

**STATE OF RHODE ISLAND**  
**DIVISION OF PUBLIC UTILITIES AND CARRIERS**

IN RE: INTERSTATE NAVIGATION CO.:      DOCKET NO.: D-06-53

**IHSF'S MOTION TO INTERVENE**

Now comes Island Hi-Speed Ferry, LLC (IHSF), pursuant to Division Rule of Practice and Procedure 17, and moves that it be granted leave to intervene in this docket.

The grounds for this request are that:

1.      IHSF has a direct financial interest in the transaction and petitions for which Interstate seeks Division approval;
2.      IHSF's interests are similar to Interstate's interests in the petitions under consideration, but they are not identical and IHSF is not adequately represented by existing parties; and,
3.      IHSF's participation will be in the public interest because of its unquestionable institutional knowledge of the market and regulatory dynamics giving rise to the transaction for which approval is sought.

IHSF's position regarding the various approvals sought is as follows:

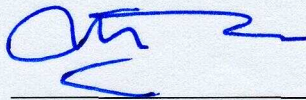
- a.      IHSF supports Interstate's petition for approval of the sale of IHSF's Rhode Island assets and the lease-back of the MV *Athena* from Interstate to IHSF;
- b.      IHSF supports the elimination of all restrictions on Interstate's Fast Ferry CPCN;



- c. IHSF supports the elimination of all restrictions on IHSF's Fast Ferry CPCN;
- d. IHSF supports the transfer of IHSF's Fast Ferry CPCN to Interstate and approval of Interstate's request to continue holding IHSF's CPCN in dormancy;
- e. IHSF supports Interstate's request to continue holding the Newport leg of its Fast Ferry CPCN in dormancy.

This motion has been served electronically upon all potential parties in interest.

ISLAND HI-SPEED FERRY, LLC  
By its Attorneys,  
HAGOPIAN & HAGOPIAN



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**CERTIFICATION**

I hereby certify that I mailed a true copy of the within "Motion to Intervene" by regular mail, postage pre-paid on the 6 day of September, 2006, **AND SERVED IT ELECTRONICALLY**, to and upon the following:

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