



4. In the mid-1980's the League created the RI Interlocal Risk Management Trust, a member-owned, intergovernmental risk management pool. Today the "Trust" is the premier provider of risk management programs and insurance coverages for most cities, towns, school districts, libraries, housing authorities, fire and special service districts.
5. Rule 1.13 states any person claiming an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the PUC. Further, Rule 1.13(e) provides that where there is no objection to intervention a properly filed and served motion to intervene shall be granted.
6. It is necessary and appropriate to grant the League the right to intervene in this proceeding. The League represents the interest of numerous municipalities that are directly affected by this proceeding and are not adequately represented by the existing parties. The League plans to assist its member communities in the implementation of the streetlight purchases and management contemplated by the Act.
7. In this proceeding the League will advocate for positions that are consistent with the public interest as manifest in the Act and other public policy. These interests include, but are not limited to, job creation, stable energy pricing, enhanced streetlight efficiency, improved streetlight management, reduced municipal energy costs, a sustainable Rhode Island economy and environmental benefits. In these ways, the League, its member communities and the citizens of Rhode Island all have currently unrepresented interests in this proceeding that will be represented by this intervenor.

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

Dan Beardsley  
Executive Director  
The RI League of Cities and Towns  
One State Street, Suite 502

Providence, RI 02908  
Phone: (401) 272-3434  
[dan@rileague.org](mailto:dan@rileague.org)

and

Seth H. Handy  
Handy Law, LLC  
42 Weybosset Street  
Providence, RI 02903  
Phone: (401) 626-4839  
E-mail [seth@handylawllc.com](mailto:seth@handylawllc.com)

WHEREFORE, based on the foregoing reasons, the League asks that the PUC grant this Motion to Intervene.

Respectfully submitted,

THE RHODE ISLAND LEAGUE OF CITIES  
AND TOWNS

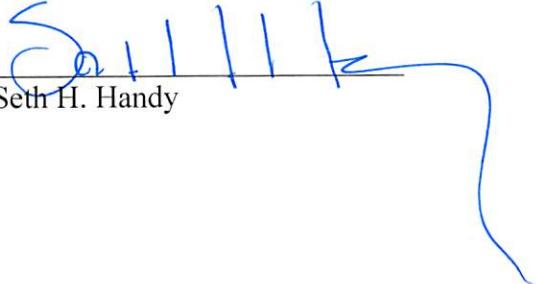
By their attorney,



Seth H. Handy (#5554)  
HANDY LAW, LLC  
42 Weybosset Street  
Providence, RI 02903  
Tel. 401.626.4839  
E-mail [seth@handylawllc.com](mailto:seth@handylawllc.com)

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2013, I mailed this original pleading and 9 photocopies to the PUC and sent a true copy of the document by electronic mail to the parties, the Office of Energy Resources, National Grid, The Division of Public Utilities and Carriers Advocacy Section and the Rhode Island Office of the Attorney General.



Seth H. Handy