

PARTRIDGE SNOW & HAHN LLP

Christian F. Capizzo
(401) 861-8247
cfc@psh.com

July 16, 2018

VIA EMAIL AND REGULAR MAIL

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

Re: In Re: Docket No. 4822 – SOLICITATION OF LONG-TERM CONTRACTS
FOR RENEWABLE ENERGY AND RENEWABLE ENERGY CERTIFICATES
PURSUANT TO R.I. GEN. LAWS §39-26.1-1

Dear Madame Clerk:

Enclosed please find an original and ten (10) copies of the following document:

- 1. Entry of Appearance on behalf of Weaver Wind, LLC**
- 2. Motion for Intervention**

Please note that an electronic copy of this document has been provided to the service list.

Should you have any questions concerning this filing please contact me at (401) 861-8200.

Thank you for your attention to this matter.

Sincerely,

Christian F. Capizzo

CFC:dad
Enclosures
3341597.1/MTBA-CFC

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

**IN RE: SOLICITATION OF LONG-TERM
CONTRACTS FOR RENEWABLE ENERGY
AND RENEWABLE ENERGY CERTIFICATES
PURSUANT TO R.I. GEN. LAWS §39-26.1-1**

DOCKET No. 4822

**MOTION FOR LATE INTERVENTION
BY WEAVER WIND, LLC**

NOW COMES Weaver Wind, LLC (“Weaver Wind”), and pursuant to Rule 1.13 (a)(b) and (f) of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission (“Commission”), moves that the Commission grant Weaver Wind intervener status as parties in the above-captioned docket for the reasons set forth herein:

1. Weaver Wind is a subsidiary of Longroad Energy Partners, LLC (“Longroad Energy”), a renewable energy company that, directly and through its investment in Longroad Energy Holdings, LLC owns and operates 922 MW of wind and solar projects across the United States in addition to operating and managing 552 MW of wind and solar projects on behalf of third parties.
2. Since 2004, the Longroad team has developed and financed 3.8 GW of utility scale renewable energy projects throughout the United States including projects New England.
3. On April 23, 2018, The Narragansett Electric Company d/b/a National Grid (“National Grid”) filed a proposed Request for Proposals (“RFP”) for review and approval by the Commission pursuant to the Long-Term Contracting Standard for Renewable Energy, R.I. Gen. Laws §39-26.1-1 *et seq.* The Commission will determine whether the timetable and method for solicitation under the proposed RFP is “*a reasonable method of soliciting proposals from renewable energy*”

developers". See R.I. Gen. Laws §39-26.1-1 and the Rules and Regulations Governing Long-Term Contracting Standards for Renewable Energy §4.2.

4. On or about May 10, 2018, the Commission issued a procedural schedule with a hearing set for August 1, 2018.
5. 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."

6. Although pursuant to the procedural schedule, the deadline to file a motion for intervention has passed, late intervention may be granted under Rule 1.3 (f) as long as those granted intervener status "...are bound by the agreements reached in orders entered in the proceedings prior to their intervention...and the Commission will not allow the broadening of issues unless the public interest requires it and no undue prejudice or hardship will result to other parties in the proceeding".

7. Weaver Wind agrees to be bound by the agreements reached in any orders entered in this proceeding. In addition, there will be no undue prejudice or hardship that will result to the other parties in the proceeding should the Commission grant Weaver Wind intervention, as the hearing for this matter is not scheduled to take place until August 1, 2018.
8. Weaver Wind is a subsidiary of Longroad Energy, a wind development company seeking to build onshore utility-scale wind and solar energy projects throughout New England including Rhode Island.
9. Weaver Wind has unique understanding of onshore utility-scale wind and solar energy projects given its team's experience in developing utility scale renewable energy projects throughout the United States. Weaver Wind will be able to provide testimony and supporting evidence that will not otherwise be available in this docket and which will be necessary for the Commission to fully evaluate the proposed RFPs.
10. As a potential eligible bidder to the RFP, Weaver Wind has a substantial and direct economic interest in ensuring the timetable and methodology of solicitation of long-term contracts for renewable energy projects is appropriately implemented by National Grid and the Commission. Importantly, Weaver Wind's interests are not adequately represented by the existing parties in this docket.
11. As a potential eligible bidder to the RFP, Weaver Wind has a unique and significant interest in the subject matter of this docket as it may be directly affected and bound by the Commission's review and decision.

12. Weaver Wind's intervention will contribute to a more competitive and rigorous bidding process that will ensure that Rhode Island consumers get the best possible prices as a result of this process.
13. As a potential eligible bidder to the RFP, Weaver Wind's participation in this docket will be consistent with positions that are in the public interest as set forth under Rhode Island Law and public policies.
14. It is therefore necessary and appropriate to grant Weaver Wind the right to intervene in this proceeding

WHEREFORE, Weaver Wind, 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.

Respectfully Submitted

On Behalf of Weaver Wind, LLC,




Christian F. Capizzo, Esq.
Partridge Snow & Hahn, LLP
40 Westminister St., Suite 1100
Providence, RI 02903
(401) 861-8200
cfc@psh.com

Dated: July 16, 2018

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2018, I sent a copy of the within to all the parties set forth on the attached Service List by electronic mail and copies to Ms. Luly Massaro, Commission Clerk, by electronic mail and regular mail.



Christian F. Capizzo, Esq.

