

February 24, 2017

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4688 – Block Island Power Co. - Petition for Declaratory Judgment
National Grid Intervention**

Dear Ms. Massaro:

On behalf of National Grid,¹ 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 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4688 Service List
Leo Wold, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid.

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

IN RE: PETITION FOR DECLARATORY :
JUDGMENT FILED BY BLOCK ISLAND : **DOCKET NO. 4688**
POWER COMPANY :

MOTION TO INTERVENE OF
THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID

Pursuant to Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission (PUC), National Grid¹ respectfully files this Motion to Intervene in Docket No. 4688. In support of this Motion, National Grid states the following:

INTRODUCTION

1. On January 31, 2017, Block Island Power Company (BIPCo.) filed a Petition for Declaratory Judgment (Petition) with the PUC pursuant to PUC Rule 1.10(c) and R.I. Gen. Laws § 42-35-8. In its Petition, BIPCo. requests that the PUC issue a judgment declaring that the costs associated with the interconnection of BIPCo. with the submarine transmission cable that will connect Block Island to the mainland, and the costs to purchase a back-up transformer for the new BIPCo. substation must be socialized to all electric distribution ratepayers in Rhode Island pursuant to § 39-26.1-7(d), and not imposed solely on BIPCo. and its ratepayers.

2. On February 8, 2017, the PUC established the above-referenced docket to review BIPCo.'s Petition. On February 17, 2017, the PUC issued a Notice of Filing, to be published February 21, 2017, and set a February 24, 2017 deadline for interventions in this proceeding.

¹ The Narragansett Electric Company d/b/a National Grid (referred to herein as the Company or National Grid).

3. Pursuant to PUC Rule 1.15(b), National Grid contacted BIPCo. and the Division of Public Utilities and Carriers (the Division) to determine whether either of these had an objection to National Grid's proposed intervention in this Docket. Both entities replied, through their respective counsel, that they had no objection.

STANDARD

4. Intervention in PUC proceedings is governed by PUC Rule 1.13. Pursuant to Rule 1.13(b), upon motion "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."

5. It is appropriate for the PUC to grant motions for intervention where (1) the right of intervention is conferred statute; (2) a movant may be bound and its interests may be directly affected by the proceedings, and those interests are not adequately represented by existing parties; or (3) the movant holds an interest of such nature that the movant's participation may be in the public interest.

MOTION

6. Rhode Island General Laws § 39-26.1-7 authorizes the construction of a small-scale offshore wind demonstration project off the coast of Block Island, including an undersea transmission cable, that interconnects Block Island to the mainland. Subsection (f) of the statute authorizes National Grid to "own, operate, or otherwise participate in such transmission cable project."

7. On January 30, 2015, National Grid purchased the engineering, permits, property rights and other development work for the Block Island Transmission System (BITS) project from Deepwater Wind Block Island Transmission, LLC pursuant to a Transmission Facilities

Purchase Agreement, dated June 30, 2014. National Grid has constructed, and will own the new substation on Block Island, as well as the submarine cable and related facilities necessary to interconnect Deepwater Wind Block Island, LLC and BIPCo. to existing facilities.²

8. National Grid has worked closely with BIPCo. on the proposed interconnection design and the schedule of work, and is in the final stages of construction.

9. National Grid is seeking intervention pursuant to PUC Rule 1.13(b)(2) and (3). In its Petition, BIPCo. makes certain statements regarding National Grid's position with respect to the costs for the interconnection and purchase of the back-up transformer and references a "disagreement" with National Grid. Accordingly, and for the reasons set forth above, National Grid's interests are directly affected by this proceeding, are not adequately represented by the existing parties, and the PUC's decision in this proceeding may be binding on National Grid.

10. In addition, the public interest would be served by National Grid's intervention in this proceeding because it possesses information concerning the matters to be considered in this proceeding.

² The BITS project also includes a new 34.5KV substation on the mainland that will interconnect the submarine transmission cable with National Grid's existing network, as well as 4 miles of underground infrastructure and upgrades at the existing Wakefield and West Kingston substations.

CONCLUSION

For all of the foregoing reasons, National Grid hereby respectfully requests that the PUC grant its motion to intervene in this proceeding as a full party.

WHEREFORE, the Company respectfully requests that the PUC grant its Motion for Intervention as stated herein.

Respectfully submitted,

NATIONAL GRID

By its attorney,



Jennifer Brooks Hutchinson (RI Bar #6176)
National Grid
280 Melrose Street
Providence, RI 02907
(401) 784-7288

Dated: February 24, 2017

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.

Joanne M. Scanlon

February 24, 2017
Date

**Docket No. 4688 – Block Island Power Co. - Petition for Declaratory Judgment
Service List as of 2/14/17**

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File an original & nine (9) copies w/:	Luly.massaro@puc.ri.gov ;	401-780-2107

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