



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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*Patrick C. Lynch, Attorney General*

May 27, 2008

**By First Class Mail And Electronically**

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

**Re: National Grid Application for Rate Change  
Pursuant to R.I.G.L. §§ 39-3-10 and 39-3-11  
Docket No. 3943**

Dear Ms. Massaro:

Enclosed for filing please find an original and nine (9) copies of the Motion to Intervene of Patrick C. Lynch, Attorney General, for filing in the above-referenced proceeding.

Thank you for your attention to this matter.

Sincerely,

Leo J. Wold  
Special Assistant Attorney General

Enclosure

RECEIVED  
2008 MAY 28 AM 11:49  
OFFICE OF THE ATTORNEY GENERAL

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID RHODE ISLAND – GAS )  
REQUEST FOR CHANGE OF GAS ) DOCKET NO. 3943  
DISTRIBUTION RATES PURSUANT TO R.I.G.L. )  
§§ 39-3-10 AND 39-3-11 )

RECEIVED  
2008 MAY 28 AM 11:43  
PUBLIC UTILITIES COMMISSION

**MOTION TO INTERVENE OF PATRICK C. LYNCH,**  
**ATTORNEY GENERAL**

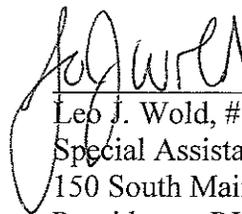
Pursuant to Rule 1.13 of the *Rules of Practice and Procedure* (the “Rules”) of the Public Utilities Commission (the “Commission”), Patrick C. Lynch, Attorney General of the State of Rhode Island, hereby moves to intervene with full-party status in the above-captioned proceeding.

Under common law, the Attorney General is the representative of the public, empowered to bring actions to redress grievances suffered by the public as a whole. The Attorney General has been granted full-party status in similar and/or related proceedings of the Commission in the past. The instant proceeding may lead to yet another utility rate increase at a time when many ratepayers are already particularly hard-pressed to pay their natural gas and other utility bills. The Attorney General was allowed to intervene in earlier proceedings and believes it would be appropriate to engage in similar representation in these proceedings. These circumstances, and the Attorney General’s common law duty to represent and protect the interests of the public as a whole in this time of great economic uncertainty, require the Attorney General to seek intervention in this matter. The Attorney General submits that his participation in this matter will assist the Commission in its determination as

to whether or not National Grid Gas's request should be approved at this time in whole or in part as consistent with public interest, policy and law.

WHEREFORE, for the reasons set forth herein, the Attorney General requests that the Commission grant his motion to intervene in this proceeding.

PATRICK C. LYNCH  
ATTORNEY GENERAL  
By his attorney,



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Leo J. Wold, # 3613  
Special Assistant Attorney General  
150 South Main Street  
Providence, RI 02903  
Tel. (401) 274-4400 ext. 2218  
Fax (401) 222-3016

**CERTIFICATE OF SERVICE**

I certify that a copy of the within motion was served by regular mail, postage prepaid, to all persons listed this date on the service list for PUC Docket Nos. 3943 on the 27<sup>th</sup> day of May, 2008.

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