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May 18, 2012

Luly Massaro
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888


Re: Woonsocket Water Division – Docket No. 4320

Dear Luly:

Enclosed are an original and nine copies of the Town of North Smithfield's Motion to Intervene.

If you have any questions, please feel free to call.

Very truly yours,


Michael R. McElroy

MRMc:tmg

cc: Service List
William Savastano, Esq.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: WOONSOCKET WATER DIVISION : DOCKET No. 4320
GENERAL RATE FILING :

MOTION OF THE TOWN OF NORTH SMITHFIELD
TO INTERVENE AS A FULL PARTY

Now come the Town of North Smithfield (Town), by its undersigned counsel, and pursuant to Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission (Commission), hereby moves to intervene as a full party in this matter.

1. The Town and some of its residents are customers of Woonsocket Water Division (WWD).
2. The increase sought by WWD will directly and adversely affect the Town and its residents.
3. If this rate increase is approved as filed, wholesale customers of WWD, including the Town, would see a rate increase of 25%.
4. The Town is opposed to the requested revenue increase in the amount of \$813,326, which the Town believes is excessive.
5. Commission Rule 1.13 provides 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.” The Rule goes on to further state that such a right or an interest may be:

“an interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission’s action in the proceeding. (The following may have such an interest: consumers served by the applicant . . .).” (Emphasis added).


10. Rule 1.13 also provides that such right or interest may be “any other interest of such nature that movant’s participation may be in the public interest.”

11. As shown above, the Town represents wholesale and retail consumers served by the applicant. The Town and its ratepayers are therefore directly affected by WWD’s filing.

Accordingly, the Town of North Smithfield, pursuant to Rule 1.13, hereby moves for intervention as a full party in this matter.

Dated: May 18, 2012

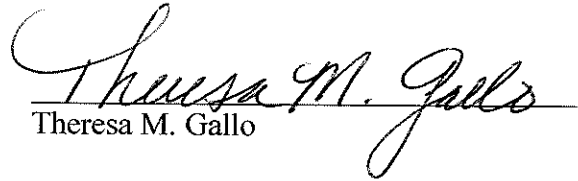
Respectfully submitted,
Town of North Smithfield
By its attorney



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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of May, 2012, I mailed a true copy of the foregoing by first class mail to the attached service list.


Theresa M. Gallo

North Smithfield/4320/Motion to Intervene

**Woonsocket Water Division - Docket No. 4320 – Rate Filing
Service List 5/17/12**

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