

August 5, 2016

**BY HAND DELIVERY AND ELECTRONIC MAIL**

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

**RE: Docket 4636 – Joint Petition of ISM Solar Development, LLC and  
Pascoag Utility District  
National Grid Intervention**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> I have enclosed ten copies of National Grid's Motion to Intervene in the above-referenced docket.

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4636 Service List  
Leo Wold, Esq.  
Steve Scialabba, Division

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

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Joanne M. Scanlon

August 5, 2016  
Date

**ISM Solar Development & Pascoag Utility District – Docket No. 4636**  
**List updated 8/5/16**

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

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**IN RE: JOINT PETITION OF ISM SOLAR )  
DEVELOPMENT, LLC, AND THE PASCOAG )  
UTILITY DISTRICT )**

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Docket No. 4636

**NATIONAL GRID’S MOTION TO INTERVENE**

Pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission’s (PUC) Rules of Practice and Procedure, National Grid<sup>1</sup> submits this motion to intervene in this docket. As grounds for this motion, National Grid states as follows:

1. In this docket, ISM Solar Development, LLC (ISM) and The Pascoag Utility District (PUD) (collectively, the Petitioners) filed a petition (Petition) seeking the PUC’s approval of a settlement regarding interconnection under section 9.2 of the Company’s Standards for Connecting Distributed Generation, RIPUC No. 2078 (Tariff). Specifically, the settlement involves interconnection service for a proposed 2 MW solar system planned for installation adjacent to 600 Broncos Highway in Burrillville, Rhode Island (Project). Petitioners have proposed that if ISM interconnected with PUD for station service and provided 0.5 megawatts of power to PUD at an acceptable rate and on terms acceptable to PUD, PUD would allow ISM to interconnect with National Grid to access National Grid-administered programs for the balance of the Project’s generation. Petition at p. 1.

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

2. National Grid's interest is directly affected by the Petitioners' request because Petitioners seek to interconnect with National Grid and participate in the Company's administered programs.
3. National Grid will be bound by the PUC's action in this proceeding to the extent that Petitioners' request for approval to interconnect with National Grid and participate in the Company's programs is granted.
4. Petitioners are private parties who will not adequately represent National Grid's interests in this proceeding.
5. National Grid's interests in this proceeding are in the public interest because its customers pay for the administered programs to which Petitioners seek access.
6. National Grid has no objection to Petitioners' request in this docket so long as National Grid receives full recovery for any related costs in connection with ISM's participation in the Company's Renewable Energy Growth Program, Net Metering Program, or any program administered by National Grid.
7. National Grid has discussed its position with Petitioners.

**WHEREFORE**, National Grid respectfully requests the following:

1. That the PUC grant National Grid's request to intervene in this docket;
2. That National Grid receive full recovery for any related costs in connection with ISM's participation in the Company's Renewable Energy Growth Program, Net Metering Program, or any program administered by National Grid should the PUC approve Petitioners' request for ISM to interconnect with National Grid to access National Grid administered programs for the balance of the Project's generation; and
3. Any other relief the PUC deems reasonable and appropriate.

**THE NARRAGANSETT ELECTRIC  
COMPANY, d/b/a NATIONAL GRID**

By its attorney,



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August 5, 2016