

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DIVISION OF PUBLIC UTILITIES AND CARRIERS

APPLICATION OF THE NARRAGANSETT)
ELECTIC COMPANY D/B/A NATIONAL GRID)
FOR APPROVAL OF A CHANGE IN ELECTIC) Dkt. No. 4065
BASE DISTRIBUTIONS RATES)

MOTION TO INTERVENE OF PATRICK C. LYNCH
ATTORNEY GENERAL

Pursuant to Rule 17, of the Rules of Practice and Procedure of the Division of Public Utilities and Carriers (“Division”) and Rule 1.3 of the Rules of Practice and Procedure of the Public Utility Commission (“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 and, in support of its motion, states as follows:

Introduction

Commission Rule of Practice and Procedure 1.13(b) specifically, dictates who may intervene in Commission proceedings.

Rule 1.13(b) states, in pertinent part, 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....”

Attorney General’s interest in this proceeding

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.

Moreover, the Attorney General, on a number of previous occasions has been granted full-party status in related Division and Commission proceedings.

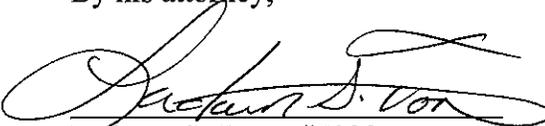
The Attorney General has a strong interest in evaluating the necessity and appropriateness of a request for an increase in rates. Further, in light of the State of Rhode Island's strained economic environment, the Attorney General contends that his attention and active participation in this proceeding is indisputably warranted, and essential to serving and protecting the public interest.

The Attorney General submits that his involvement will be helpful in determining whether the approval of the proposed application for a "Change in Electric Base Distribution Rates", in its entirety or in part, is consistent with the public interest. Thus, the Attorney General's intervention is necessary and appropriate under Rule 1.13(b) of the Rules of Practice and Procedure of the Commission.

Conclusion

WHEREFORE, for the reasons set forth herein, the Attorney General respectfully requests that the Commission grant his motion to intervene in this proceeding, with all rights associated therewith.

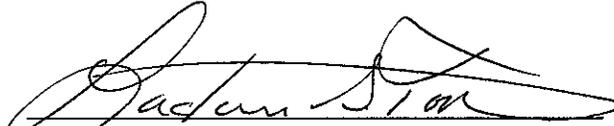
PATRICK C. LYNCH
ATTORNEY GENERAL
By his attorney,



Ladawn S. Toon #7980
Special Assistant Attorney General
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Providence, RI 02903
401-274-4400, ext.# 2299

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June, 2008 a copy of the within motion was served by electronic and first class mail, postage prepaid, upon the official Service List in this docket.



Ladawn S. Toon