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Gerald J. Petros
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August 14, 2015

Via Electronic and Regular Mail

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

Re: Copenhagen Wind Farm - Docket No. 4574

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter are an original and nine copies of the following documents:

- 1) Entry of Appearance of Gerald J. Petros on behalf of Copenhagen Wind Farm, LLC; and
- 2) Copenhagen Wind Farm, LLC's Motion to Intervene.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Gerald J. Petros (AMIC)".

Gerald J. Petros

GJP:jlh

Enclosures

cc: RIPUC Service List (electronically only)

► ALBANY ► BOSTON ► CONCORD ► HARTFORD ► NEW YORK ► PROVIDENCE

HINCKLEY, ALLEN & SNYDER LLP, ATTORNEYS AT LAW

#53452901

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: REVIEW OF POWER PURCHASE
AGREEMENT – COPENHAGEN WIND FARM, LLC
PURSUANT TO R.I. GEN. LAWS § 39-26.1-1 et seq.

DOCKET NO.: 4574

ENTRY OF APPEARANCE

I, Gerald J. Petros, hereby enter my appearance on behalf of Copenhagen Wind Farm,
LLC in the above-captioned docket.

COPENHAGEN WIND FARM, LLC,

By its Attorney,

/s/ Gerald J. Petros
Gerald J. Petros, Esq., #2931
Hinckley, Allen & Snyder LLP
100 Westminster Street, Suite 1500
Providence, RI 02903
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gpetros@hinckleyallen.com

DATED: August 14, 2015

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above document was distributed to the Service List for Docket 4574 (set for the below) by email (or as otherwise set forth on the Service List) on August 14, 2015.

/s/ Gerald J. Petros _____

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: REVIEW OF POWER PURCHASE
AGREEMENT – COPENHAGEN WIND FARM, LLC
PURSUANT TO R.I. GEN. LAWS § 39-26.1-1 *et seq.*

DOCKET NO.: 4574

COPENHAGEN WIND FARM, LLC'S MOTION TO INTERVENE

Copenhagen Wind Farm, LLC, Inc. (“Copenhagen”) moves to intervene in this docket pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission (the “Commission”) Rules of Practice and Procedure. The Commission should grant this motion for the following reasons:

1. This is a proceeding under R.I. Gen. Laws § 39-26.1-1 *et seq.* (the “Long-Term Contracting Standard for Renewable Energy”) to review the Power Purchase Agreement (“PPA”) entered into between Copenhagen and The Narragansett Electric Company d/b/a National Grid (“National Grid”).

2. National Grid filed the PPA with the Commission on August 3, 2015. The Commission’s review of the PPA is to determine whether “(1) The Contract is commercially reasonable; (2) The requirements for the annual solicitation have been met; and (3) The contract is consistent with the purposes of this chapter.” R.I. Gen. Laws § 39-26.1-3(b).

3. On August 7, 2015, the Commission issued a Memorandum setting a procedural schedule, which set August 14, 2015 as the deadline for any motions to intervene.

4. The Commission should grant a motion to intervene so long as the party seeking to intervene has “[a]n 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.” Commission Rule 1.13(b).

5. A motion to intervene need only “set out clearly and concisely facts from which the nature of the movant’s . . . interest can be determined, the grounds of the proposed intervention, and the position of the movant in the proceeding.” Commission Rule 1.13(c).

6. Copenhagen is developing an 80MW wind farm in Denmark, New York.

7. National Grid issued a solicitation for renewable energy projects to enter into long-term contracts on July 1, 2014.

8. Copenhagen responded to the solicitation on August 5, 2014.

9. National Grid selected Copenhagen’s wind farm for a long-term contract as a result of that solicitation.

10. Copenhagen and National Grid proceeded to negotiate the terms of the PPA and executed it on July 24, 2015.

11. In previous PPA review proceedings, the Commission has recognized that all parties to the PPA have an interest and should be allowed to intervene. *See* Docket No. 4437 (allowing Champlain Wind, LLC to intervene); Docket No. 4319 (allowing Black Bear Development Holdings, LLC to intervene); Docket No. 4265 (allowing Orbit Energy Rhode Island LLC to intervene).

12. Copenhagen, as a party to the PPA under review by the Commission, will clearly be bound by the decision in this matter.

13. Copenhagen needs to participate in this proceeding and provide its perspective as to why the Commission should approve this PPA; there is no other party that can adequately represent Copenhagen’s position in this docket.

14. Copenhagen will advocate for approval of the PPA.

15. Copenhagen is knowledgeable about all the terms of the PPA and National Grid's solicitation process that led to the PPA.

16. Copenhagen will provide valuable information as to the PUC's three areas of inquiry: (1) the commercial reasonableness of the project, (2) the facts regarding National Grid's annual solicitation for long-term contracts for renewable energy, and (3) whether the PPA is consistent with the purposes of the Long-Term Contracting Standard for Renewable Energy.

17. Additionally, it is in the public interest that all parties to the PPA participate in this proceeding to answer any and all questions raised by the Commission or any other parties to this docket.

Wherefore, Copenhagen respectfully requests that the PUC grant this Motion to Intervene and allow Copenhagen to participate as a party to this proceeding.

COPENHAGEN WIND FARM, LLC,

By its Attorney,

/s/ Gerald J. Petros
Gerald J. Petros, Esq. #2931
Hinckley, Allen & Snyder LLP
100 Westminster Street, Suite 1500
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DATED: August 14, 2015

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/s/ Gerald J. Petros _____

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