3341584.1/MTBA-CFC

Docket No. 4822 -- National Grid -- RFP for Long-Term Contracting for Renewable Energy and RECs up to 400 MW

Service List updated 6/7/18

Name/Address	E-mail Distribution	Phone
National Grid John K. Habib, Esq. Keegan Werlin LLP 99 High Street, Suite 2900 Boston, MA 02110	jhabib@keeganwerlin.com ;	617-951-1354
	kmahoney@keeganwerlin.com ;	
	Laura.Bickel@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
Jon Hagopian, Esq. Division of Public Utilities & Carriers 89 Jefferson Blvd. Warwick, RI 02888	Jon.hagopian@dpuc.ri.gov ;	401-784-4775
	John.bell@dpuc.ri.gov ;	
	Jonathan.Schrag@dpuc.ri.gov ;	
	Al.contente@dpuc.ri.gov ;	
Ellen Cool Levitan & Associates	egc@levitan.com ;	
James Crowley, Esq. Conservation Law Foundation 235 Promenade St., Suite 560 Providence, RI 02908	jcrowley@clf.org ;	401-228-1905
	jelmer@clf.org ;	
NextEra Energy Resources, LLC Joseph A. Keough Jr., Esquire Keough + Sweeney, Ltd. Brian J. Murphy Esq. NextEra Energy Resources, LLC	jkeoughjr@keoughsweeney.com ;	401-724-3600
	Brian.J.Murphy@nexteraenergy.com ;	
File an original & 9 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2017
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Linda.george@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
Andrew Marcaccio, Esq., OER	Andrew.Marcaccio@doa.ri.gov ;	
Christopher Kearns, OER Nicholas Ucci, OER Carol Grant, Commissioner	Christopher.Kearns@energy.ri.gov ;	
	Nicholas.Ucci@energy.ri.gov ;	
	Carol.Grant@energy.ri.gov ;	
Sebastian Hald Buhl, Orsted	sehbh@orsted.com ;	857-260-8362
Frederick Zalzman, Orsted	FRZAL@orsted.com ;	617-792-4333
Liam Paskvan	lpaskvan@PierceAtwood.com ;	207-791-1306
Michelle Carpenter, Green Development	mc@green-ri.com ;	401-295-4998
Buzz Becker, Hexagon Energy	bbecker@hexagon-energy.com ;	434-326-4623
Seth Handy, Esq.	seth@handylawllc.com ;	401-626-4839
Ram Seetharaman, Solar Micronics	ramsee72@gmail.com ;	
Ganesan Visvabharathy, Solar Micronics	visva@solar-micronics.co ;	
Yolanda Yolanda, Solar Micronics	yolanda@solar-micronics.co ;	
Jamie Dickerson, NECEC	jdickerson@necec.org ;	
Janet Besser, NECEC	jbesser@necec.org ;	

David Peloquin, Eversource	david.peloquin@eversource.com ;	860-665-3554
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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

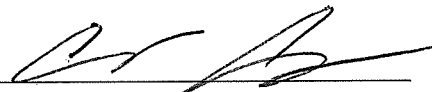
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DOCKET No. 4822

NOTICE OF APPEARANCE

Pursuant to 1.4 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, please enter my appearance on behalf of Weaver Wind, LLC.


Respectfully submitted,


Christian F. Capizzo, Esq.
Partridge Snow & Hahn, LLP
40 Westminster St., Suite 1100
Providence, RI 02903
Tel: 401-861-8200
Email: cfc@psh.com

Dated: July 16, 2018

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I hereby certify that on July 16, 2018, I sent a copy of the within to all the parties set forth on the attached Service List by electronic mail and copies to Ms. Luly Massaro, Commission Clerk, by electronic mail and regular mail.


Christian F. Capizzo, Esq.

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	kmahoney@keeganwerlin.com ;	
	Laura.Bickel@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
Jon Hagopian, Esq. Division of Public Utilities & Carriers 89 Jefferson Blvd. Warwick, RI 02888	Jon.hagopian@dpuc.ri.gov ;	401-784-4775
	John.bell@dpuc.ri.gov ;	
	Jonathan.Schrag@dpuc.ri.gov ;	
	Al.contente@dpuc.ri.gov ;	
Ellen Cool Levitan & Associates	egc@levitan.com ;	
James Crowley, Esq. Conservation Law Foundation 235 Promenade St., Suite 560 Providence, RI 02908	jcrowley@clf.org ;	401-228-1905
	jelmer@clf.org ;	
NextEra Energy Resources, LLC Joseph A. Keough Jr., Esquire Keough + Sweeney, Ltd. Brian J. Murphy Esq. NextEra Energy Resources, LLC	jkeoughjr@keoughsweeney.com ;	401-724-3600
	Brian.J.Murphy@nexteraenergy.com ;	
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	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Linda.george@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
Andrew Marcaccio, Esq., OER	Andrew.Marcaccio@doa.ri.gov ;	
Christopher Kearns, OER Nicholas Ucci, OER Carol Grant, Commissioner	Christopher.Kearns@energy.ri.gov ;	
	Nicholas.Ucci@energy.ri.gov ;	
	Carol.Grant@energy.ri.gov ;	
Sebastian Hald Buhl, Orsted	sebh@orsted.com ;	857-260-8362
Frederick Zalman, Orsted	FRZAL@orsted.com ;	617-792-4333
Liam Paskvan	lpaskvan@PierceAtwood.com ;	207-791-1306
Michelle Carpenter, Green Development	mc@green-ri.com ;	401-295-4998
Buzz Becker, Hexagon Energy	bbecker@hexagon-energy.com ;	434-326-4623
Seth Handy, Esq.	seth@handylawllc.com ;	401-626-4839
Ram Seetharaman, Solar Micronics	ramsee72@gmail.com ;	
Ganesan Visvabharathy, Solar Micronics	visva@solarmicronics.co ;	
Yolanda Yolanda, Solar Micronics	yolanda@solarmicronics.co ;	
Jamie Dickerson, NECEC	jdickerson@necec.org ;	
Janet Besser, NECEC	jbesser@necec.org ;	

David Peloquin, Eversource

david.peloquin@eversource.com;

860-665-3554