



**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**Department of Administration**  
DIVISION OF LEGAL SERVICES  
One Capitol Hill, 4<sup>th</sup> Floor  
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July 15, 2015

**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: National Grid Rate Design Plan – Docket No. 4568

Dear Ms. Massaro:

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

Sincerely,

Daniel W. Majcher, Esq.

DWM/njr

Enclosure

c. Docket List - 4568

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

**IN RE: NATIONAL GRID'S RATE DESIGN PLAN DOCKET NO. 4568**

**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. It is necessary and appropriate to grant OER's motion to intervene because OER has an interest that is directly affected by this proceeding.

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:

Marion Gold  
Commissioner  
Rhode Island Office of Energy Resources  
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Respectfully Submitted,  
The OFFICE OF ENERGY RESOURCES,

By their Attorney,



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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2015, I mailed this original pleading and 10 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.

