

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

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

MOTION TO INTERVENE

The Petitioner, SilentSherpa Energy Consulting and Professional Services, Inc. (“SilentSherpa” or “Petitioner”), hereby petitions the Rhode Island Public Utilities Commission (“Commission”) 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 Commission. As grounds, SilentSherpa avers that National Grid failed to comply with the Commission’s Order (19115) arising out of Docket No. 3887 issued on October 30, 2007.

FACTS

1. On August 14, 2007, SilentSherpa filed a petition with the Division of Public Utilities and Carriers (“Division”) seeking to amend Section 5 of RIPUC NG No. 101.
2. SilentSherpa alleged that the existing non-firm sales tariff is unfair and should be replaced by a tariff that is based upon a more traditional cost of service plus an allowable return on investment pricing scheme.
3. The Division filed a response to SilentSherpa’s petition.
4. In response to the Division’s response, SilentSherpa files its petition with the Commission on September 11, 2007.
5. The Commission requested that NGrid respond to SilentSherpa’s petition. On September 28, 2007, NGrid filed its response with the Commission.
6. In its response, NGrid suggested that any consideration of restructuring of the tariff be addressed during the general rate case which must be filed no later than October 1, 2008.

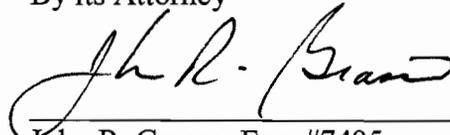
7. On October 11, 2007, the Commission considered SilentSherpa's petition at an Open Meeting. Docket No. 3887.
8. At the October 11, 2007 Open Meeting, the Commission noted that SilentSherpa may move to participate in the rate case as an intervener.
9. The Commission also ordered NGrid at its next general rate case to file with the Commission as part of its fully allocated cost of service study, and in addition to its value of service based non-firm rates, an alternative cost of service based rate design for non-firm service customers. Order 19115 dated October 30, 2007.
10. NGrid has subsequently filed its proposed Request for Change of Gas Distribution Rates.

CLAIMS

1. Petitioner alleges that NGrid has failed to comply with the Commission's Order of October 30, 2007 by failing to provide in its proposed Request for Change of Gas Distribution Rates an alternative cost of service based rate design for non-firm service customers which adequately addresses the concerns raised in SilentSherpa's September 11, 2007 petition.

WHEREFORE, based on the foregoing reasons, SilentSherpa respectfully requests that the Commission grant its Motion To Intervene in the above-captioned docket, with all rights associated therewith.

Respectfully submitted,
SilentSherpa Energy Consulting and
Professional Services, Inc.
By its Attorney



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CERTIFICATION

I, John R. Grasso, Esq., hereby certify that on April 24, 2008, I delivered a true copy of the foregoing Motion to Intervene either by first class mail or by email to:

National Grid – Request for Change in Gas Distribution Rates

Docket No. 3943 - Service List as of 4/24/08

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