

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DIVISION OF PUBLIC UTILITIES AND CARRIERS**

IN RE: COMPLAINT OF BENJAMIN RIGGS RELATING TO PORTSMOUTH GENERATING FACILITY)))))	DOCKET NO. D-10-126
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**MOTION TO INTERVENE
BY
PEOPLE'S POWER AND LIGHT**

By its attorneys, People's Power and Light (PP&L), hereby moves pursuant to Rule 17(b) of the Rhode Island Division of Public Utilities and Carrier's ("Division") Rules of Practice and Procedure ("Rules") to intervene in the above-captioned proceeding and, in support of this motion, states:

1. The leading nonprofit green power provider in New England, Energy Consumers Alliance of New England (ECANE), doing business as PP&L in Rhode Island and Massachusetts Energy Consumers Alliance (Mass Energy) in Massachusetts, works to make energy more affordable and sustainable through consumer empowerment, market-based efforts, and advocacy.
2. PP&L offers the only tax-deductible green power choice, *New England GreenStart*SM, in Rhode Island through National Grid's GreenUp program, which allows customers of National Grid to choose cleaner energy sources through their electric bill.
3. The local energy sources *GreenStart* customers support have the potential to reduce harmful health impacts, minimize effects on our ecosystems, boost the local economy, decrease our dependence on foreign fuels, lower risk of energy price spikes, and help future generations enjoy clean air and water.

4. PP&L members' support of green power adds additional market pressure to grow renewables beyond the state's renewable energy standards and to get more local renewable projects financed and built using voluntary contributions from members, without expense to other ratepayers.
5. PP&L is considering opportunities to build public-benefit wind turbines of its own in Rhode Island, and support similar projects developed by others, which would rely upon access to net metering.
6. PP&L was a lead advocate for drafting and passage of Rhode Island's Renewable Energy Standard, the Comprehensive Energy Act of 2006, and Rhode Island's net metering law revisions of 2007, 2008, and 2009.
7. Rule 17(b) of the Division Rules states "any person with a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Division."
8. Further, Rule 17(b) goes on to state that such a right or interest may be "an interest which may be directly affected and which is not adequately represented by existing parties."
9. It is necessary and appropriate to grant PP&L the right to intervene in this proceeding because PP&L's interest is directly affected by this proceeding and is not adequately represented by existing parties.
10. PP&L's *GreenStart* customers support the Portsmouth turbine because PP&L contracted to purchase the renewable energy GIS certificates for that project, and they have a vested interest in the continued success of Portsmouth's wind project.
11. PP&L represents *GreenStart* customers, which have a unique interest in the proliferation of renewable energy and that interest is broader than the project-based interests represented by the

Towns of Portsmouth, Charlestown, Jamestown or the Washington County Regional Planning Council and such proliferation is impeded and threatened in this proceeding.

12. PP&L also has an interest in future development projects, the economics of which would be jeopardized by the interpretation of net metering propounded by National Grid and the Advocacy Section of the Division of Public Utilities and Carriers.
13. Finally, PP&L invested great resources in the development and passage of Rhode Island's net metering law and that investment and the integrity of the net metering law is at risk in this proceeding.
14. Rule 17(b) also states that such a right or interest to intervene may be "any other interest of such nature that movant's participation may be in the public interest." In supporting the existing rate structure for the Portsmouth wind turbine and net metering projects in planning, PP&L will advocate for a position that is entirely consistent with the public interest as manifest in many Rhode Island statutes, the Rhode Island State Energy Plan and other public policy. These interests include, but are not limited to: reducing harmful health impacts and effects on our ecosystems, boosting the local economy, decreasing our dependence on foreign energy resources, lowering the risk of energy price spikes, and helping future generations enjoy clean air and water.
15. Accordingly, this intervention is necessary and appropriate under Rule 17(b).

