

**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 WASHINGTON COUNTY REGIONAL PLANNING COUNCIL

By its attorneys, the Washington County Regional Planning Council (WCRPC), 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). WCRPC has contacted the parties to this proceeding pursuant to PUC Rule 1.15(b) and as of the time of this filing is not aware of any objection to this motion. In support of this motion, WCRPC states:

1. WCRPC is a coalition of municipalities (North Kingstown, South Kingstown, Exeter, Narragansett, Charlestown, Richmond, Westerly, and New Shoreham) that employs a coordinated approach to more effectively address issues that transcend municipal boundaries. WCRPC is comprised of one town council member from each of the nine towns within the county, and serves as a unique forum for inter-municipal communication, coordination and cost-sharing.
2. 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.
3. 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.
4. It is necessary and appropriate to grant WCRPC the right to intervene in this proceeding. WCRPC has an interest that is directly affected by this proceeding and is not adequately represented by the existing parties. WCRPC was instrumental in the development and passage of

Rhode Island Municipal Streetlight Investment Act, R.I.G.L § 39-29-1, et. seq. (the “Act”)
(House Bill No. 5935 Sub A) and plans to assist its member communities in the implementation
of the streetlight purchases and management contemplated by the Act.

5. In this proceeding WCRPC will advocate for positions that are entirely 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, WCRPC, its member communities and the residents of Washington County 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:

Jeff Broadhead
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and

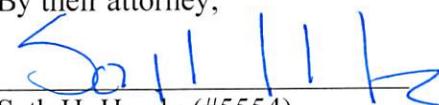
Seth H. Handy
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42 Weybosset Street
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WHEREFORE, based on the foregoing reasons, WCRPC asks that the PUC grant this Motion to Intervene.

Respectfully submitted,

THE WASHINGTON COUNTY REGIONAL
PLANNING COUNCIL

By their attorney,



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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

