

STATE OF RHODE ISLAND
AND PROVIDENCE PLANTATIONS

DIVISION OF PUBLIC UTILITIES AND CARRIERS

NARRAGANSETT ELECTRIC CO. SOUTHERN UNION CO.))))	Docket No. D-06-13 Joint Petition for the Purchase and Sale of Assets
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PETITION TO INTERVENE BY
THE ENERGY COUNCIL OF RHODE ISLAND

The Energy Council of Rhode Island (TEC-RI) in its own name and on behalf of its members hereby petitions to intervene in the above-entitled case and states as follows:

1. TEC-RI is an unincorporated, non-profit organization of large users of electricity within the service territories of both Narragansett Electric Company and Southern Union's Rhode Island affiliate, the New England Gas Company.
2. TEC-RI and its members will be specifically affected by the above Docket. The purchase needs to be reviewed for its impact on service levels, cost structures, marketplace dynamics, and customer offerings.
3. TEC-RI seeks intervenor status in order to participate in hearings and discussions regarding all matters pertaining to this Docket.
4. All correspondence to TEC-RI should be addressed as follows:

Mr. John Farley
Executive Director
The Energy Council of Rhode Island
One Richmond Square, Suite 340D
Providence, RI 02906
401-621-2240
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E-MAIL: execdir@tecri.org

WHEREFORE, knowing of no objection, The Energy Council of Rhode Island respectfully requests that this Petition to Intervene be allowed.

DATED: April 10, 2006

John Farley
Executive Director, TEC-RI