



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

150 South Main Street • Providence, RI 02903

(401) 274-4400

TDD (401) 453-0410

Patrick C. Lynch, Attorney General

September 30, 2005

Via First Class Mail And Electronically

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

**Re: Successor Alternative Regulation Plan For
Verizon New England Inc., d/b/a Verizon
Rhode Island – PUC Docket 3692**

Dear Ms. Massaro:

Enclosed for filing please find an original and nine (9) copies of the Motion to Intervene of Patrick C. Lynch, Attorney General, for filing in the above-referenced proceeding.

Thank you for your attention to this matter.

Sincerely,

William K. Lueker (R.I. Bar # 6334)
Special Assistant Attorney General
Tel. (401) 274-4400 ext. 2299
Fax (401) 222-3016

Encl.

Copy to: Service List for Docket 3692

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION

IN RE: SUCCESSOR ALTERNATIVE REGULATION)
PLAN FOR VERIZON NEW ENGLAND INC.,) DOCKET NO. 3692
D/B/A VERIZON RHODE ISLAND)

MOTION TO INTERVENE OF
PATRICK C. LYNCH, ATTORNEY GENERAL

Pursuant to Rule 1.13 of the *Rules of Practice and Procedure* (the “Rules”) of the Public Utilities Commission (the “Commission”), Patrick C. Lynch, Attorney General of the State of Rhode Island, hereby moves to intervene with full-party status in the above-captioned proceeding.

Under common law, the Attorney General is the representative of the public, empowered to bring actions to redress grievances suffered by the public as a whole. The Attorney General has been granted full-party status in similar and/or related proceedings of the Commission and of the Division of Public Utilities and Carriers (the “Division”) in the past. The instant proceeding may result in additional utility rate increases at a time when many rate-payers are already particularly hard-pressed to pay their telephone and other utility bills.

The Attorney General’s common law duty to represent and protect the interests of the public as a whole, particularly in this time of great economic uncertainty, require the Attorney General to seek intervention in this matter. The Attorney General submits that his participation in this matter will assist the Commission in its determination as to whether or not Verizon New England Inc.’s (“Verizon”) should be approved at this time in whole or in part as consistent with public interest, policy and law.

At this point in time, the Attorney General has not formulated a position with regard to this filing. After he has further evaluated this filing in its entirety, he will be able to take a more substantive position.

WHEREFORE, for the reasons set forth herein, the Attorney General requests that the Commission grant his motion to intervene in this proceeding.

PATRICK C. LYNCH
ATTORNEY GENERAL
By his attorney,



William K. Lueker (R.I. Bar # 6334)
Special Assistant Attorney General
150 South Main Street
Providence, RI 02903
Tel. (401) 274-4400 ext. 2299
Fax (401) 222-3016

September 30, 2005

CERTIFICATE OF SERVICE

I certify that a copy of the within motion was served electronically as well as by regular mail, postage prepaid, to all persons listed this date on the service list for PUC Docket No. 3692 on the 30th day of Sept., 2005.

