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July 28, 2016

BY EMAIL AND FEDEX

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

*In re: The Narragansett Electric Company d/b/a National Grid
Request for approval of a gas capacity contract and cost recovery
pursuant to R.I. Gen. Laws § 39-31-1 to 9
Docket No. 4627*

Dear Ms. Massaro:

Please find enclosed for filing in the above-captioned proceeding, an original and three (3) copies of the *Motion for Intervention of Exelon Generation Company, LLC*.

Please do not hesitate to call if you have any questions in regard to the enclosed.

Very truly yours,

/s/ James William Litsey

James William Litsey

Enclosures

cc: Service List

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

IN RE: THE NARRAGANSETT ELECTRIC :
COMPANY d/b/a NATIONAL GRID REQUEST :
FOR APPROVAL OF A GAS CAPACITY : DOCKET NO. 4627
CONTRACT AND COST RECOVERY :
PURSUANT TO R.I. GEN. LAWS § 39-31-1 TO 9 :

**MOTION FOR INTERVENTION OF
EXELON GENERATION COMPANY, LLC**

Pursuant to Section 1.13 of the Rhode Island Public Utilities Commission (“Commission” or “RIPUC”) Rules of Practice and Procedure and the Notice of Pre-Hearing Conference, Intervention Deadline, and Public Comment Hearing issued by the RIPUC on July 8, 2016, the Exelon Generation Company, LLC (“ExGen”), by counsel, hereby files this Motion for Intervention (“Motion”) in the above-captioned proceeding. ExGen has a direct interest in this proceeding and its intervention in this matter is appropriate and in the public interest. Accordingly, ExGen respectfully requests its Motion be granted. In support thereof, ExGen states the following:

1. On June 30, 2016, The Narragansett Electric Company d/b/a National Grid (“National Grid”) filed with the Commission a Request for Approval of a Gas Capacity Contract and Cost Recovery provision (“Request”). The proposed contract is between National Grid and Algonquin Gas Transmission Company LLC (“Algonquin”) for natural gas transportation capacity and storage services on Algonquin’s Access Northeast Project. National Grid filed supporting testimony and related exhibits with its Request.

2. On July 8, 2016, the Commission issued its “Notice of Pre-Hearing Conference, Intervention Deadline, and Public Comment Hearing” in the above-captioned proceeding, setting a Pre-Hearing Conference and allowing, *inter alia*, for timely interventions in the proceeding on or before July 29, 2016.

3. ExGen is an indirect, wholly-owned subsidiary of Exelon Corporation, a North American energy company with several merchant subsidiaries in addition to ExGen, as well as regulated utility subsidiaries in Pennsylvania (PECO Energy Company), Illinois (Commonwealth Edison Company) and Maryland (Baltimore Gas and Electric Company). ExGen has market-based rate authority from the Federal Energy Regulatory Commission and is a buyer and seller of wholesale electricity and capacity. ExGen also has the privilege of conducting business in Rhode Island and owns and operates several electric generation facilities in New England, including the Mystic Generating Station in Everett, Massachusetts. Mystic 8 and 9 are six natural gas units, which can produce 690.9 megawatts.

4. The principal place of business of ExGen is:

Exelon Generation Company, LLC
100 Constellation Way, Suite 600C
Baltimore, MD 21202

5. Copies of all pleadings, notices, and correspondence in this docket should be sent to the undersigned counsel for ExGen at the following addresses:

Melissa Lauderdale
Exelon Business Services Company, LLC
100 Constellation Way, Suite 500C
Baltimore, MD 21202
Telephone: 410-470-3582
melissa.lauderdale@exeloncorp.com

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Particularly, ExGen respectfully requests that service be made to its business contact, Melissa

Lauderdale, with an electronic courtesy copy, if possible, to be served on James W. Litsey.

6. As noted in National Grid's Request, the Rhode Island General Assembly has declared:

The state and New England face significant short and long-term energy system challenges that may undermine the reliable operation of the bulk electric system and spur unsustainable levels of price volatility, and that these challenges may have a substantial impact on energy affordability for ratepayers and undermine the economic competitiveness of our state by serving as a detriment to capital investment and job growth. (Request at Attachment 1, Page 1 of 5.)

7. ExGen participates in various aspects of the energy markets in New England and has substantial interests that may be affected by this proceeding in fundamental ways.

Specifically, as natural gas powered facilities operating in New England, Mystic 8 and 9 are exclusively supplied from the adjacent Distrigas terminal. They cannot be served from any existing pipeline. Additionally, Mystic 8 and 9 are merchant facilities that offer their energy on a daily basis into the Independent System Operator-New England ("ISO-NE") administered energy market, where they must compete with other power generators, including gas-fired units connected to the natural gas pipeline system. The inherent subsidization of competing gas-fired generators within ISO-NE that are connected to the pipeline, which approval of National Grid's Request would effectuate, will cause unique competitive harm to Mystic 8 and 9. Indeed, ExGen is not aware any other party to the proceeding that will be potentially harmed in a similar manner.

8. Intervention in this and other Commission proceedings is governed by Rule 1.13 of the Commission's Rules of Practice and Procedure. Rule 1.13 (b) states, Rule 1.13(b) states:

Subject to the provisions of these rules, 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. Such right or interest may be:

(1) A right conferred by statute.

(2) 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.

(3) Any other interest of such nature that movant's participation may be in the public interest.

9. National Grid's proposal in this proceeding has the clear potential to impact competitiveness of the natural gas capacity and wholesale energy markets in New England including Rhode Island. The ramifications of the RIPUC's decision in this matter will likely be felt by all electricity generators in the region. For this reason Exelon has a direct interest in the outcome of the proceeding, which cannot be adequately represented by any other party.

10. Additionally, ExGen's participation in this proceeding will be in the public interest. ExGen's timely intervention will not impair the orderly and prompt conduct of the proceeding. Rather, ExGen's experience and perspective on the issues implicated by the National Grid Request will aid in developing a full and complete record and allow for the Commission's proper and informed resolution of the issues.

11. Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.

12. ExGen, therefore, respectfully requests the right to participate in this proceeding, receive copies of all pleadings, discovery requests and responses, other documents, and to file briefs in accordance with a procedural schedule established by the Commission. ExGen notifies the Commission that it plans to only participate in briefing, if scheduled, and will not be putting on a witness or otherwise be submitting testimony in the proceeding.

WHEREFORE, for the foregoing reasons, ExGen respectfully requests that (1) its Motion for Intervention be granted, and (2) that the Commission grant any such other relief as deemed just and reasonable under the circumstances.

Respectfully submitted,

/s/ James William Litsey

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Dated: July 28, 2016

Attorney for Exelon Generation Company, LLC

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.4 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, please enter my appearance on behalf of Exelon Generation Company, LLC in the above captioned proceeding.

Respectfully submitted,

/s/ James William Litsey

James William Litsey, Esq.
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Dated: July 28, 2016

CERTIFICATE OF SERVICE

On this 28th day of July, 2016, I sent this original pleading and three (3) copies to the Rhode Island Public Utilities Commission and sent a true copy of the document by electronic mail or first-class mail to the parties on the Docket 4627 Service List as of July 28, 2016.

/s/ James William Litsey

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