



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

November 28, 2005

Via First Class Mail And Electronically

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

**Re: National Grid Company Request For
Approval Of Dispensation Of Settlement
Proceeds – PUC Docket No. 3710**

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

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID COMPANY REQUEST)
FOR APPROVAL OF DISPENSATION OF)
SETTLEMENT PROCEEDS) **DOCKET NO. 3710**

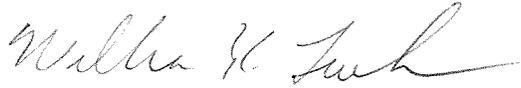
MOTION TO INTERVENE OF
PATRICK C. LYNCH, ATTORNEY GENERAL

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. At a pre-hearing conference held November 17, 2005, at the Rhode Island Public Utilities Commission, the parties to this proceeding indicated that they had no objection to the intervention of the Attorney General.

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 Attorney General’s common law duty to represent and protect the interests of the public as a whole 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 Narragansett Electric’s requests should be approved at this time in whole or in part as consistent with public interest, policy and law.

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

November 28, 2005

CERTIFICATE OF SERVICE

I certify that a copy of the within motion was served by regular mail, postage prepaid, as well as electronically, to all persons listed this date on the service list for PUC Docket No. 3710 on the 28th day of November, 2005.

