

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

RHODE ISLAND FAST FERRY)
CPCN APPLICATION)
DOCKET NO. D-13-51)

MOTION TO INTERVENE OF THE TOWN OF NEW SHOREHAM

Pursuant to Sections 1.13 and 1.16 of the Commission’s Procedural Rules, the Town of New Shoreham (the “Town”) hereby moves to intervene in the above-captioned matter.

1. The Rhode Island Fast Ferry (the “Fast Ferry”) plans to deliver passengers to Block Island. These passengers will spend time in the Town and appropriate accommodations must be provided. In addition, Town residents and visitors will be consumers who will be served by the applicant. Accordingly, the Town has an interest in these proceedings.

2. The Town has been accorded intervener status in past proceedings involving Interstate Navigation Company, a company which operates ferries between Block Island and the mainland.

4. The Town has a substantial interest in the outcome of these proceedings and claims a right to intervene as well as interests of such nature that intervention is necessary or appropriate.

5. The Town's interests will be directly affected and the Town is not adequately represented by existing parties as to which the Town may be bound by the Commission's action in the proceeding.

6. The Town is in the process of conducting a preliminary review of the Fast Ferry's application and the Town council will be meeting to vote on the position to be advanced in these proceedings.

7. If permitted to intervene, the Town intends to conduct discovery, cross-examine witnesses sponsored by other parties, offer exhibits and present direct testimony.

8. Intervention by the Town is in the public interest. The Town's participation as an intervenor will provide the Commission with diverse and local input regarding the application. No other party can adequately represent the unique interests of the Town in this proceeding.

9. Copies of all notices, pleadings, correspondence and other filings should be served upon the following:

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For the reasons above, the Town requests that the Commission grant its Motion to Intervene.

Respectfully submitted,
TOWN OF NEW SHORHAM
By its attorneys,
Merolla & Accetturo

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Dated: August 26, 2013