

**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

**MOTION FOR A CONTINUANCE**

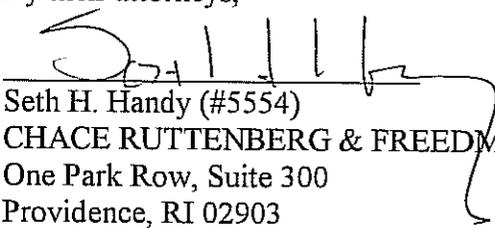
By its attorneys, the Town of Portsmouth (Portsmouth) and the Washington County Regional Planning Council (WCRPC), hereby move for a continuance pursuant to Rule 10(c) of the Rhode Island Division of Public Utilities and Carrier's ("Division") Rules of Practice and Procedure. Due to resource limitations, these parties awaited the filing of the Division's memorandum before making a decision regarding whether to intervene in this proceeding. The current April 7, 2011, hearing date does not give these parties sufficient time to conduct discovery, prepare witness testimony and research and file pre-hearing motions. Therefore, Portsmouth and WCRPC request that the Division continue the hearing for at least sixty (60) days. To the best of our knowledge additional parties will soon be joining this proceeding at which time a scheduling conference may very well be warranted.

WHEREFORE, based on the foregoing reasons, Portsmouth and WCRPC ask that the Division grant this Motion for a Continuance.

Respectfully submitted,

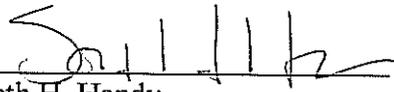
THE TOWN OF PORTSMOUTH and  
THE WASHINGTON COUNTY REGIONAL  
PLANNING COUNCIL

By their attorneys,

  
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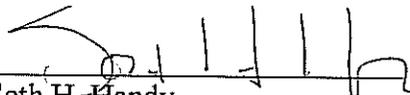
CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2011, I delivered a true copy of the foregoing document either by first class mail or by electronic mail to the existing parties, National Grid, The Division of Public Utilities and Carriers Advocacy Section and Benjamin Riggs.

  
\_\_\_\_\_  
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 had not received a response as of the time of filing.

  
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Seth H. Handy