

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

In re: The Narragansett Electric Co. d/b/a National Grid
Solicitations of Long-Term Contracts for Renewable
Energy and Renewable Energy Certificates (RECs),
Pursuant to R.I. Gen. Laws § 39-26.1-1 et seq.

Docket No. 4822

**MOTION TO INTERVENE OF
FIRSTLIGHT POWER RESOURCES, INC.**

Pursuant to Section 1.13 of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission (“PUC” or “Commission”) and the Procedural Schedule issued on May 10, 2018, in the above-captioned docket, FirstLight Power Resources, Inc. (“FirstLight”) hereby moves for leave to intervene in this proceeding. As grounds for this motion, FirstLight states:

1. FirstLight is a Delaware corporation with hydropower, energy storage, and solar generation assets in Massachusetts and Connecticut. FirstLight has a principal office at 111 South Bedford Street, Suite 103, Burlington, MA 01803.
2. FirstLight’s hydro facilities in New England produce over 690,000 MWh of emissions free generation, reducing the region’s carbon footprint by more than 780,000 tons annually. FirstLight also owns and operates Northfield Mountain pumped hydro storage station and Rocky River pumped hydro storage station, which are respectively the largest and third largest energy storage facilities in New England.

Background

3. On April 23, 2018, The Narragansett Electric Company d/b/a National Grid (“National Grid” or “the Company”) filed a proposed Request for Proposals (“RFP”) for review and approval by the PUC pursuant to the Long-Term Contracting Standard for Renewable

Energy, R.I. Gen. Laws § 39 26.1-1 *et seq.* (“LTCS”). The PUC will determine whether the timetable and method for the solicitation under proposed RFP is “a reasonable method of soliciting proposals from renewable-energy developers.” R.I. Gen. Laws § 39 26.1-3; Rules and Regulations Governing Long-Term Contracting Standards for Renewable Energy (“LTCS Rules”) § 4.2.

4. On May 10, 2018, the PUC issued a procedural schedule establishing a deadline of June 7, 2018 to file motions to intervene and comments.

Standard of Review

5. Pursuant to Section 1.13(b) of the PUC Rules of Practice and Procedure, the Commission may permit intervention by “any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate”
6. Such an interest may include one “which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission’s action in the proceeding.” PUC Rule 1.13(b)(2).
7. Such an interest may also include any “interest of such nature that movant’s participation may be in the public interest.” PUC Rule 1.13(b)(3).

Argument

8. FirstLight was a bidder in the concurrent Section 83C solicitation initiated under the Massachusetts 2016 Energy Diversity Act, in which the Rhode Island Office of Energy Resources (“OER”) and Department of Public Utilities and Carriers (“DPUC”) participated. In that coordinated procurement, FirstLight included a portion of the storage capability of Northfield Mountain Pumped Hydro Station in the Revolution Wind

bid, which was selected by OER and DPUC for further contract negotiation under the Affordable Clean Energy Security Act, R.I. Gen. Laws § 39-31.

9. FirstLight has a substantial and direct economic interest in the timetable and methodology of solicitation of long-term contracts for renewable energy as a potential participant in the currently proposed solicitation, because FirstLight's pumped hydro storage resources can be paired a renewable resource procured under this and any future solicitation conducted by Rhode Island or other New England states to achieve even greater economies of scale for ratepayers.
10. As the owner and operator of the largest pumped hydro storage resources in New England, FirstLight's interests are unique, and no other party can adequately represent those interests.
11. FirstLight can also provide testimony and supporting evidence that will not otherwise be available in this docket and which will be necessary for the PUC to fully evaluate the Company's proposed RFP. Thus, the PUC should find that FirstLight's expertise and interest is of a nature that its participation is necessary to this docket.
12. Therefore, FirstLight should be permitted to intervene and fully participate in these proceedings.

Communications

13. FirstLight requests electronic service of all notices, testimony, pleadings, and correspondences pertaining to this proceeding to the following persons identified below:

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WHEREFORE, for all of the foregoing reasons, FirstLight respectfully requests that the Commission grant its Motion to Intervene and that it be designated a full party in Docket 4822.

Respectfully submitted

**FIRSTLIGHT POWER
RESOURCES, INC.**

By its attorney,


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Dated: June 7, 2018

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

In re: The Narragansett Electric Co. d/b/a National Grid) Solicitations of Long-Term Contracts for Renewable) Energy and Renewable Energy Certificates (RECs),) Pursuant to R.I. Gen. Laws § 39-26.1-1 et seq.)		Docket No. 4822
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NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.4 of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission, please enter my appearance on behalf of FirstLight Power Resources, Inc.


Respectfully submitted


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Dated: June 7, 2018

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of June, 2018, the original and nine (9) copies were mailed by first class United States mail to the Clerk of the Rhode Island Public Utilities Commission. In addition, electronic copies of the foregoing documents were served via email to the service list in this docket.


Edward D. Pare, Jr.

Docket No. 4822 -- National Grid – RFP for Long-Term Contracting for Renewable Energy and RECs up to 400 MW

Service List updated 6/7/18

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