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June 7, 2018

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

Re: *Docket 4822 – The Narragansett Electric Co. d/b/a National Grid - Solicitations of Long-Term Contracts for Renewable Energy and Renewable Energy Certificates (RECs), Pursuant to R.I. Gen. Laws § 39-26.1-1 et seq.*

Dear Ms. Massaro:

Enclosed please find an original and nine copies of the following:

1. NextEra Energy Resources, LLC's Motion To Intervene in the above captioned docket.

I am also requesting that Brian Murphy, Senior Attorney for NextEra Energy Resources, LLC, be added to the service list. Attorney Murphy's email address is Brian.J.Murphy@nexteraenergy.com.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf
Enclosures
cc: Docket 4822 Service List (*via electronic mail*)

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

**SOLICITATIONS OF LONGTERM CONTRACTS :
FOR RENEWABLE ENERGY AND RENEWABLE :
ENERGY CERTIFICATES (RECs), PURSUANT TO : DOCKET NO. 4822
R.I. GEN. LAWS § 39-26.1-1 ET SEQ. :**

MOTION TO INTERVENE OF NEXTERA ENERGY RESOURCES, LLC

Pursuant to Rule 1.13 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission (“Commission”), NextEra Energy Resources, LLC (“NextEra”) hereby petitions the Commission to intervene in the above-referenced proceeding. In support of this petition, NextEra states as follows:

1. NextEra is a clean energy leader and is one of the largest wholesale generators of electric power in the U.S., with more than 19,000 megawatts (“MW”) of net generating capacity, primarily in 32 states and Canada as of year-end 2017. NextEra, together with its affiliated entities, is the world's largest operator of renewable energy from the wind and sun.
2. NextEra is also developing a number of renewable energy projects in New England. In New England, NextEra’s generation assets include the W.F. Wyman Units 1-3 and Cape Station oil-fired plants in Maine, a controlling interest in the W.F. Wyman 4 oil-fired plant in Maine, a controlling interest in the Seabrook Nuclear Generating Station in New Hampshire, and a 50% interest in the Bellingham gas/oil-fired combined cycle generating facility in Massachusetts. NextEra is primarily a wholesale power generator and marketer, operating power plants and selling the

output to utilities, retail electricity providers, power cooperatives, municipal electric providers, and large commercial and industrial companies.

3. The purpose of this proceeding is to review and approve a draft Request for Proposals (“RFP”) submitted by the Narragansett Electric Company d/b/a National Grid (“National Grid” or “Company”) pursuant to the Long-Term Contracting Standard for Renewable Energy and the “Rules and Regulations Governing Long-Term Contracting Standards for Renewable Energy”.¹ Pursuant to the RFP, National Grid seeks to conduct a “reasonable, open, and competitive method of soliciting proposals for long-term contracts” for up to 400 MW of renewable energy and associated Renewable Energy Credits (“RECs”) and related attributes from newly developed renewable energy resources.
4. Intervention in Commission proceedings is governed by Rule 1.13 of the Commission’s Rules of Practice and Procedure, which 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. (The following may have such an interest: consumers served by the applicant, defendant, or respondent; holders of securities of the applicant, defendant, or respondent.)
- (3) Any other interest of such nature that movant's participation may be in the public interest.

¹ See R.I. Gen. Laws § 39-26.1-1 et seq.; R.I. Gen. Laws § 39-26.1-5(e).

5. As a potential eligible bidder to the RFP, NextEra has a significant interest in the subject matter of this Docket and may be directly affected and bound by the Commission's review and decision. Importantly, NextEra's interests are not adequately represented by the existing parties in this Docket.
6. As a potential eligible bidder, NextEra's participation in this Docket will also be in the public interest. NextEra's knowledge and experience as a generation developer and owner in New England, wholesale marketer, and as a bidder in other New England RFPs, including the recent Tri-State RFP in which Rhode Island was a participant, add significant value to this proceeding. In recognition of NextEra's value to its proceedings, the Commission previously granted intervenor status to NextEra in Docket No. 4764 – In re: The Narragansett Electric Company d/b/a National Grid's Request for Approval of Eight Long-Term Renewable Energy Contracts.

WHEREFORE, NextEra, requests that the Commission grant its Motion to Intervene and party status in this proceeding, and that the Commission grant all other relief it deems meet and just.

NextEra Energy Resources, LLC
By its Attorney,



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Dated: June 7, 2018

CERTIFICATION

I hereby certify that on June 7, 2018, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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