

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

September 16, 2014

**Re: Docket 4483 In re. Petition of Wind Energy Development, LLC and ACP Land, LLC  
Relating to Interconnection**

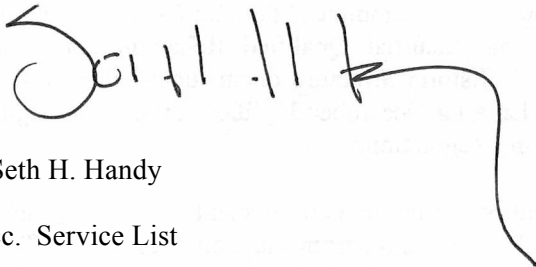
Dear Ms. Massaro,

Petitioners write to respond to National Grid's settlement proposal filed on September 12. Petitioners appreciate National Grid's agreement to itemize and true up the cost of interconnection studies for non-residential projects where the actual costs exceed the statutory amount, and to itemize the actual costs of interconnection and true them up with prepaid, estimated costs. These agreements support the equitable results contemplated by the statute and the Interconnection Tariff.

Beyond the positions outlined in Petitioners' brief (i.e., another PLR is not necessary, National Grid's burden), Petitioners raise two concerns with the proposal to resolve the "tax issue" as also addressed in Petitioners' August 20 letter to National Grid. First, if National Grid is ordered to request any private letter rulings, Petitioners ask to have final say over the contents of the requests, since Petitioners represent the interests that actually pay the tax and the proper wording of the requests could have a significant impact on the PLRs. Second, Petitioners request a definite schedule so that the requests will be prepared, filed and resolved as soon as possible.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Seth H. Handy", with a long, sweeping underline that extends to the right.

Seth H. Handy

cc. Service List