

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID'S PROPOSED 2010 : DOCKET NO. 4041
STANDARD OFFER SUPPLY :
PROCUREMENT PLAN AND 2010 :
RENEWABLE ENERGY SUPPLY :
PROCUREMENT PLAN :

MOTION TO INTERVENE OF THE RHODE ISLAND OFFICE OF ENERGY
RESOURCES

The Rhode Island Office of Energy Resources (“OER”), under Rule 1.13 (b)(1) of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission (“Rules” and “Commission” respectively) and Rhode Island General Laws Section 39-1-27.9, hereby moves 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
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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 involved in the development of renewable energy projects and has regularly intervened in Commission proceedings, such as this proceeding, affecting such projects. Accordingly, OER wishes to participate in and assist with the development of the Commission’s rulings 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,

//s// John R. McDermott //s//
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of March, 2009, 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.

//s// John R. McDermott //s//
John R. McDermott