

FERRUCCI RUSSO P.C.

COUNSELLORS AT LAW

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April 1, 2008

Via e-mail &
via first-class mail

Luly E. Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02889

**RE: In re: RI Energy Efficiency and Resource Management Council
Docket No. 3931**

Dear Ms. Massaro:

Enclosed please find the original and nine (9) copies of Environmental Northeast's Motion to Intervene with regard to the above-referenced matter.

We have placed Jeremy McDiarmid and Roger Koontz on the service list, as we will be filing a motion for *pro hac vice* within the next couple of days.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Sincerely,



W. MARK RUSSO

WMR/was
Enclosure

cc: Service List (w/encl.) (via e-mail)
Samuel P. Krasnow, Esq. (w/encl.) (via e-mail)
Jeremy McDiarmid, Esq. (w/encl.) (via e-mail)
Roger E. Koontz, Esq. (w/encl.) (via e-mail)

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

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

MOTION TO INTERVENE OF ENVIRONMENT NORTHEAST

By its attorney, Environment Northeast ("ENE"), hereby moves pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules") to intervene in the above-captioned proceeding and, in support of its motion, states:

1. ENE is a non-profit organization which researches and addresses environmental problems that threaten regional ecosystems, human health and the management of natural resources. ENE is a participant in the Rhode Island demand-side management collaborative for electric and natural gas efficiency programs, has a staff member who has been appointed to the RI Energy Efficiency and Resources Management Council, is a member of the Energy Conservation Management Board which reviews the planning and implementation of gas and electric utility energy efficiency programs for the State of Connecticut, and has been appointed to Maine's newly created Energy Conservation Board. ENE has been active in Rhode Island and other New England states in researching and promoting energy efficiency and other demand side measures to mitigate environmental harm and reduce costs for energy consumers.
2. Rule 1.13(b) of the Commission Rules of Practice and Procedure states "any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission."
3. Further, Rule 1.13(b)(2) goes on to state that such a right or interest may be "an interest which may be directly affected and which is not adequately represented by existing parties."
4. ENE's interests are directly affected by the issues in this proceeding and cannot be adequately represented by any other party. ENE spends considerable time, effort, and monetary resources working to ensure that least cost energy efficiency resources are procured in Rhode Island, Massachusetts, Connecticut, and Maine to mitigate environmental harm, including but not limited to those harms associated with climate change and local air pollution, and reduce costs for energy consumers. ENE has unique expertise in this matter

that is not able to be adequately represented by other parties and ENE's interests are directly affected by this proceeding.

5. Rule 1.13(b)(3) states that such a right or interest to intervene may be "any other interest of such nature that movant's participation may be in the public interest. ENE's staff has a combined several decades of experience on energy efficiency and system reliability resource procurement and has the capacity and organizational commitment to ensure such procurements in Rhode Island maximize environmental, climate, public health, and consumer benefits. As such, ENE's participation in this proceeding is in the public interest.
6. Accordingly, ENE's intervention is necessary and appropriate under Rule 1.13(b)(2) and Rule 1.13(b)(3) of the Rules.

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

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WHEREFORE, ENE asks that its motion to intervene be granted.

Respectfully submitted,

Environment Northeast
By its Attorneys,

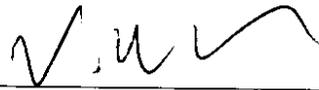


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Dated: April 1, 2008

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2008, I filed with the RI Public Utilities Commission one original and 9 copies of this document as stipulated in the Docket 3931 Notice of Pre-Hearing Scheduling Conference letter.



W. Mark Russo (#3937)

**Standards for Least Procurement Plan and System Reliability
 Procurement Plan - No. 3931
 Service list updated on 03/17/08**

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