



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 – Interim Gas Cost Recovery Filing –
PUC Docket No. 3961**

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 – INTERIM GAS)
COST RECOVERY FILING)**

DOCKET NO. 3961

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

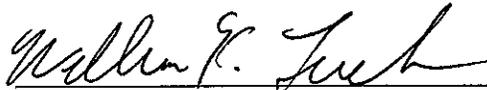
Pursuant to Rule 1.13 of the *Rules of Practice and Procedure* (the “Rules”) of the Public Utilities Commission (the “Commission”), Patrick C. Lynch, Attorney General of the State of Rhode Island, hereby moves to intervene with full-party status in the above-captioned proceeding. The Attorney General 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, the Division of Public Utilities and Carriers, and the Energy Council of Rhode Island, the only parties of record, of his interest in intervening in this matter and none 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 natural gas and other utility bills. More to the point, we can reasonably expect that this will not be the last time National Grid seeks rate relief in view of constantly increasing fuel prices. 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

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. 3961 on the 5th day of June, 2005.

