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December 12, 2006

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Bluewater Wind – Docket No. 3765 – Motion to Intervene

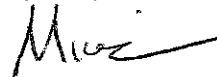
Dear Luly:

This office represents Bluewater Wind.

Enclosed are an original and nine copies of Bluewater Wind's Motion to Intervene in Docket No. 3765.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg
BW:Massaro
cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID :
RENEWABLE ENERGY : DOCKET No. 3765
STANDARD PROCUREMENT PLAN :

MOTION OF BLUEWATER WIND, LLC
TO INTERVENE AS A FULL PARTY

Now comes Bluewater Wind LLC, (Bluewater Wind), by its undersigned counsel, and pursuant to Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission (Commission), hereby moves to intervene as a full party in this matter.

The Division of Public Utilities and Carriers (Division), through its counsel, has stated that it has no objection to the granting of this motion.

1. Bluewater Wind is a developer of wind energy projects across the country and is committed to clean, stable-priced, renewable electricity.
2. Bluewater Wind hopes to develop a wind park off the coast of Rhode Island and therefore has a special interest in this renewable energy standard docket. Wind is within the renewable energy definition of the applicable statute and regulations.
3. The items that Bluewater Wind anticipates addressing in this docket include, but are not limited to, (a) concerns Bluewater Wind has regarding long term contracts, which are a critical component in financing the construction of new wind energy sources, (b) consideration of how agreements with obligated entities to accept alternative compliance payments can further the development of renewable energy sources and achieve the purpose of the renewable energy standard and how this impacts the procurement plan, and (c) issues related to how collaboration among (i) the Office of Energy Resources, (ii) the Division of Public Utilities,

Bluewater Wind

(iii) the trustees of the Renewable Energy Development Fund, (iv) the distribution company, and (v) other interests and parties will be handled to facilitate the ability of companies such as Bluewater Wind to build renewable energy projects that will enable National Grid to comply with the Renewable Energy Standard in Rhode Island.

4. Bluewater Wind is concerned that some of the above considerations were not fully addressed in National Grid's procurement process filing, and Bluewater Wind will be filing testimony to explain its concerns in greater detail.

5. As these concerns are unique to Bluewater Wind and there are no other wind energy project developers to our knowledge participating in this docket, Bluewater Wind believes that its participation as a full party intervenor in this docket is appropriate because its interests would not otherwise be adequately represented.

6. Bluewater Wind is prepared to abide by the previously established procedural schedule.

7. Commission Rule 1.13 provides in pertinent part that "any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission." The Rule goes on to further state that such a right or an interest may be:

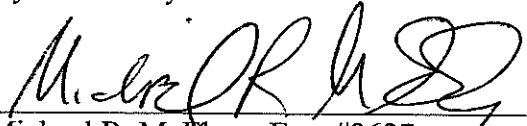
"an interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission's action in the proceeding."

10. Rule 1.13 also provides that such right or interest may be "any other interest of such nature that movant's participation may be in the public interest."

Bluewater Wind

Accordingly, Bluewater Wind, pursuant to Rule 1.13, hereby moves for intervention as a full party in this matter.

Respectfully submitted,
Bluewater Wind LLC
By its attorney

 12-12-06
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Bluewater Wind

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of December, 2006, I mailed a true copy of the foregoing by first class mail to the service list in this docket.


Theresa M. Gallo