

Attorneys at Law

RichMay
celebrating **75** years

Rich May, P.C. 176 Federal Street, Boston, MA 02110

Erica P. Bigelow, Esq.
Direct Dial: (617) 556-3877
E-mail: ebigelow@richmaylaw.com

October 29, 2012

BY FEDERAL EXPRESS

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Re: Issuance of Advisory Opinion to the Energy Facility Siting Board
Regarding Narragansett Electric Co. d/b/a National Grid's Application to
Construct and Alter Transmission Lines and Facilities (Interstate
Reliability Project) – Docket No. 4360

Dear Ms. Massaro:

Enclosed for filing in the above-captioned matter please find ISO New England's ("ISO") Motion to Intervene.

Please call me if there are any questions.

Sincerely,



Erica P. Bigelow

Enclosure

cc: Cynthia Wilson-Frias, Esq.,
Kevin Flynn, Esq. (via e-mail)
Service List (Dkt. 4360)

**STATE OF RHODE ISLAND
AND PROVIDENCE PLANTATIONS**

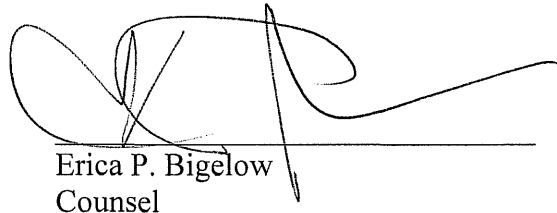
PUBLIC UTILITIES COMMISSION

DOCKET No. 4360

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of Section 1.7 (d) of the Public Utilities Commission's Rules of Practice and Procedure.

Dated at Boston, Massachusetts this 29th day of October, 2012.



Erica P. Bigelow
Counsel

Of Counsel for
ISO New England, Inc.

**STATE OF RHODE ISLAND AND
PROVIDENCE PLANTATIONS**

PUBLIC UTILITIES COMMISSION

DOCKET No. 4360

**In re: Issuance of Advisory Opinion to the Energy
Facility Siting Board Regarding Narragansett
Electric Company d/b/a National Grid's Application
to Construct and Alter Major Energy Facilities
(Interstate Reliability Project)**

**MOTION TO INTERVENE OF
ISO NEW ENGLAND INC.**

Pursuant to Section 1.13 of the Commission's Rules of Practice and Procedure, ISO New England Inc. (the "ISO") hereby requests the Public Utilities Commission ("PUC") for leave to intervene as a party in the above proceedings, stating in support thereof the following:

1. The ISO, a private, non-profit corporation which serves as the independent system operator of the New England bulk power grid and as the regional transmission organization for the New England region, is requesting intervenor status in the above-captioned proceeding because it has substantial interests that may be affected by the proceeding. The ISO is responsible for the day-to-day reliable operation of the New England region's bulk electric generation and transmission system and is charged by the Federal Energy Regulatory Commission to plan for and ensure a reliable bulk power system for New England. The outcome of this proceeding will significantly affect the reliability of the electric system in New England, and the ISO therefore has significant interests at stake in this proceeding.

2. The PUC opened this docket to, among other things, provide an advisory opinion to the Rhode Island Energy Facilities Siting Board (pursuant to the October 12, 2012 Notice of Designation to an Agency to Render an Advisory Opinion) regarding the proposal of

Narragansett Electric Company (“Narragansett” or the “Company”) to construct two new 345 kV transmission lines; relocate, reconstruct and, in some cases, reconductor existing 345 kV and 115 kV transmission lines; and reconstruct an existing switching station (the “Project”). All such work is to be done in the municipalities of Burrillville and North Smithfield.

3. Pursuant to the Notice of Public Hearing, setting forth a procedural schedule, dated October 22, 2012, the ISO requests that it be permitted to intervene as a party at this time in order to adequately represent and protect its interests in this proceeding. The ISO is substantially and specifically affected by this proceeding, because it is responsible for the reliability of electric supply and transmission in the New England control area, which includes Rhode Island. The Project will have a significant impact on the reliability of the New England electric system. Therefore, ISO has substantial interests that may be adversely affected by the outcome of this proceeding and because no other party shares such responsibility, the ISO is specifically affected and no other party can adequately represent the ISO’s interests in this regard.

4. This proceeding affects the ISO’s interests as described above, and the ISO’s interest in this matter cannot be adequately addressed or represented by any other party. Further, the ISO’s unique expertise in the area of electric generation, transmission, system reliability, and bulk power system planning operation will assist the EFSB in the development of a comprehensive record and in resolving issues in this docket. Consequently, the ISO’s participation in this proceeding will help ensure the development of a comprehensive record,

while affording the ISO the opportunity to maximize its ability to fulfill its obligations as noted above.

5. If granted leave to intervene, the ISO's intention currently is to participate in this proceeding primarily by presentation of testimony or other relevant evidence, or issuing or responding to discovery and by filing briefs and comments, as may be appropriate. If granted leave to intervene, the ISO requests that copies of all materials filed in this docket be served on the ISO as specified in paragraph 6 below.

6. All communications and correspondence for this proceeding should be directed to:

Eric Krathwohl, Esq./Erica Bigelow, Esq.,
Rich May, P.C.
176 Federal Street, 6th Floor
Boston, MA 02110-2223
(617) 556-3857 (Telephone)
(617) 556-3890 (Fax)
e-mail: ekrathwohl@richmaylaw.com
ebigelow@richmaylaw.com

and

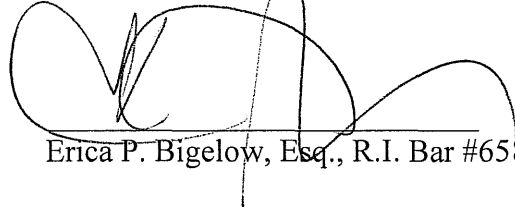
Kevin Flynn, Esq.
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
kflynn@iso-ne.com
T (413) 535-4177
F (413) 535-4379

WHEREFORE, ISO New England Inc. requests that it be permitted to intervene in these proceedings as a party.

Respectfully submitted,

ISO New England Inc.

By:

A handwritten signature in black ink, appearing to read 'Erica P. Bigelow', is written over a horizontal line.

Erica P. Bigelow, Esq., R.I. Bar #6584

Rich May, PC
176 Federal Street, 6th Floor
Boston, MA 02110-2223
(617) 556-3857 (Telephone)
(617) 556-3890 (Fax)
E-mail: ebigelow@richmaylaw.com

Date: October 29, 2012