

Eric J. Krathwohl, Esq.
Direct Dial: (617) 556-3857
E-mail: ekrathwohl@richmaylaw.com

April 3, 2006

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

Re: Narragansett Electric Co. d/b/a National Grid Docket 3732

Dear Ms. Massaro:

Enclosed for filing in the above-captioned matter please find ISO New England's ("ISO") Motion to Intervene. Please include me on the service list.

Please note that we are currently making efforts to obtain admission to practice before the Commission in this matter *Pro Hac Vice*. In order to meet the deadline for intervention we are making this filing now and will address any other procedural matters as a follow up.

Please call me if there are any questions.

Sincerely,



Eric J. Krathwohl

Enclosure

cc: Cynthia Wilson-Frias, Esq., Sr. Legal Counsel
Matthew F. Goldberg, Esq. (via email)
Service List (Dkt. 2732)

**STATE OF RHODE ISLAND AND
PROVIDENCE PLANTATIONS**

PUBLIC UTILITIES COMMISSION

DOCKET No. 3732

**In re: The Application of Narragansett Electric
Company d/b/a National Grid, Southern Rhode
Island Transmission Project**

**MOTION TO INTERVENE OF
ISO NEW ENGLAND INC.**

Pursuant to Section 1.13 of the Commission's Rules of Practice and Procedure, ISO New England Inc. ("ISO") hereby requests the Public Utilities Commission ("PUC") for leave to intervene as a party in the above proceedings, stating in support thereof the following:

1. The ISO is the private, independent, non-profit Regional Transmission Organization for New England, located at One Sullivan Road, Holyoke, Massachusetts. Pursuant to the agreements and tariffs on file with the Federal Energy Regulatory Commission, the ISO administers the regional open access transmission tariff for New England, administers the New England product markets, and operates the New England bulk power system (the "System"). The ISO also has the responsibility to protect the short-term reliability of the control area and to administer competitive and efficient wholesale markets.

2. The PUC opened this docket to, among other things, provide an advisory opinion to the Rhode Island Energy Facilities Siting Board (pursuant to the March 3, 2006 Notice of Designation to an Agency to Render an Advisory Opinion) regarding the proposal of Narragansett Electric Company ("Narragansett" or the "Company") to construct a new 115 kilovolt (kV) transmission line and 115 kV tap lines, reconductor existing 115 kV transmission lines, construct a new 115-12.47 kV substation and expand and modify an existing substation

(collectively the "Project") in several towns, including Warwick, North Kingston, South Kingston and East Greenwich.

3. Pursuant to the Procedural Schedule, dated March 20, 2006, ISO requests that it be permitted to intervene as a party at this time in order to adequately represent and protect its interests in this proceeding. ISO is substantially and specifically affected by this proceeding, because it is responsible for the provision of transmission service and for regional system planning through the open access transmission tariff for New England, which includes the State of Rhode Island. The Application under review concerns construction of new transmission capacity and upgrading of existing transmission facilities, as referenced in paragraph 2 above, and in its Application, Narragansett asserts that the Project will improve the reliability and stability of the electrical transmission system in Rhode Island. Because such transmission system enhancements are central to the function of ISO and because no other party shares such responsibility, ISO is specifically affected and no other party can adequately represent ISO's interests in this regard.

4. This proceeding affects ISO's interests as described above, and ISO's interest in this matter cannot be adequately addressed or represented by any other party. Further, ISO's participation in this proceeding as a party may help ensure the development of a comprehensive record, while affording ISO the opportunity to maximize its ability to fulfill its obligations as noted above.

5. If granted leave to intervene, ISO's intention currently is to participate in this proceeding primarily by filing briefs and comments, and not by presentation of testimony or other relevant evidence, or issuing or responding to discovery. If granted leave to intervene, ISO

requests that copies of all materials filed in this docket be served on ISO as specified in paragraph 6 below.

6. All communications and correspondence for this proceeding should be directed to the undersigned and to:

Eric Krathwohl, Esq.,
Rich May, PC
176 Federal Street, 6th Floor
Boston, MA 02110-2223
(617) 556-3857 (Telephone)
(617) 556-3890 (Fax)
e-mail: ekrathwohl@richmaylaw.com

WHEREFORE, ISO New England Inc. requests that it be permitted to intervene in these proceedings as a party.

Respectfully submitted,

ISO New England Inc.

By:



Eric Krathwohl, Esq.,
Rich May, PC
176 Federal Street, 6th Floor
Boston, MA 02110-2223
(617) 556-3857 (Telephone)
(617) 556-3890 (Fax)
E-mail: ekrathwohl@richmaylaw.com

Date: April 3, 2006

**STATE OF RHODE ISLAND AND
PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

Narragansett Electric Co. d/b/a)
National Grid)
_____)

Docket 3732

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing upon the Commission and the persons on the Service List in the above-docketed proceeding in accordance with the requirements of Commission's Rules of Practice and Procedure.



Eric J. Krathwohl, Esq.
Rich May, a Professional Corporation
176 Federal Street
Boston, MA 02110
(617) 556-3857

Dated: April 3, 2006