

KEOUGH + SWEENEY, LTD.

ATTORNEYS AND COUNSELORS AT LAW
41 MENDON AVENUE
PAWTUCKET, RHODE ISLAND 02861
TELEPHONE (401) 724-3600
FACSIMILE (401) 724-9909
www.keoughsweeney.com

RAYNHAM OFFICE:
90 NEW STATE HIGHWAY
RAYNHAM, MA 02109
TEL. (508) 822-2813
FAX (508) 822-2832

JOSEPH A. KEOUGH JR.*
JEROME V. SWEENEY III*

SEAN P. KEOUGH*

JEROME V. SWEENEY II
OF COUNSEL

*ADMITTED TO PRACTICE IN
RHODE ISLAND & MASSACHUSETTS

BOSTON OFFICE:
171 MILK STREET
SUITE 30
BOSTON, MA 02109
TEL. (617) 574-0054
FAX (617) 451-1914

February 14, 2019

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

**Re: *Docket 4929 - The Narragansett Electric Company
d/b/a National Grid Review Of Power Purchase Agreement
Pursuant To R.I. Gen. Laws §39-31-1 to 9***

Dear Ms. Massaro:

Enclosed please find an original and nine copies of:

1. DWW Rev I, LLC's Motion To Intervene.

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

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf

cc: Docket 4929 Service List (*via electronic mail*)

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

IN RE: THE NARRAGANSETT ELECTRIC COMPANY :
d/b/a NATIONAL GRID REVIEW OF POWER : DOCKET NO. 4929
PURCHASE AGREEMENT PURSUANT TO :
R.I. GEN. LAWS §39-31-1 TO 9 :

DWW REV I, LLC's MOTION TO INTERVENE

I. INTRODUCTION

Now comes DWW Rev I, LLC ("DWW"), and pursuant to the Rhode Island Public Utilities Commission's Rules of Practice and Procedure (801-RICR-00-00-1, et. seq.) hereby requests that it be allowed to intervene in the above-captioned Docket.

II. INTERVENTION STANDARD

Intervention in proceedings before the Rhode Island Public Utilities Commission ("Commission") is governed by Rule 1.14 of the Commission's Rules of Practice and Procedure (801-RICR-00-00-1.14), 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."

III. FACTS AND GROUNDS IN SUPPORT OF INTERVENTION

On February 7, 2019, the Narragansett Electric Company d/b/a National Grid (“National Grid”) filed a proposed twenty-year Power Purchase Agreement (“PPA”) entered into between National Grid and DWW for review and approval by the Commission under the Rhode Island Affordable Clean Energy Security Act, R.I.G.L. §§ 39-31-1, et. seq. The proposed PPA provides for National Grid’s purchase of energy and renewable energy certificates (“RECs”) from DWW’s 400-megawatt Revolution Wind Farm offshore wind energy facility, which is to be located on the Outer Continental Shelf in the Bureau of Ocean Energy Management lease area off the coast of Rhode Island (the “Facility”).

Under the terms of the PPA, National Grid will purchase 100 percent of the energy and environmental attributes associated with the Facility, on a unit-contingent basis, for a twenty-year term following the commercial operation date of the Facility. The all-in purchase price for energy and RECs is \$0.098425 per kilowatt-hour (“kWh”). The price is inclusive of all transmission costs necessary for DWW to deliver energy and RECs onshore to the Pool Transmission Facilities, as set forth in the PPA. The purchase price allocated to energy, in the event the RECs associated with the Facility fail to satisfy the Renewable Energy Standard as an Environmental Attribute is \$0.071925 per kWh.

As a party to the PPA, DWW has a significant interest in the subject matter of this Docket that will be directly affected by the Commission’s review and decision. These interests are not adequately represented or protected by the existing parties in this Docket, and DWW will be bound by the Commission’s action in this Docket.

Furthermore, as party to the PPA, it is in the public interest that DWW participate in this proceeding to answer questions raised by the Commission.

IV. CONCLUSION

Wherefore, for the reasons set forth herein, DWW Rev I, LLC asserts that it meets the standards for intervention under Rule 1.14 and requests that the Rhode Island Public Utilities Commission grant the relief sought herein.

DWW Rev I, LLC,
By its attorney,



Joseph A. Keough, Jr., Esquire (#4925)
KEOUGH + SWEENEY, LTD.
41 Mendon Avenue
Pawtucket, RI 02861
(401) 724-3600
jkeoughjr@keoughsweeney.com

CERTIFICATION

I hereby certify that on February 14, 2019, 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.

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
	MStern@keeganwerlin.com ;	
	Jdunne@keeganwerlin.com ;	
	Corinne.didomenico@nationalgrid.com ;	
	Timothy.brennan@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 ;	
	Ronald.Gerwatowski@dpuc.ri.gov ;	
	Thomas.kogut@dpuc.ri.gov ;	
	Jonathan.Schrag@dpuc.ri.gov ;	
Office of Energy Resources Andrew Marcaccio, Esq. Carol Grant, Commissioner Christopher Kearns, OER Nicholas Ucci, OER	Andrew.Marcaccio@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	Nicholas.Ucci@energy.ri.gov ;	
	Carol.Grant@energy.ri.gov ;	
John Dalton Carson Roberts Power Advisory LLC	crobers@poweradvisoryllc.com ;	
	jdalton@poweradvisoryllc.com ;	
File an original & 9 copies w/: Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2017
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Margaret.Hogan@puc.ri.gov ;	
Orsted US Offshore Wind: Stacy Tingley David Schwartz Jeffrey Grybowski	STATI@orsted.com ;	
	DSCHW@orsted.com ;	
	JEFGR@orsted.com ;	

Coit, Janet, DEM Director Christina Hoefsmit, Esq.	Janet.Coit@dem.ri.gov;	
	Christina.Hoefsmit@dem.ri.gov;	
	Mary.Kay@dem.ri.gov;	
	Ron.Gagnon@dem.ri.gov;	
	Julia.Livermore@dem.ri.gov;	
Ted Nesi	TNesi@wpri.com;	



Joseph A. Keough, Jr., Esquire # 4925
 KEOUGH & SWEENEY, LTD.
 41 Mendon Avenue
 Pawtucket, RI 02861
 (401) 724-3600 (phone)
 (401) 724-9909 (fax)
jkeoughjr@keoughsweeney.com