

P R E N T I S S
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R. DANIEL PRENTISS
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July 20, 2009

Via First-Class and Electronic Mail

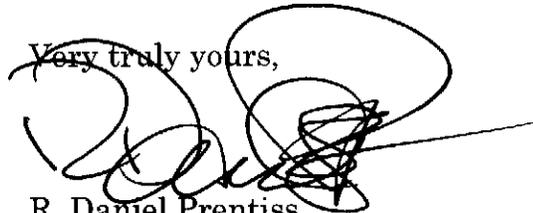
Luly E. Massaro, Commission Clerk
Rhode Island Public Utility Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 4065: Narragansett Electric Implementation of Rates

Dear Ms. Massaro:

I enclose the original and nine copies of the motion of the Rhode Island Energy Efficiency and Resources Management Council to intervene in the above proceedings.

Very truly yours,



R. Daniel Prentiss
EERMC Counsel

Cc: Service List
Enclosures
RDP/ka
874/92/4765

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: NARRAGANSETT ELECTRIC)
APPLICATION TO IMPLEMENT NEW RATES)

DOCKET NO. 4065

**MOTION TO INTERVENE OF THE RHODE ISLAND
ENERGY EFFICIENCY AND RESOURCES MANAGEMENT COUNCIL**

The Rhode Island Energy Efficiency and Resources Management Council (“EERMC” or “Council”), by its attorney, hereby moves under Rule 1.13 of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission (“Rules” and “Commission,” respectively) to intervene in the above-captioned proceeding and, in support of its motion, states as follows:

1. The EERMC has a right conferred by statute to intervene in this proceeding. Section 39-1-27.9 of the Rhode Island General Laws states that “in any Commission inquiry into or examination of matters that relate to or could potentially impact any programs, functions or duties of...the energy efficiency and resources management council, including but not limited to, those programs, functions and duties pursuant to this chapter and chapters 42-140, 42-140.1, 42-140.2, and 42-141” that the Council upon the formal request “shall be deemed” to be “an interested party for all purposes.”
2. The aforementioned Chapters, including 39-1 and 42-140.1, address least cost procurement and proposed standards for energy efficiency and conservation procurement and system reliability. As such, the Council has a right conferred by statute to intervene in this matter.
3. Rule 1.13 (b)(1) establishes that those with a right conferred by statute may intervene in such dockets. In this regard the EERMC’s intervention is necessary and appropriate under Rule 1.13(b)(1) of the Rules as established in the paragraphs above.

Service of any correspondence or pleadings in connection with these matters should be directed to:

Samuel P. Krasnow (EERMC Voting Member)
203 S. Main Street
Providence, RI 02903
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and

S. Paul Ryan (EERMC Voting Member)
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Riverside, RI 02915-2640
spryan@eplaw.necoxmail.com

and

R. Daniel Prentiss
One Turks Head Place, Suite 380
Providence, RI 02903
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WHEREFORE, the EERMC asks that its motion to intervene be granted.

Respectfully submitted,

THE RHODE ISLAND ENERGY EFFICIENCY AND
RESOURCES MANAGEMENT COUNCIL

By its attorney,
/s/ R. Daniel Prentiss

R. Daniel Prentiss
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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2009, I delivered a true copy of the foregoing document either by first class mail or by electronic mail to the Docket 4065 Service List as of July 17, 2009.

/s/ R. Daniel Prentiss

R. Daniel Prentiss