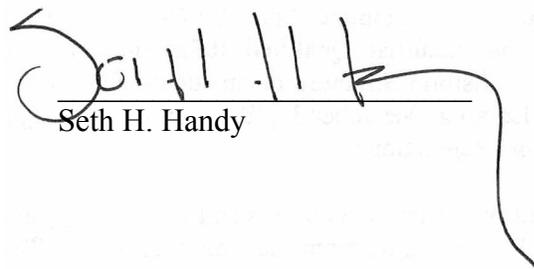
By their attorney,



Seth H. Handy (#5554)  
HANDY LAW, LLC  
42 Weybosset Street  
Providence, RI 02903  
Tel. 401.626.4839  
E-mail [seth@handylawllc.com](mailto:seth@handylawllc.com)

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2018, I sent a true copy of the document by electronic mail to the Commission and the service list and mailed the original pleading and 9 photocopies to the Commission.



Seth H. Handy