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OFFICE OF ENERGY RESOURCES

May 23, 2008

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

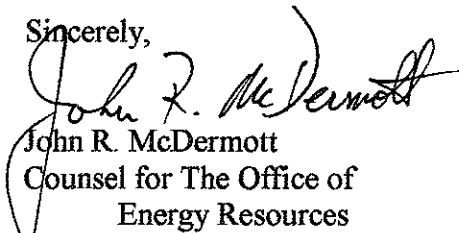
Re: Docket No. 3943 – National Grid (“NGrid”) – Application to implement new rates designed to collect additional revenue requirements in the amount of \$20.04 million or 4.6%

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 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. 3943 Service List

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID'S APPLICATION TO : DOCKET NO. 3943
CHANGE DISTRIBUTION RATES :

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.gov ; 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.

OER is presently an intervenor in Docket No. 3931, which deals with the proposed standards for energy efficiency and conservation procurement and system reliability filed with the Commission by Rhode Island Energy Efficiency and Resource Management Council. In the course of that proceeding, it has emerged that the Commission will be considering in this docket issues related to the decoupling of rates and sales volumes, issues whose outcome is also important to many other issues, programs, functions and duties with which OER is involved, including the standards proposed in Docket No. 3931. Accordingly, OER wishes to participate in and assist with the development of the Commission's ruling on the proposed decoupling standards and policies which will result from this proceeding, as well as any other matters which may affect OER's duties and responsibilities.


The Act further provides in section 39-1-27.9 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. As set forth above, 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.

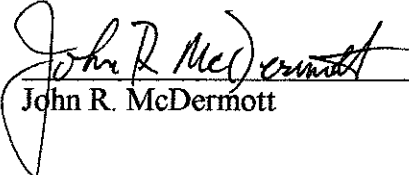
Respectfully submitted,
Rhode Island Office of Energy Resources
By Its Attorney,



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CERTIFICATE OF SERVICE

I hereby certify that on the 23rdst day of May, 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