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RHODE ISLAND PUBLIC UTILITIES COMMISSION

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Members of Rhode Island
and Massachusetts Bars

April 17, 2009

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

Re: Docket No. 4041 – Narragansett Electric Company d/b/a National Grid's Standard Offer Procurement Plan and Renewable Energy Procurement Plan – National Grid's Accelerated Procurement Plan

Dear Luly:

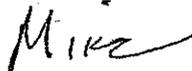
This office represents Constellation Energy Commodities Group, Inc. and Constellation NewEnergy, Inc. (Constellation).

On behalf of Constellation, enclosed please find an original and nine copies of a Motion to Intervene in the above-referenced proceeding.

Please time and date-stamp the extra copy of this letter and return it to me in the enclosed self-addressed, stamped envelope.

If you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,



Michael R. McElroy

cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: NARRAGANSETT ELECTRIC COMPANY :
d/b/a NATIONAL GRID'S STANDARD :
OFFER PROCUREMENT PLAN AND : Docket No. 4041
RENEWABLE ENERGY PROCUREMENT :
PLAN – NATIONAL GRID'S ACCELERATED :
PROCUREMENT PLAN :

MOTION TO INTERVENE OF
CONSTELLATION ENERGY COMMODITIES GROUP, INC.,
AND CONSTELLATION NEWENERGY, INC.

Pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission's ("Commission") Rules of Practice and Procedure, and the Commission's April 10, 2009 Notice of Hearing, Constellation Energy Commodities Group, Inc. ("CCG") and Constellation NewEnergy, Inc. ("CNE"), both collectively referred to herein as "Constellation," respectfully move to intervene as a full party in the above captioned proceeding, Docket 4041. In support of this Motion to Intervene, Constellation states as follows:

1. Constellation is a wholesale supplier of electric power to many of New England's electric utilities in connection with either their default or standard offer service obligations. In particular, CCG is a regular participant in default and standard offer service power supply solicitations, including those related to the Narragansett Electric Company d/b/a National Grid ("NEC"). In the past, CCG has been a successful bidder in NEC solicitations, and has an interest in potentially bidding in the NEC 2010 standard offer service and renewable energy procurement plan that is the subject of this proceeding.

2. CNE is a leading competitive supplier of electricity in the United States and is an electric retail supplier in 17 states, including Rhode Island, and two Canadian provinces.

3. CNE and CCG are subsidiaries of Constellation Energy Group, Inc., a North American energy company headquartered in Baltimore, Maryland which also owns Baltimore Gas and Electric Company, a regulated utility.

4. Service of any correspondence or pleadings in connection with this proceeding should be directed to:

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5. Rule 1.13(b) of the Commission’s Rules provides that “any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission.”

6. Rule 1.13(b)(2) explains that intervention is necessary or appropriate for a person when, for example, such person has “[a]n interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission’s action in the proceeding.”

7. On March 3 and 4, 2009, NEC submitted to the Commission its Standard Offer Supply ("SOS") and Renewable Energy Supply ("RES") Procurement Plans respectively. On March 18, 2009, the Commission issued Order No. 19602, in which the Commission found that neither the SOS nor the RES Procurement Plans were in compliance with the Commission's Rules and/or prior orders and rejected both filings. Further, the Commission directed NEC to file new SOS and RES Procurement Plans by April 16, 2009. Finally, On April 10, 2009, the Commission issued a Notice of Hearing initiating a hearing process in which the Commission will examine the propriety of NEC's proposed Accelerated Procurement Plan ("APP") for Rhode Island Residential and Small Commercial and Industrial Class customers ("Small Customer Class").

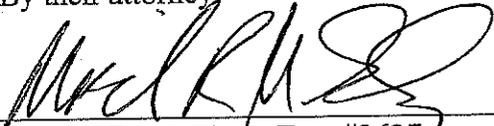
8. As an active wholesale supplier of electric power to many of New England's electric utilities, including NEC here in Rhode Island, and as a competitive electric supplier in Rhode Island, Constellation has unique interests in this proceeding that cannot be adequately represented by another party. As a result, Constellation has interests that may be directly affected by the outcome of this proceeding. Furthermore, Constellation's intervention and participation is in the public interest. Therefore, Constellation should be permitted to intervene and participate in these proceedings.

9. Accordingly, Constellation's intervention is necessary and appropriate pursuant to Rule 1.13(b)(2). Consistent with Rule 1.13(f) of the Commission's Rules of Practice and Procedure, Constellation agrees to be bound by the agreements reached and orders entered in the proceeding prior to this Motion to Intervene.

Wherefore, Constellation requests that the Commission grant this Motion to Intervene, and designate CCG and CNE as full parties to this proceeding with all the rights appropriate to that status.

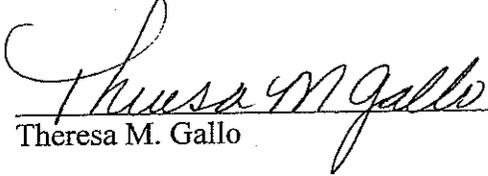
Respectfully submitted,
Constellation Energy Commodities Group, Inc.
and Constellation NewEnergy, Inc.
By their attorney

Dated: April 17, 2009


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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of April, 2009, I served a true copy of the foregoing on the attached service list:


Theresa M. Gallo

**Docket No. 4041 National Grid – SOS and RES Procurement Plans
Service List Updated 4/3/09**

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