STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

ELECTRIC RENEWABLE PORTFOLIO STANDARD

RSA 362-F:4, VI ADJUSTMENTS TO CLASS III RENEWABLE PORTFOLIO

REQUIREMENTS

DOCKET NO. DE 13-021

PETITION TO INTERVENE

RHODE ISLAND ENGINE GENCO, LLC (fka RIDGEWOOD RHODE ISLAND GENERATION, LLC)

Rhode Island Engine Genco, LLC ("RIEG") hereby petitions to intervene in the above-captioned docket pursuant to RSA 541-A:32 and PUC 203.17.

- 1. RIEG provides wholesale electric distribution service in New Hampshire. RIEG is subject to the requirements of RSA 362-F:3 as they relate to the acquisition and retirement of renewable energy certificates ("RECs"), including those denoted as Class III RECs, which encompass certain existing landfill gas-to-energy facilities.
- 2. The instant docket concerns issues relating to potential adjustments to the requirements relating to Class III RECs.
- 3. Any changes to RIEG's REC obligations may impact RIEG and its parent company. RIEG seeks to intervene in this docket because of its current certifications by New Hampshire Renewable Portfolio Standard law for the Johnston I and II landfill methane gas facilities (NH-III-09-041 and NH-III-09-042, respectively).
- 4. RIEG has inadvertently filed this petition beyond the date set in the Commission's Order of Notice. However, because this docket is at a preliminary stage, the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.

WHEREFORE, RIEG respectfully requests that the Commission grant the following relief:

- A. Grant this petition to intervene; and
- B. Grant such other and further relief as the Commission deems necessary and in the public interest.

Respectfully submitted,

Rhode Island Engine Genco, LLC

By: Stephen D. Galowitz

Title: Chief Development Officer