

# *Schacht & McElroy*

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November 30, 2007

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

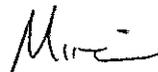
In Re: National Grid  
Docket No. 3902

Dear Luly:

Enclosed are an original and nine copies of The Energy Council of Rhode Island's Petition to Intervene and Motion to Extend the time for the filing of its Position Paper/Testimony by one week to December 7, 2007.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg

cc: Laura Olton, Esq.  
Paul Roberti, Esq.  
Steven Scialabba

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID : Docket No. 3902  
JANUARY 2008 ELECTRIC RETAIL RATE FILING :

**PETITION OF THE ENERGY COUNCIL OF RHODE ISLAND (TEC-RI) TO  
INTERVENE AS A FULL PARTY  
AND MOTION TO EXTEND THE TIME FOR FILING THE POSITION  
PAPER/TESTIMONY OF TEC-RI BY ONE WEEK UNTIL DECEMBER 7, 2007**

The Energy Council of Rhode Island (TEC-RI), in its own name and on behalf of its members, hereby petitions to intervene as a full party in the above-entitled docket and also moves to extend the time for filing its position paper/testimony by one week until December 7, 2007, and states as follows:

1. TEC-RI is an unincorporated, non-profit organization of large users of electricity within the service territory of National Grid.
2. Large users have unique needs and concerns.
3. TEC-RI and its members will be specifically affected by the above docket.
4. TEC-RI seeks full party intervenor status in order to fully participate in the hearings and discussions regarding all matters pertaining to this docket.
5. The filing in the matter was only made two (2) weeks ago. TEC-RI needed to convene its members to decide on intervention, and needed to hire legal counsel. TEC-RI also needs to do research to prepare its position. Accordingly, TEC-RI is not yet in a position to file its position paper/testimony today, as required by the procedural schedule adopted on November 21, 2007.
6. TEC-RI will be able to file its position paper/testimony in one (1) week, and therefore moves for an extension of time until December 7, 2007 for its filing.

7. TEC-RI will be prepared to go forward with the hearing on December 14, 2007.
8. The Division and National Grid do not oppose this motion.
9. TEC-RI also believes that The George Wiley Center has also moved to intervene and has been granted an extension for the filing of its position paper/testimony until December 7, 2007.
10. All correspondence to TEC-RI should be addressed as follows:

Mr. John Farley  
Executive Director  
The Energy Council of Rhode Island  
One Richmond Square, Suite 340D  
Providence, RI 02906  
401-621-2240  
FAX: 401-621-2260  
E-MAIL: [jfarley316@hotmail.com](mailto:jfarley316@hotmail.com)

**with a copy to:**

Michael R. McElroy, Esq.  
Schacht & McElroy  
21 Dryden Lane  
P.O. Box 6721  
Providence, RI 02940-6721  
[McElroyMik@aol.com](mailto:McElroyMik@aol.com)

WHEREFORE, The Energy Council of Rhode Island respectfully requests that this  
Petition to Intervene and Motion to Extend be granted.

Respectfully submitted,  
The Energy Council of Rhode Island  
By its attorney

Date: November 30, 2007



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CERTIFICATE OF SERVICE

I hereby certify that on the 30<sup>th</sup> day of November, 2007, I mailed a true copy of the foregoing by first class mail to:

Laura Olton, Esq.  
National Grid  
280 Melrose Street  
Providence, R.I. 02907

Paul Roberti, Esq.  
Attorney General's Office  
150 South Main Street  
Providence, R.I. 02903

Steven Scialabba  
Division of Public Utilities & Carriers  
89 Jefferson Boulevard  
Warwick, R.I. 02888

  
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Michael R. McElroy