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October 30, 2009

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

Re: Michael Delia and Maggie Delia
PUC Docket No. 4111
Review of Proposed Town of New Shoreham
Project Pursuant to R.I.G.L. 39-26.1-7

Dear Ms. Massaro,

Enclosed herewith you will find an original and nine copies of Michael Delia and Maggie Delia Motion of Michael Delia and Maggie Delia to Intervene in the above matter. If you have any questions, please feel free to contact me.

Regards,

Joseph J. McGair (2/8/09)
Joseph J. McGair, Esq.

JJM:ld
Enclosures
Hand-Delivered

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: REVIEW OF PROPOSED TOWN OF
NEW SHOREHAM PROJECT PURSUANT
TO R.I.G.L. 39-26.1-7

DOCKET NO. 4111

MOTION OF MICHAEL DELIA AND MAGGIE DELIA TO INTERVENE

Now comes Michael Delia and Maggie Delia pursuant to Section 1.13 of the Rules of Practice and Procedure of the Rhode Island Public Utilities Commission and hereby files their motion to intervene in the above-captioned matter. Michael Delia and Maggie Delia aver and submit the following in support of their Motion:

1. Michael Delia and Maggie Delia are property owners in the Town of New Shoreham.
2. Michael Delia and Maggie Delia purchase their power supply from Block Island Power Company.
3. The proposal of National Grid represents a substantial increase in the price of electrical power which will be passed on to Michael Delia and Maggie Delia as residential customers.
4. The interests of Michael Delia and Maggie Delia as residential customers would be directly affected by the granting of the proposal and such interests are not adequately represented by existing parties. Further, Michael Delia and Maggie Delia may engage certain experts including but not limited to a power market analyst. Further and consistent with the Rules of Practice and Procedure of the Public Utilities Commission and Section 1.13 thereof, Michael Delia and Maggie Delia believe that their intervention is in the public interest.

WHEREFORE, Michael Delia and Maggie Delia hereby make their Motion that the Rhode Island Public Utilities Commission allow them to intervene as parties in this docket.

Respectfully submitted,
Michael Delia and Maggie Delia
By their attorneys

Joseph J. McGair (Att)

Joseph J. McGair #0304
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Warwick, RI 02886
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CERTIFICATE OF SERVICE

In accordance with Rule 1.7D of the Rules of Practice and Procedure of the Public Utilities Commission, I hereby certify that on the 30th day of October, 2009, a copy of the within Motion was mailed electronically to the attached service list.

Synda V. Deloga

National Grid – Review of Proposed Town of New Shoreham Project
Docket No. 4111 Service List Updated 10/29/09

Name/Address	E-mail Distribution	Phone/FAX
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