



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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*Patrick C. Lynch, Attorney General*

June 5, 2008

*Via First Class Mail And Electronically*

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

**Re: National Grid – Standard Offer Rate Adjustment  
Filing – PUC Docket No. 3960**

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,

William K. Lueker (R.I. Bar # 6334)  
Special Assistant Attorney General  
Tel. (401) 274-4400 ext. 2299  
Fax (401) 222-3016

Encl.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**PUBLIC UTILITIES COMMISSION**

**IN RE: NATIONAL GRID – STANDARD )  
OFFER RATE ADJUSTMENT FILING )**

**DOCKET NO. 3960**

**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. The Attorney General acknowledges that, under Rule 1.13(f) of the Rules, when granted party status he will be bound by any agreements reached and orders entered in the proceedings prior to his intervention. At the pre-hearing conference in this matter hosted by the Public Utilities Commission on June 4, 2008, the Attorney General advised National Grid and the Division of Public Utilities and Carriers, the only two parties of record, of his interest in intervening in this matter and neither expressed an objection.

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 and of the Division of Public Utilities and Carriers (the “Division”) in the past. The instant proceeding may lead to yet another utility rate increase at a time when many rate-payers are already particularly hard-pressed to pay their electric and other utility bills. More to the point, we can reasonably expect that this will not be the last time National Grid seeks Standard Offer rate relief in view of constantly increasing fuel prices (a prime driving force behind the rise in the cost of providing electrical services to consumers). The current economic uncertainty, both locally and

nationally, and the Attorney General's common law duty to represent and protect the interests of the public as a whole, 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's requests 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,



William K. Lueker (R.I. Bar # 6334)  
Special Assistant Attorney General  
150 South Main Street  
Providence, RI 02903  
Tel. (401) 274-4400 ext. 2299  
Fax (401) 222-3016

June 5, 2008

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**CERTIFICATE OF SERVICE**

I certify that a copy of the within motion was served by regular mail, postage prepaid, as well as by electronic mail, to all persons listed this date on the service list for PUC Docket No. 3960 on the 5<sup>th</sup> day of June, 2005.

