



**S. Paul Ryan**  
attorney & counsellor at law

August 31, 2016

Public Utilities Commission  
Attn: Luly Massaro, Clerk  
89 Jefferson Boulevard  
Warwick, RI 02888

**In re: The Narragansett Electric Company d/b/a National Grid Request For  
Approval of a Gas Capacity Contract and Cost Recovery Pursuant to R.I.  
Gen. Laws §39-31-1 to 9**

Dear Ms. Massaro:

Enclosed please find for filing an original and ten (10) copies of Tec-RI's *Motion For Intervention Of The Energy Council Of Rhode Island*.

Should you have any questions, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "S. Paul Ryan".

S. Paul Ryan, Esq.

SPR/awb  
Enclosures

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

**IN RE: THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a NATIONAL GRID REQUEST FOR APPROVAL OF  
A GAS CAPACITY CONTRACT AND COST RECOVERY  
PURSUANT TO R.I. GEN. LAWS §39-31-1 TO 9**

**DOCKET No. 4627**

**MOTION FOR INTERVENTION OF THE ENERGY COUNCIL OF RHODE ISLAND**

NOW COMES TEC-RI by its undersigned counsel, and, pursuant to the Notice of Pre-Hearing Conference, Intervention Deadline, and Public Comment Hearing from the Public Utilities Commission (“Commission) dated July 8, 2016, hereby moves to intervene in this matter.

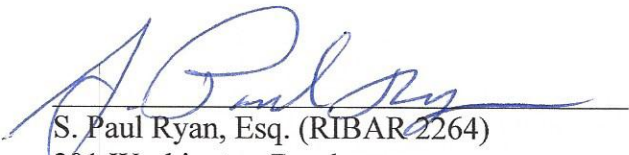
1. The Energy Council of Rhode Island (hereinafter referred to as “TEC-RI”) is a non-profit membership organization in good standing of the laws of the State of Rhode Island.
2. The primary purpose of TEC-RI is to advocate for the interests of its members (described by various Rhode Island Statutes and Regulations as “large commercial and industrial” ratepayers).
3. Its members are some of the largest power users in the State of Rhode Island, and as such are dramatically impacted by rates and energy policies.
4. The interests of residential taxpayers are represented by the Division of Public Utilities and Carriers and the Attorney General. The interests of industrial and large commercial ratepayers in Rhode Island are represented by the Energy Council of Rhode Island (“TEC-RI”).
5. As such, TEC-RI respectfully moves to intervene as a full party in this docket.
6. TEC-RI intends to submit written comments and, occasionally, to cross-examine witnesses.

7. Commission Rule 1.13 provides, in pertinent part, that “any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission.”

8. Rule 1.13 also provides that such right or interest may be “any other interest of such nature that movant’s participation may be in the public interest.”

WHEREFORE, pursuant to Rule 1.13, TEC-RI respectfully moves for intervention as a full party in this matter.

Respectfully submitted,  
TEC-RI,  
By its Attorney,



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#### CERTIFICATION

I hereby certify that on the 31<sup>st</sup> day of August, 2016, a true and original copy of the within document was emailed via e-filing to the following:

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