

Energy Consumers Alliance of New England

doing business as



PEOPLE'S
Power & Light

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

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PUBLIC UTILITIES COMMISSION

In Re: Gas Energy Efficiency Programs for 2007, Docket No. 3790

Dear Luly,

Enclosed are an original and nine copies of a Motion to Intervene by The Energy Consumers Alliance of New England, doing business as People's Power & Light in Rhode Island.

If you have any questions, please call me at (401)497-5968.

Sincerely,

Karina Lutz
Director of Development and Advocacy

Larry Chretien, Executive Director
Omay Elphick, Deputy Director
Michele Bilodeau, Fiscal Director

**TO THE STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: Docket No. 3790, NATIONAL GRID CO. GAS ENERGY EFFICIENCY PROGRAMS FOR 2007

**MOTION TO INTERVENE
BY ENERGY CONSUMERS ALLIANCE OF NEW ENGLAND, dba PEOPLE'S POWER & LIGHT
FEBRUARY 28, 2007**

Energy Consumers Alliance of New England (PP&L), in its own name and on behalf of its members hereby moves to intervene in the above-entitled case, and in support of its motion states as follows:

- 1) Energy Consumers Alliance of New England is a nonprofit organization dedicated to making energy affordable and sustainable in Rhode Island and Massachusetts. It continues to do business as People's Power & Light in Rhode Island, the Rhode Island organization's name before we merged with Massachusetts Energy Consumers Alliance in July 2006.
- 2) Most of PP&L's members are residential ratepayers, with some small commercial and nonprofit organizations.
- 3) Our mission and members compel us to promote energy efficiency, renewable energy, and protections for low-income and other consumers to ensure energy affordability.
- 4) For that reason, we have been involved for several years in the collaborative overseeing National Grid's electricity DSM program, including signing the settlement agreement for Docket 3779 last December.
- 5) We would represent the public's interest in energy affordability and sustainability in proceedings, hopefully through the collaborative process, examining the new gas DSM program that National Grid proposed in Docket 3790 before the Commission.
- 6) PP&L would represent its members' and the public's interest in how the program would be implemented and compensated, to ensure the program is cost effective and fair, and properly serves our members and the public at large.
- 7) PP&L seeks intervenor status in order to participate in hearings and discussions regarding all matters pertaining to this docket.
- 8) All correspondence to PP&L regarding this docket should be addressed to:
Karina Lutz
Director of Development and Advocacy
People's Power & Light
17 Gordon Ave.
Providence, RI 02905
(401)497-5968
voice mail: (401)861-6111 x151
fax: (401)861-6115
karina@ripower.org
- 9) PP&L agrees to be bound by the previously established procedural schedule.
- 10) PP&L would retain counsel for any intervention before the Commission.

WHEREFORE, PP&L respectfully requests that this motion to intervene be granted.

Respectfully submitted,



Karina Lutz
Energy Consumers Alliance of New England