

Gerald J. Petros
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February 22, 2007

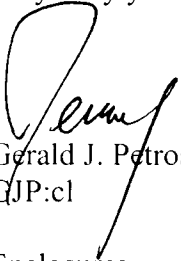
Luly E. Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**Re: City of Newport Water Division Rate Filing
Docket No. 3818**

Dear Luly:

I enclose an original and nine copies of the Portsmouth Water and Fire District's Motion to Intervene for filing. I have spoken with counsel for Newport and they have no objection to our motion to intervene.

Very truly yours,



Gerald J. Petros
GJP:cl

Enclosures

cc: Service List

784698v1 (95000/9501000)

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
BEFORE THE PUBLIC UTILITIES COMMISSION

IN RE: THE CITY OF NEWPORT, :
UTILITIES DEPARTMENT WATER DIVISION : Docket No. 3818
APPLICATION TO CHANGE RATE SCHEDULES :

**MOTION OF THE PORTSMOUTH WATER
AND FIRE DISTRICT TO INTERVENE**

The Portsmouth Water and Fire District ("Portsmouth") hereby moves to intervene in this proceeding. In support of this motion, Portsmouth states that:

1. Portsmouth purchases all of the water that it supplies to customers within the Portsmouth Water and Fire District.
2. The City of Newport Utilities Department, Water Division ("Newport"), is the sole supplier of water to Portsmouth.
3. Portsmouth estimates that it will purchase approximately 455,000,000 gallons of water from Newport during its next fiscal year, which runs from May 1, 2007, to April 30, 2008.
4. Portsmouth purchased an average of 448,000,000 gallons of water from Newport during each of its previous five (5) fiscal years.

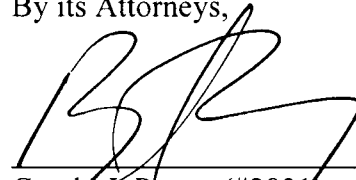
Portsmouth seeks to intervene in this proceeding pursuant to the Rhode Island Public Utility Commission's Rules of Practice and Procedure. Portsmouth possesses an interest that may be directly affected by the Commission's action in the proceeding and is not adequately represented by the existing parties. Portsmouth's participation in this proceeding is also clearly in the public interest.

The City of Newport has no objection to this motion to intervene.

Respectfully submitted,

PORTSMOUTH WATER AND FIRE
DISTRICT

By its Attorneys,

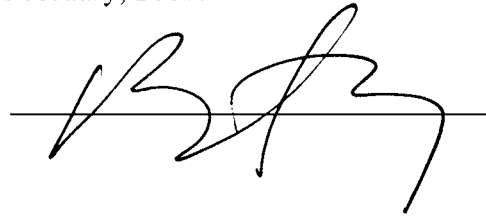


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401-274-2000
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Dated: February 22, 2007

CERTIFICATION

I hereby certify that I mailed a copy of the within Motion to Intervene to all parties set forth on the attached Service List on the 22 day of February, 2007.



SERVICE LIST - RIPUC DOCKET NO. 3818
City of Newport Water Division – General Rate Filing

Updated 2/22/07

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