

*Town of Westerly
Rhode Island*



OFFICE OF THE TOWN SOLICITOR
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March 22, 2011

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

Re: D-10-126; Complaint of Benjamin Riggs

Dear Ms. Massaro:

In regards to the above matter, kindly find the following for filing:

1. Notice of Appearance
2. Motion to Intervene.

I have provided the original and four (4) copies as required. Thank you for your attention to this matter.

Very truly yours,

Michelle A. Buck, Esquire

Enclosure(s)

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PUBLIC UTILITIES COMMISSION

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

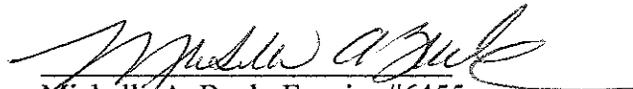
IN RE: COMPLAINT OF BENJAMIN RIGGS)
RELATING TO PORTSMOUTH)
GENERATING FACILITY)
_____)

DOCKET NO. D-10-126

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 the Town of Westerly.

Respectfully submitted,



Michelle A. Buck, Esquire #6455
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PUBLIC UTILITIES COMMISSION

Dated: March 22, 2011

Grid pursuant to that law and approved by the Public Utilities Commission. The outcome of this case will directly affect the feasibility of said projects. Westerly's interest is not adequately represented by any existing parties.

6. Rule 17(b) also states that such a right or interest to intervene may be "any other interest of such nature that the 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, Westerly 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, job creation, stable energy pricing, reduced energy costs, a sustainable Rhode Island economy, and environmental benefits. In these ways, the residents of Westerly have currently unrepresented interests in this proceeding that will be represented by this intervention.
7. 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:

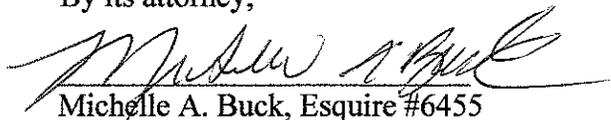
Michelle A. Buck, Esquire
Town Solicitor
45 Broad Street
Westerly, RI 02891
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WHEREFORE, based on the foregoing reasons, the Town of Westerly asks that the Division grant this Motion to Intervene.

Respectfully submitted,

THE TOWN OF WESTERLY

By its attorney,

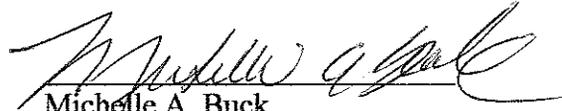


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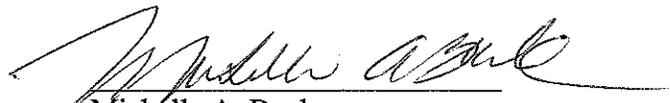
CERTIFICATE OF SERVICE

I hereby certify that on March 22, 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, The Town of Charlestown, Town of Jamestown, Town of Portsmouth, and Washington County Regional Planning Council, and Benjamin Riggs.


Michelle A. Buck

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 confirmed that Mr. Riggs, the Washington County Regional Planning Council, and the Town of Portsmouth, have no objection but have not been able to determine the position of the other parties.


Michelle A. Buck