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April 1, 2008

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

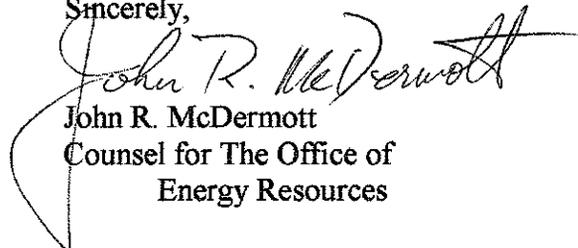
Re: Docket No. 3931 – RI Energy Efficiency and Resource Management
Council's Proposed Standards For Energy Efficiency and Conservation
Procurement And System Reliability

Dear Ms. Massaro:

Enclosed for filing please find the original and nine copies of the Motion To Intervene of the Rhode Island Office of Energy Resources for filing in the above-referenced proceeding.

Thank you for your assistance in this matter.

Sincerely,


John R. McDermott
Counsel for The Office of
Energy Resources

cc: Docket No. 3931 Service List

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

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

MOTION TO INTERVENE OF THE RHODE ISLAND OFFICE OF ENERGY RESOURCES

The Rhode Island Office of Energy Resources ("OER") hereby moves under Rule 1.13 (b)(1) 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:

I. COMMUNICATIONS

All communications, correspondence or pleadings related to this proceeding should be directed to:

Andrew C. Dzykewicz
RI Office of Energy Resources
One Capitol Hill
Providence, RI 02908-5850
adzykewicz@energy.ri.us ; and

John R. McDermott, Esq.
27 East Street, Unit 2
Providence, RI 02906
JRMcDermott.law@gmail.com

II. POSITION AND GROUNDS FOR INTERVENTION

OER is a state agency, created by The Comprehensive Energy Conservation, Efficiency and Affordability Act of 2006 ("Act") and, in particular, Section 11 of the Act which contains the Rhode Island Energy Resources Act. The Rhode Island Energy Resources Act, as codified in Title 42, chapter 140 of the Rhode Island General Laws, gives OER broad responsibilities and powers to develop and promote the "provision of energy resources for Rhode Island in a manner that enhances economic well-being, social equality, and environmental quality" as well as other diverse and substantial energy-related missions and powers.

The Act also added section 39-1-27.7 to the Rhode Island General Laws specifically tasking the OER with participating in and assisting with the development of the standards which will result from this proceeding.

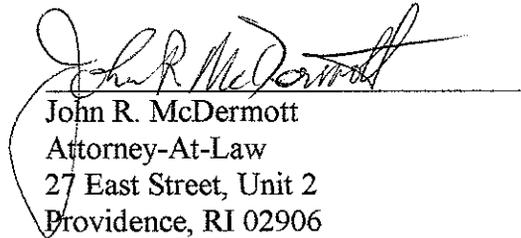
The Act further added section 39-1-27.9 which provides that, in any proceedings such as this "...that relate to or could potentially impact any programs, functions or duties of the office of energy resources...", OER, upon formal request to this Commission, shall be deemed to be "...an interested party for all purposes,..." in any such proceedings. This proceeding relates to and could potentially impact programs, functions and duties of the OER.

Therefore, OER is entitled to participate in this proceeding as a matter of right and such participation is consistent with OER's statutory responsibilities and will further the public interest. Accordingly, OER's intervention is necessary and appropriate under Rule 1.13 (b) (1) of the Commission's Rules.

III. CONCLUSION

WHEREFORE, for the above-stated reasons, OER asks that the Commission grant its request for intervention in the above-referenced docket, with all rights associated therewith.

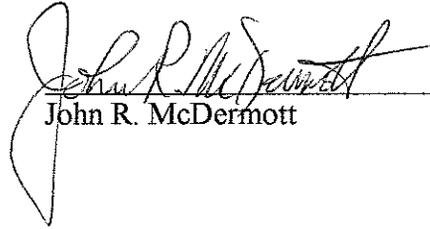
Respectfully submitted,
Rhode Island Office of Energy Resources
By Its Attorney,



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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of April, 2008, I emailed a copy of this document to all persons providing email addresses and sent a paper copy by regular mail to any remaining persons, all as designated in the official service list compiled by the Commission Clerk in this proceeding.



John R. McDermott