



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Administration
DIVISION OF LEGAL SERVICES
One Capitol Hill, 4th Floor
Providence, RI 02908-5890

Tel: (401) 222-8880
Fax: (401) 222-8244

September 24, 2013

SENT VIA FIRST CLASS MAIL AND ELECTRONIC MAIL:

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

RE: DOCKET NO. 4442 – Rhode Island's Office of Energy Resources' Motion to Intervene on the Matter of Tariff Advice Filing for Customer-Owned Street & Area Lighting Proposal ("Motion to Intervene")

Dear Ms. Massaro:

Please see attached filing (an original plus ten (10) copies) pertaining to the above mentioned matter.

Sincerely,

Daniel W. Majcher, Esq.

DWM/njr

Enclosure

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: TARIFF ADVICE FILING FOR)
CUSTOMER-OWNED STREET & AREA)
LIGHTING PROPOSAL)

DOCKET NO. 4442

MOTION TO INTERVENE
BY THE RHODE ISLAND OFFICE OF ENERGY RESOURCES

By its attorneys, the Rhode Island Office of Energy Resources (“OER”), hereby moves to intervene in the above-captioned proceeding pursuant to Rule 1.13 (a) and (b) of the Rhode Island Public Utilities Commission (“PUC”) Rules of Practice and Procedure (“Rules”). In support of this motion, OER provides:

1. OER is the Rhode Island State agency responsible for implementing and overseeing the state's energy policies and programs. The OER was created by the General Assembly in 2006.
2. Rule 1.13 allows for any person claiming an interest of such nature that intervention is necessary or appropriate to submit a motion to intervene in any proceeding before the PUC.
3. Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.
4. R.I. Gen. Laws § 39-30-3, as enacted, Municipal Street Light Investment Act (“Act”), House Bill No. 5935 Sub A, requires the “electric distribution company” to consult with the “Office” regarding the tariff filing submission. R.I. Gen. Laws § 39-30-2, as enacted, defines “Office” to mean Office of Energy Resources. Therefore, by the express inclusion of OER in the statute, OER is inherently an interested party requiring representation before the PUC in the above mentioned matter.

5. It is necessary and appropriate to grant OER's motion to intervene because OER has an interest that is directly affected by this proceeding and is not adequately represented by the existing parties.

6. In this proceeding, OER will advocate for positions that are entirely consistent with the public interest as manifest by the Act and other public policy. These interests include, but are not limited to, energy policy and programmatic matters that impact municipalities.

WHEREFORE, based on the reasons stated herein, the Office of Energy Resources ("OER") respectfully requests that the Rhode Island Public Utilities Commission grant this motion and allow the OER to intervene.

Please direct service of any correspondence or pleadings in connection with this proceeding to:

Chris Kearns
Chief, Program Development
Rhode Island Office of Energy Resources
One Capitol Hill, 4th Floor
Providence, R.I., 02908
P:401.574.9113
F:401.574.9125
Christopher.kearns@energy.ri.gov

Daniel W. Majcher, Esq.
R.I. Department of Administration
Division of Legal Services
One Capitol Hill, 4th Fl.
Providence, RI 02908
Tel: (401) 222-8880
Fax: (401) 222-8244
daniel.majcher@doa.ri.gov

Respectfully Submitted,
The OFFICE OF ENERGY RESOURCES,

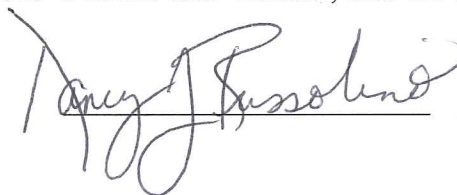
By their Attorney,



Daniel W. Majcher, Esq. (#7265)
R.I. Department of Administration
Division of Legal Services
One Capitol Hill, 4th Fl.
Providence, RI 02908
Tel: (401) 222-8880
Fax: (401) 222-8244

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2013, I mailed this original pleading and 9 copies to the PUC and sent a true copy of the document by electronic mail to the parties, the Office of Energy Resource, National Grid, The Division of Public Utilities and Carriers, and the Rhode Island Office of the Attorney General.

A handwritten signature in cursive script, reading "Nancy J. Russell", is written over a horizontal line.