

# ROBINSON & COLE LLP

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Also admitted in Rhode Island

*Via First Class Mail*

August 18, 2005

Luly Massaro  
Clerk  
Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

**Re: Docket No. 3689 - Narragansett Electric Co. Standard Offer Rate Filing**

Dear Ms. Massaro:

Enclosed for filing please find an original and nine (9) copies of Direct Energy Services, LLC's petition to intervene in the above-referenced proceeding.

Please call with any questions related to this submission.

Very truly yours,



Mary L. Cataudella

Enclosure

cc: Service List



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STATE OF RHODE ISLAND  
AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION

NARRAGANSETT ELECTRIC CO. :  
STANDARD OFFER RATE FILING :

DOCKET NO. 3689

PETITION OF DIRECT ENERGY SERVICES, LLC TO INTERVENE

Direct Energy Services, LLC (“Direct Energy”) hereby petitions the State of Rhode Island and Providence Plantations Public Utilities Commission (“PUC”) to be designated as an intervenor in the above-captioned proceeding. In support of this petition, Direct Energy states as follows:

1. Direct Energy is a registered nonregulated power producer in good standing;
2. As a retail seller of electricity in Rhode Island, Direct Energy has an interest in the outcome of this proceeding because it has the potential to impact the competitive landscape in Rhode Island and, as result, Direct Energy’s competitive services;
3. Direct Energy’s participation is in the interests of justice as its legal rights, duties or privileges may be specifically affected by this proceeding;
4. In no way will Direct Energy’s participation impair the orderly conduct of this proceeding.
5. Direct Energy proposes to fully participate in the proceeding, including but not limited to taking some or all of the following actions: the filing of comments, participation in any hearings convened by the PUC including cross-examination of witnesses, submitting pre-filed testimony or other evidence, submitting a brief and written exceptions and participating in oral arguments, if any.

6. Correspondence and other communication in regard to this matter should be served upon the following parties:

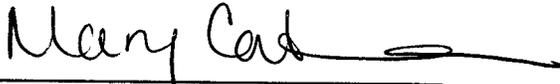
Patrick Jeffery, VP – Government Affairs NE  
263 Tresser Boulevard, 8<sup>th</sup> Floor  
Stamford, CT 06901  
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WHEREFORE, for the foregoing reasons, Direct Energy requests that it be designated an intervenor in this proceeding.

Dated: August 18, 2005

Respectfully submitted,  
DIRECT ENERGY SERVICES, LLC

By: 

Mary L. Cataudella, Esq., # 5421  
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One Boston Place  
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**CERTIFICATE OF SERVICE**

I hereby certify that, a copy of the foregoing *Petition of Direct Energy Services, LLC to Intervene* was mailed via first-class mail, postage pre-paid, to all counsel and parties of record, on this 18<sup>th</sup> day of August 2005.

Laura S. Olton  
General Counsel  
Narragansett Electric  
280 Melrose St.  
Providence, RI 02907

John Farley  
Executive Director  
The Energy Council of Rhode Island  
One Richmond Square, Suite 340D  
Providence, RI 02906

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Mary L. Cataudella