

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: NEW ENGLAND GAS CO. :  
SERVICE QUALITY PROGRAM PROPOSAL : DOCKET NO. 3476

MOTION OF UNITED STEEL WORKERS OF AMERICA,  
LOCAL 12431, FOR LEAVE TO INTERVENE

Now comes the United Steel Workers of America, Local 12431 (“the movant”) and moves for leave to intervene in the above-referenced Docket.

In support of its motion, the Movant states that it is the labor union recognized pursuant to federal labor relations law to represent certain of the employees at the applicant company. As a result of any Commission action on the pending Docket, the rights and responsibilities of Movant and the Company pursuant to their collective bargaining agreement will be invariably affected. Accordingly, it is necessary for the Movant to be allowed to intervene to cross-examine witnesses and to present argument and testimony in support of its position.

WHEREFORE, United Steel Workers of America, Local 12431, respectfully requests leave to intervene in the above-referenced proceedings and to participate by filing testimony, participating in cross-examination and argument and in any other proceedings which may relate to this Docket.

Respectfully submitted,  
United Steel Workers of America, Local 12431  
By its Attorney,

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CERTIFICATION

I hereby certify that on this                    day of October, 2002, I forwarded a true copy of the  
within to the following:

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