



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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*Patrick C. Lynch, Attorney General*

September 7, 2005

*Via First Class Mail And Electronically*

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

**Re: Narragansett Electric Company Standard Offer Rate  
Adjustment Filing – PUC Docket No. 3689**

Dear Ms. Massaro:

Enclosed for filing please find an original and nine (9) copies of the Motion to Intervene of Patrick C. Lynch, Attorney General, for filing in the above-referenced proceeding.

Thank you for your attention to this matter.

Sincerely,

William K. Lueker (R.I. Bar # 6334)  
Special Assistant Attorney General  
Tel. (401) 274-4400 ext. 2299  
Fax (401) 222-3016

Encl.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**PUBLIC UTILITIES COMMISSION**

**IN RE: NARRAGANSETT ELECTRIC )**  
**COMPANY STANDARD OFFER RATE ) DOCKET NO. 3689**  
**ADJUSTMENT FILING )**

**MOTION TO INTERVENE OF**  
**PATRICK C. LYNCH, ATTORNEY GENERAL**

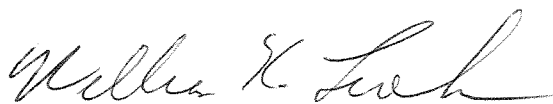
Pursuant to Rule 1.13 of the *Rules of Practice and Procedure* (the “Rules”) of the Public Utilities Commission (the “Commission”), Patrick C. Lynch, Attorney General of the State of Rhode Island, hereby moves to intervene with full-party status in the above-captioned proceeding. The Attorney General acknowledges that, under Rule 1.13(f) of the Rules, when granted party status he will be bound by any agreements reached and orders entered in the proceedings prior to his intervention. The Attorney General has contacted all of the other parties on the service list in this docket, and has been advised that they do not object to this intervention.

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 Attorney General has been granted full-party status in similar and/or related proceedings of the Commission and of the Division of Public Utilities and Carriers (the “Division”) in the past. The instant proceeding may lead to yet another utility rate increase at a time when many rate-payers are already particularly hard-pressed to pay their electric and other utility bills. More to the point, we can reasonably expect that Narragansett Electric may now need to seek additional rate relief. Since the August 18, 2005, deadline for filing for intervenor status in this proceeding, fuel prices (a prime driving force behind the rise in the cost of providing electrical services to consumers) has increased sharply, a situation that has been made even worse by economic disruptions caused by

Hurricane Katrina just a week ago.<sup>1</sup> These changed circumstances, and the Attorney General's common law duty to represent and protect the interests of the public as a whole in this time of great economic uncertainty, require the Attorney General to seek intervention in this matter. The Attorney General submits that his participation in this matter will assist the Commission in its determination as to whether or not Narragansett Electric's requests should be approved at this time in whole or in part as consistent with public interest, policy and law.

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

PATRICK C. LYNCH  
ATTORNEY GENERAL  
By his attorney,



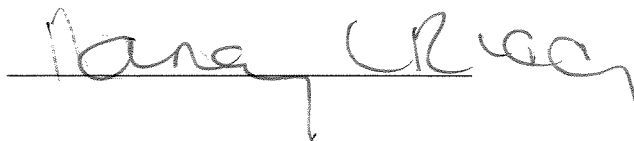
William K. Lueker (R.I. Bar # 6334)  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the within motion was served by regular mail, postage prepaid, to all persons listed this date on the service list for PUC Docket No. 3689 on the 7th day of September, 2005.



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<sup>1</sup> Indeed, the recent increase in gasoline prices – which has a direct impact on Narragansett Electric's cost of maintaining its transmission and distribution lines – is now the subject of a national investigation in which this Department is actively involved. See "Lynch announces that RI will join national investigation into spiking gas prices" released 2005-09-02, attached.