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Peter D. Ruggiero Wyatt A. Brochu

May 5, 2011

Luly E. Massaro, Clerk Division of Public Utilities & Carriers 89 Jefferson Blvd. Warwick, RI 02888

Re:

Docket No. D-10-126

May Im Leonardo

Dear Ms. Massaro:

Please find enclosed the original and four copies of the Motion for Clarification filed on behalf of the Towns of Charlestown and Jamestown in the above captioned matter on May 5, 2011.

Sincerely,

MaryAnn Leonardo

Administrative Assistant RUGGIERO BROCHU

Enclosures

OUBLIC UTILITIES COMMISSION

2011 NAY -6 PM 3-31

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS DIVISION OF PUBLIC UTILITIES AND CARRIERS 89 JEFFERSON BOULEVARD

WARWICK, RHODE ISLAND 02883

IN RE:

Complaint by Benjamin Riggs related to Net Metering at the Town of Portsmouth

Wind Generator Facility and National

Grid-Electric

TOWNS OF CHARLESTOWN AND JAMESTOWN'S MOTION FOR CLARIFICATION

Now come the Town of Charlestown, Rhode Island ("Charlestown") and the Town of Jamestown ("Jamestown") (collectively, the "Towns"), by and through its Town Solicitor, and hereby seeks clarification on the Procedural Schedule set by the Division of Public Utilities and Carriers in the above referenced matter. Specifically, the Procedural Schedule set forth several dates in which certain filings were to be made by parties in the matter. In particular, the Procedural Schedule set April 26, 2011 as the date in which National Grid, the Advocacy Section and the Town of Portsmouth were to submit an "Agreed-Upon Statement of Facts." The Towns have not received any such document as of this date. The next date on the Procedural Schedule calls for legal memoranda to be filed by all parties on June 10, 2011.

The Towns now seek clarification on the schedule as to when the Agreed-Upon Statement of Facts will be submitted to all the parties. The Towns assert that if there is further delay in receiving the Agreed-Upon Statement of Facts, then the Towns will not be able to submit their legal memoranda by currently scheduled date of June 10, 2011.

For these reasons, the Towns hereby request the Division of Public Utilities and Carriers to clarify the Procedural Schedule.

Respectfully submitted, TOWNS OF CHARLESTOWN AND JAMESTOWN, RHODE ISLAND By and Through Their Attorney,

Peter D. Ruggiero, Town Solicitor (#5733)

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Dated: May 5, 2011

CERTIFICATION

I, the undersigned, do hereby certify that I did forward a copy of the within Motion for Claification via e-mail to all on the following service list on the 5th day of May, 2011. Paper copies will not be sent unless requested.

Complaint Relating to the Town of Portsmouth Generator Facility – NetMetering
Docket No. D-10-126

Updated 4/04/11

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