STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: NARRAGANSETT ELECTRIC APPLICATION TO IMPLEMENT NEW RATES	))))	DOCKET NO. 4065

MOTION TO INTERVENE OF ENVIRONMENT NORTHEAST

By its attorney, Environment Northeast ("ENE"), hereby moves pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules") to intervene in the above-captioned proceeding and, in support of its motion, states:

1. ENE is a non-profit organization which researches and addresses environmental problems that threaten regional ecosystems, human health and the management of natural resources.
2. Rule 1.13(b) of the Commission Rules of Practice and Procedure states "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."
3. Further, Rule 1.13(b)(2) goes on to state that such a right or interest may be "an interest which may be directly affected and which is not adequately represented by existing parties."
4. On June 1, 2009, National Grid ("Grid" or the "Company") filed an "Application for Approval of a Change in Electric Base Distribution Rates Pursuant to R.I.G.L. §§ 39-3-10 and 39-3-11." The Company's application contains a proposed revenue decoupling mechanism "designed to eliminate the financial barriers that currently exist to achieving [energy efficiency] goals and

places the Company in a more stable financial position to fully engage in the implementation of these important [energy efficiency] policy initiatives." [1]

5. ENE has considerable experience and expertise in matters relating to Rhode Island energy policy as well as the close relationship between decoupling and energy efficiency program delivery. ENE is a participant in the Rhode Island demand-side management collaborative for electric and natural gas efficiency programs, has a staff member who has been appointed to the RI Energy Efficiency and Resources Management Council.
6. In addition, ENE is a member of the Energy Conservation Management Board which reviews the planning and implementation of gas and electric utility energy efficiency programs for the State of Connecticut, and has been appointed to Massachusetts' Energy Efficiency Advisory Council.
7. ENE has been active in Rhode Island and other New England states in researching and promoting energy efficiency and other demand side measures to mitigate environmental harm and reduce costs for energy consumers.
8. ENE has participated actively in public utility dockets relating to revenue decoupling in Rhode Island, Connecticut, Massachusetts and New Hampshire. In addition, ENE experts have written extensively about the link between energy efficiency programs and decoupling mechanisms, including our 2006 Climate Change Roadmap for New England and Eastern Canada.[2] ENE believes that its research and experience will be helpful in the Commission's consideration of the issues in this docket.
9. ENE's interests are directly affected by the issues in this proceeding and cannot be adequately represented by any other party. ENE spends considerable time, effort, and monetary resources working to ensure that least cost energy efficiency resources are procured in Rhode Island,

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[1] Transmittal Letter of National Grid Counsel Thomas R. Teehan, June 1, 2009, at 2.
[2] *See* http://www.env-ne.org/public/resources/pdf/RoadmapSummary.pdf

Massachusetts, Connecticut, and Maine to mitigate environmental harm, including those associated with climate change and local air pollution, while reducing costs for energy consumers. ENE has unique expertise in this matter that is not adequately represented by other parties and ENE's interests are directly affected by this proceeding.

10. Rule 1.13(b)(3) states that such a right or interest to intervene may be "any other interest of such nature that movant's participation may be in the public interest." ENE's staff has a combined several decades of experience on the importance of decoupling to effective energy efficiency program delivery and has the capacity and organizational commitment to provide a detailed analysis of the proposed decoupling mechanism. As such, ENE's participation in this proceeding is in the public interest.
11. In a May 1, 2008 Order in Superior Court Case No. 08-2705, ENE attorney Roger E. Koontz has been admitted *pro hac vice* for "Public Utilities Commission Least Cost Procurement Docket 3931 and Subsequent Dockets Related to Efficiency, Distributed Resources and Rate Mechanisms."
12. In a May 1, 2008 Order in Superior Court Case No. 08-2706, ENE attorney Jeremy C. McDiarmid has been admitted *pro hac vice* for "Public Utilities Commission Least Cost Procurement Docket 3931 and Subsequent Dockets Related to Efficiency, Distributed Resources and Rate Mechanisms."
13. Accordingly, ENE's intervention is necessary and appropriate under Rule 1.13(b)(2) and Rule 1.13(b)(3) of the Rules.

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

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WHEREFORE, based on the foregoing reasons, ENE asks that the Commission grant its Motion to Intervene.

Respectfully submitted,

ENVIRONMENT NORTHEAST

By its attorneys,

/s/ Jeremy C. McDiarmid

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CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2009, I delivered a true copy of the foregoing document either by first class mail or by electronic mail to the Docket 3943 Service List as of July 16, 2009.

/s/ Jeremy C. McDiarmid

Jeremy C. McDiarmid