



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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Patrick C. Lynch, Attorney General

April 7, 2006

Luly Massaro, Clerk
Division of Public Utilities and Carriers
89 Jefferson Blvd.
Warwick, RI 02888

Re: Joint Petition for Purchase and Sale of Assets by The Narragansett Electric Company and Southern Union Company, Docket No. D-06-13

Dear Ms. Massaro:

Enclosed for filing in the above-captioned proceeding are an original and five (5) copies of the Motion to Intervene of Patrick C. Lynch, Attorney General of the State of Rhode Island. Thank you for your attention to this matter.

Very truly yours,

Paul J. Roberti
Assistant Attorney General
Chief, Regulatory Unit

Encl.
cc: Service List

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
BEFORE THE DIVISION OF PUBLIC UTILITIES AND CARRIERS**

In Re: Joint Petition for Purchase and)
 Sale of Assets by The Narragansett)
 Electric Company and Southern) Docket No. D-06-13
 Union Company)

MOTION TO INTERVENE OF PATRICK C. LYNCH
ATTORNEY GENERAL OF THE STATE OF RHODE ISLAND

In accordance with Rule 17(b)(1) of the Division’s Rules of Practice and Procedure, Patrick C. Lynch, Attorney General of the State of Rhode Island (“Attorney General”), hereby moves to intervene with full-party status in the above-captioned proceeding.

I. Petitioner Patrick C. Lynch, Attorney General of the State of Rhode Island, is, pursuant to § 42-9-6 of the General Laws of Rhode Island of 1956, as amended, the “legal advisor of all state boards, divisions, departments, and commissions and the officers thereof . . .” Under the common law, he is the representative of the public, empowered to bring actions to redress grievances suffered by the public as a whole. The Attorney General has been granted full-party status in prior Division cases involving public utility mergers and acquisitions, and has previously intervened in proceedings before the Public Utilities Commission involving the public utility operations of the Applicants in this proceeding.

- II. The Narragansett Electric Company d/b/a National Grid (“Narragansett”) and Southern Union Company filed a joint Petition seeking the approval of the Division of Public Utilities and Carriers for the purchase by Narragansett of the assets associated with the regulated gas distribution business owned and operated by Southern Union Company in Rhode Island (d/b/a New England Gas Company). The Petition was filed pursuant to Sections 39-3-24, 39-3-25, and 39-3-26 of the General Laws and the Applicants request the Division’s approval consistent with those provisions. In addition, the Petition requests the Division to accept for filing under Section 39-3-10 of the General Laws, the tariffs of New England Gas Company with the name-change to reflect the purchase of the assets by Narragansett.
- III. The Attorney General seeks to ensure that National Grid’s acquisition does not negatively impact service quality, provides benefits to customers in terms of rates impacts, and does not otherwise conflict with the public interest. Furthermore, the issues of severance payments for high level executives, recovery of acquisition premiums in rates, impacts on system reliability, and ensuring that National Grid’s acquisition results in each Applicant’s compliance with applicable state, local, federal laws and regulations are matters that bear directly on the public interest.

WHEREFORE, for the reasons set forth herein, the Attorney General requests that the Division of Public Utilities and Carriers grant his Motion to Intervene in this proceeding.

Respectfully submitted,

PATRICK C. LYNCH
ATTORNEY GENERAL OF THE
STATE OF RHODE ISLAND

By his attorney,



Paul J. Roberti
Assistant Attorney General
Department of Attorney General
150 South Main Street
Providence, RI 02903
(401) 274-4400 x2231

DATED: April 7, 2006

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the within document was served this 7th day of April, 2006 via first class mail, postage prepaid, upon each person designated on the official service list in this proceeding.



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