

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

**IN RE:           REQUEST BY NATIONAL           :           Docket No. 3943**  
**GRID FOR CHANGE OF GAS       :**  
**DISTRIBUTION RATES            :**

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2009 MAY 27 PM 3:10  
PUBLIC UTILITIES COMMISSION

**MOTION OF THE NEW ENGLAND GAS WORKERS' ASSOCIATION  
TO INTERVENE**

The New England Gas Workers' Association ("NEGWA") hereby moves the Public Utility Commission ("PUC") to intervene as a full party in the above captioned matter pursuant to Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission. As grounds therefore, NEGWA states:

1. NEGWA, whose headquarters is located at 2 Hancock Street, Quincy, MA, 02171, is a region-wide umbrella organization representing the interests of its affiliates, local labor organizations, whose members work for various companies providing natural gas distribution services to New Englanders.

2. Local 12431 of the United Steelworkers of America is an affiliate member union of NEGWA. Local 12431 is the exclusive collective bargaining representative of certain individuals employed by National Grid's Rhode Island Natural Gas division.

3. Individuals represented by USW Local 12431 perform a broad spectrum of job duties for National Grid, including, but not limited to, system operations and maintenance, system pressure, emergency response and meter reading.

4. NEGWA, through its affiliate union, represents at least two hundred and twenty-five (225) National Grid workers throughout National Grid's Rhode Island service jurisdiction.

5. As made clear by National Grid's filing, NEGWA's affiliates and their respective members have an interest which may be directly and specifically affected by this proceeding, specifically, with regard to National Grid's Infrastructure Improvement Proposal, as outlined in the pre-filed direct testimony of Susan L. Fleck.

6. NEGWA's affiliate and its members have an interest which may be directly affected in ensuring that the National Grid's Request for Change of Gas Distribution Rates does not result in any degradation in service quality or system safety and reliability for Rhode Island consumers and, in fact, that service quality and system safety and reliability are, at the very least, maintained, if not improved, as a result of the changes (if any). The membership of the Local Union have a unique perspective inasmuch as many members have decades of knowledge and experience in the construction, maintenance and repair of the distribution system in the Providence Gas legacy area. Allowing NEGWA to bring this vast knowledge to the proceeding will assure a full, fair and open consideration of all issues related to the proposed Infrastructure Improvement Proposal and assure the best result for all parties, particularly the rate payers who are being asked to pay for the improvement proposal through higher rates.

7. NEGWA's affiliate and their members have an interest which may be directly affected in the Commission's inquiry into the impact the proposed changes in distribution rates will have on customer service. Specifically the Infrastructure Improvement Proposal will likely have a substantial impact on members' working conditions and may ultimately

degrade customer service. Thus, NEGWA, its affiliate and members have a substantial and specific interest in PUC's inquiry into National Grid's proposed change in distribution rates, and specifically to ensure that customer service is not degraded as a result of the proposed changes in working conditions.

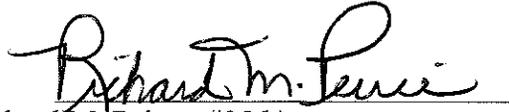
8. Overwhelmingly, the members of NEGWA's local union affiliate are also customers of National Grid. Thus, as consumers, any change in rates, degradation in customer service or system safety and reliability necessarily substantially and specifically affects the NEGWA membership.

9. Finally, in its capacity representing at least 225 employees employed by National Grid, NEGWA is in a unique position to provide evidence to the PUC's investigation, including, but not limited to, evidence concerning the effects the National Grid proposal will have on its members working conditions as well as the effects various oversight mechanisms the PUC may implement as a result of this investigation would have on NEGWA members. Hence, NEGWA has an interest which may be directly affected and which may not be adequately represented by existing parties and as to which they may be bound by the Division's actions in this proceeding. NEGWA's intervention will ensure that PUC's investigation has access to relevant information on the impact that the proposal, as well as any oversight mechanisms put in place by the Commission, will have on NEGWA's membership.

10. If NEGWA's motion is granted, NEGWA intends to present evidence concerning National Grid's current distribution system safety and reliability and customer service functions as well as evidence concerning the likely impact of the proposal on the same.

WHEREFORE, NEGWA respectfully requests that PUC grant its request to intervene as a full participant on this docket.

Respectfully submitted,  
The New England Gas Workers' Association,  
By Its Attorneys,

A handwritten signature in black ink, reading "Richard M. Peirce", written over a horizontal line.

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Dated: *May 27, 2008*

CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2008, I delivered a true copy of the foregoing document either by first class mail or by electronic mail to the Docket 3943 Service List as of May 27, 2008.

Patricia A. Allen