

MINTZ LEVIN

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June 9, 2010

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, Second Floor
Boston, MA 02110

Re: Petition of Massachusetts Electric Company and Nantucket Electric Company
each d/b/a National Grid for Approval by the Department of Public Utilities of
Two Long-Term Contracts to Purchase Wind Power and Renewable Energy
Certificates, D.P.U. 10-54

Dear Secretary Marini:

Enclosed please find the original and 10 copies of the New England Power Generators
Association Motion to Intervene, Notice of Appearance of Counsel, and Certificate of Service in
the above-referenced proceeding.

Thank you for your attention to this matter.

Very truly yours,



Richard A. Kanoff

Enclosures

cc: Laura Bickel, Hearing Officer
Service List, D.P.U. 10-54

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

BOSTON | WASHINGTON | NEW YORK | STAMFORD | LOS ANGELES | PALO ALTO | SAN DIEGO | LONDON

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF PUBLIC UTILITIES

Petition of Massachusetts Electric Company)
and Nantucket Electric Company each d/b/a)
National Grid for Approval of the Department of)
Public Utilities of Two Long-Term Contracts to) D.P.U. 10-54
Purchase Wind Power and Renewable Energy)
Certificates, Pursuant to G.L. c. 169, § 83 and)
220 CMR § 17.00 et. seq.)

**PETITION TO INTERVENE OF NEW ENGLAND POWER GENERATORS
ASSOCIATION AS A PARTY**

Introduction

Pursuant to 220 C.M.R. § 1.03, the New England Power Generators Association (“NEPGA”) hereby petitions to intervene as a party in the above-captioned docket.¹ As grounds therefor, NEPGA states as follows:

1. NEPGA is a private, non-profit entity that advocates for the business interests of non-utility electric power generators in New England. NEPGA has offices located at 141 Tremont Street, Boston, MA 02111.

2. NEPGA’s member companies represent approximately 27,000 megawatts of electrical generating capacity throughout the New England region, with approximately 12,000 megawatts in Massachusetts. NEPGA’s mission is to promote sound energy policies which will further economic development, jobs, and balanced environmental policy.

NEPGA’s member companies are responsible for generating and supplying electric power for sale within the New England bulk power system. In addition, NEPGA’s members

¹ The comments contained in this filing represent the position of NEPGA as an organization, but not necessarily the position of any particular member(s) with respect to any statement, concept, issue or position expressed herein.

participate or may seek to participate in long-term contract solicitations in Massachusetts, pursuant to G.L. c. 169, § 83 (“Green Communities Act”).

3. On May 10, 2010, the Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid (“National Grid” or the “Company”) filed a petition with the Department of Public Utilities (“Department”) seeking approval of two long-term contracts to purchase wind power (“PPAs”) from an off-shore wind generating facility (“Facility”) and renewable energy certificates (“RECs”) from Cape Wind Associates, LLC (“Cape Wind”), pursuant to Section 83 of the Green Communities Act.

4. On May 24, 2010, the Department issued a Notice of Filing and Public Hearing (“Notice of Filing”), and set forth a schedule for filing of direct testimony, interventions, and public hearings. This Petition to Intervene is submitted pursuant to the Notice of Filing.

5. On June 4, 2010, pursuant to the Notice of Filing, National Grid filed direct testimony in support of its request for regulatory approval of the PPAs under Section 83 of the Green Communities Act. In its submittal, National Grid notes, *inter alia*, that the Facility will impact wholesale market supply generally and specifically effect reliability, fuel diversity and system peak load.

Intervention Request

6. NEPGA members provide electric power for sale within the wholesale markets and actively support a competitive, functional, transparent wholesale market and procurement process. As active participants in the ISO New England Inc. (“ISO-NE”) day-ahead and real-time markets, and as interested parties in Section 83 solicitations, NEPGA’s member companies have substantial and direct interests in the outcome of this

proceeding. Specifically, NEPGA and its members have a substantial and specific interest in ensuring that any determination in this proceeding is reasonable, does not adversely impact the competitiveness of a robust wholesale energy market and encourages a fair and open solicitation process, as required by Section 83. NEPGA requests full party status in this proceeding.

7. NEPGA's participation as a party in this docket conserves resources for the Department and other participants that might otherwise have to respond to participation by multiple individual NEPGA's member companies seeking to protect their own interests. It will protect in an efficient manner the interests of NEPGA's members that do not otherwise seek party or limited participant status.

8. NEPGA requests the right to participate in all aspects of this case, including, as it deems necessary, the presentation of testimony, cross-examination of witnesses, and presentation of arguments.

Conclusion

Accordingly, for the above-described reasons, the Department should grant the Petition of NEPGA to intervene as a full party in this proceeding.

Respectfully submitted,

NEW ENGLAND POWER GENERATORS
ASSOCIATION



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Angela O'Connor
President
NEW ENGLAND POWER GENERATORS
ASSOCIATION
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Date: June 9, 2010

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NOTICE OF APPEARANCE OF COUNSEL

On behalf of the New England Power Generators Association, please enter the appearance of Richard A. Kanoff in the above captioned matter.

Respectfully submitted,

NEW ENGLAND POWER GENERATORS
ASSOCIATION



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DEPARTMENT OF PUBLIC UTILITIES

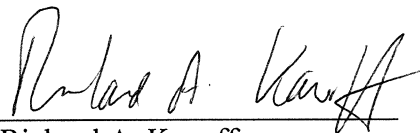
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CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing document upon the Department of Public Utilities and the Service List in the above docketed proceeding in accordance with the requirements of 220 CMR 1.05(1).

Respectfully submitted,

NEW ENGLAND POWER GENERATORS
ASSOCIATION



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