



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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*Peter F. Kilmartin, Attorney General*

April 3, 2015

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

**RE: 2016 Standard Offer Service Procurement Plan and 2016 Renewable Energy  
Standard Procurement Plan – Docket No. 4556**

Dear Ms. Massaro:

Enclosed for filing, please find the original plus nine (9) copies of the enclosed Attorney General Peter F. Kilmartin's Motion to Intervene in this matter.

Please note that an electronic copy of this filing has been sent to the service list. No hard copies will be mailed to service list members unless otherwise requested.

If you have any questions, please do not hesitate to call. Thank you.

Very truly yours,

Christy Hetherington  
Special Assistant Attorney General  
Extension 2425

Enclosure

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

<b>IN RE: 2016 STANDARD OFFER SERVICE</b>	)	
<b>(SOS) PROCUREMENT PLAN and</b>	)	<b>Docket No.: 4556</b>
<b>2016 RENEWABLE ENERGY STANDARD</b>	)	
<b>(RES) PROCUREMENT PLAN</b>	)	

**MOTION TO INTERVENE OF PETER F. KILMARTIN,**  
**ATTORNEY GENERAL**

Pursuant to Rule 1.13, of the Rules of Practice and Procedure of the Public Utilities Commission (“Commission”), Peter F. Kilmartin, Attorney General of the State of Rhode Island, hereby moves to intervene with full-party status in the above-captioned proceeding.

Under common law, the Attorney General is the representative of the public, empowered to bring actions to redress grievances suffered by the public as a whole. The proposed procurement plans for both Standard Offer Service (SOS) and Renewable Energy Standard (RES) have significant long-term impacts on the public interest. The Attorney General submits that his participation will assist the Commission in its determination as to whether the (SOS) and (RES) procurement plans are consistent with the public interest.

WHEREFORE, for the reasons set forth herein, the Attorney General requests that the Commission grant his motion to intervene in this proceeding.

PETER F. KILMARTIN  
ATTORNEY GENERAL  
By his attorney,



Christy Hetherington, # 6693  
Special Assistant Attorney General  
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CERTIFICATE OF SERVICE

I certify that a copy of the within Motion to Intervene was electronically forwarded to all persons listed on the Service list attached hereto on the 3rd day of April, 2015.



**Docket No. 4556 - National Grid – 2016 Standard Offer Service (SOS) and Renewable Energy Standard (RES) Procurement Plans**  
**Service List updated 4/2/15**

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