

P R E N T I S S  
L • A • W • F • I • R • M

April 1, 2008

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

RE: EERMC – Docket 3931 – Efficiency and System Reliability Procurement Standards –  
Motion to Intervene

Dear Ms. Massaro:

Enclosed are one original and nine copies of the Energy Efficiency and Resources Management Council's ("EERMC") Motion to Intervene in Docket 3931.

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

Sincerely,



R. Daniel Prentiss

Cc: Service List

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION

IN RE: RI ENERGY EFFICIENCY AND RESOURCE	:	DOCKET NO. 3931
MANAGEMENT COUNCIL'S PROPOSED STANDARDS	:	
FOR ENERGY EFFICIENCY AND CONSERVATION	:	
PROCUREMENT AND SYSTEM RELIABILITY	:	

**MOTION TO INTERVENE OF THE RHODE ISLAND  
ENERGY EFFICIENCY AND RESOURCES MANAGEMENT COUNCIL**

The Rhode Island Energy Efficiency and Resources Management Council ("EERMC" or "Council"), by its attorney, hereby moves under Rule 1.13 of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission ("Rules" and "Commission," respectively) to intervene in the above-captioned proceeding and, in support of its motion, states as follows:

1. The EERMC has a right conferred by statute to intervene in this proceeding. Section 39-1-27.9 of the Rhode Island General Laws states that "in any Commission inquiry into or examination of matters that relate to or could potentially impact any programs, functions or duties of...the energy efficiency and resources management council, including but not limited to, those programs, functions and duties pursuant to this chapter and chapters 42-140, 42-140.1, 42-140.2, and 42-141" that the Council upon the formal request "shall be deemed" to be "an interested party for all purposes."
2. The aforementioned Chapters, including 39-1 and 42-140.1, address least cost procurement and proposed standards for energy efficiency and conservation procurement and system reliability. As such, the Council has a right conferred by statute to intervene in this matter.
3. Rule 1.13 (b)(1) establishes that those with a right conferred by statute may intervene in such dockets. In this regard the EERMC's intervention is necessary and appropriate under Rule 1.13(b)(1) of the Rules as established in the paragraphs above.

Service of any correspondence or pleadings in connection with these matters should be directed to:

Samuel P. Krasnow (EERMC Voting Member)  
203 S. Main Street  
Providence, RI 02903  
[skrasnow@env-ne.org](mailto:skrasnow@env-ne.org)

and

S. Paul Ryan (EERMC Voting Member)  
670 Willett Ave  
Riverside, RI 02915-2640  
[spryan@eplaw.necoxmail.com](mailto:spryan@eplaw.necoxmail.com)

and


R. Daniel Prentiss  
One Turks Head Place, Suite 380  
Providence, RI 02903  
[dan@prentisslaw.com](mailto:dan@prentisslaw.com)

WHEREFORE, the EERMC asks that its motion to intervene be granted.

Respectfully submitted,

THE RHODE ISLAND ENERGY EFFICIENCY  
AND RESOURCES MANAGEMENT COUNCIL

By its attorney,



R. Daniel Prentiss  
One Turks Head Place, Suite 380  
Providence, RI 02903  
[dan@prentisslaw.com](mailto:dan@prentisslaw.com)

#### CERTIFICATE OF SERVICE

I hereby certify that on the 1<sup>st</sup> day of April, 2008, I filed one original and 9 copies of this document to the Commission not later than 4:00 P.M. as required by the Notice of Pre-Hearing Scheduling Conference for Docket 3931 issued on March 17, 2008.



R. Daniel Prentiss