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

Karina Lutz
Deputy Director
People's Power & Light and Mass Energy Consumers Alliance
17 Gordon Ave., Suite 201
Providence, RI 02905
karina@ripower.org

and

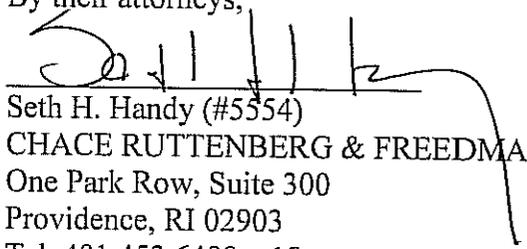
Seth H. Handy
Chace Ruttenger & Freedman, LLP
One Park Row, Suite 300
Providence, RI 02903
E-mail shandy@crflp.com

WHEREFORE, based on the foregoing reasons, PP&L asks that the Division grant this Motion to Intervene.

Respectfully submitted,

PEOPLE'S POWER & LIGHT

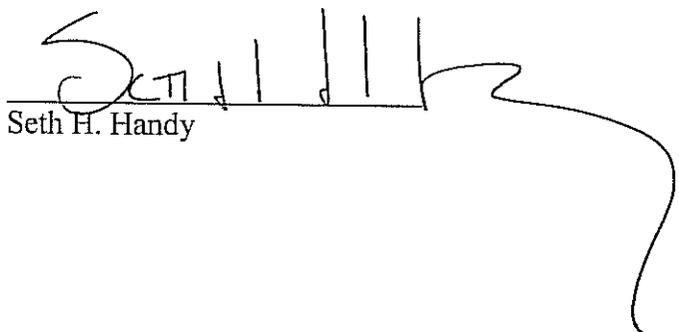
By their attorneys,



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CERTIFICATE OF SERVICE

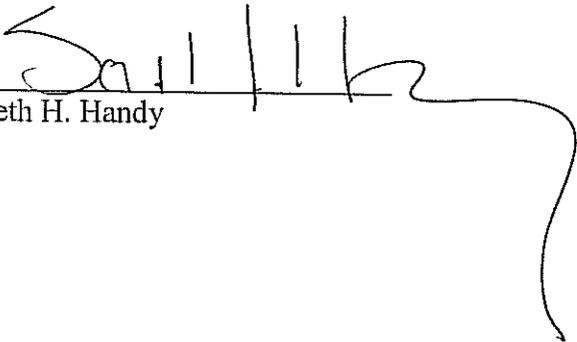
I hereby certify that on March 23, 2011, I delivered a true copy of the foregoing document either by first class mail and by electronic mail to the existing parties, National Grid, The Division of Public Utilities and Carriers Advocacy Section, Benjamin Riggs, the Town of Charlestown and the Town of Jamestown.



Seth H. Handy

CERTIFICATE OF CONSULTATION

I hereby certify that pursuant to Rule 19(b) I have made a good faith effort to determine whether any existing parties object to this motion and have heard that Mr. Riggs does not object but have not been able to determine the position of the other parties.


Seth H. Handy

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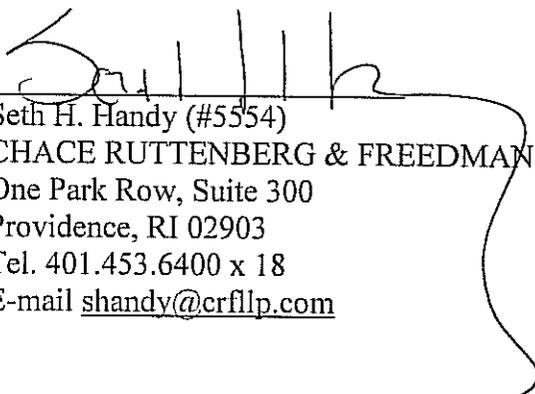
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NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 5 of the Division of Public Utilities and Carrier's Rules of Practice and Procedure, please enter my appearance on behalf of People's Power and Light, in the above-captioned proceeding.

Respectfully submitted,



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Dated: March 23, 2011