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January 26, 2009

BY FEDERAL EXPRESS

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

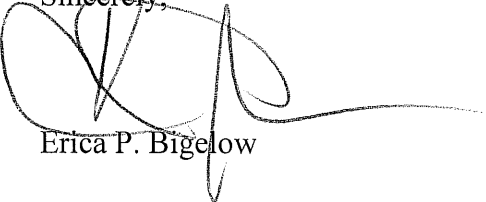
Re: Issuance of Advisory Opinion to the Energy Facility Siting Board
Regarding Narragansett Electric Co. d/b/a National Grid's Application to
Construct and Alter Transmission Lines and Facilities – Docket No. 4029

Dear Ms. Massaro:

Enclosed for filing in the above-captioned matter please find ISO New England's ("ISO") Motion to Intervene.

Please call me if there are any questions.

Sincerely,



Erica P. Bigelow

Enclosure

cc: Cynthia Wilson-Frias, Esq.,
Kevin Flynn, Esq. (via e-mail)
Service List (Dkt. 4029)

**STATE OF RHODE ISLAND AND
PROVIDENCE PLANTATIONS**

PUBLIC UTILITIES COMMISSION

DOCKET No. 4029

**In re: Issuance of Advisory Opinion to the Energy
Facility Siting Board Regarding Narragansett
Electric Company d/b/a National Grid's Application
to Construct and Alter Major Energy Facilities**

**MOTION TO INTERVENE OF
ISO NEW ENGLAND INC.**

Pursuant to Section 1.13 of the Commission's Rules of Practice and Procedure, ISO New England Inc. (the "ISO") hereby requests the Public Utilities Commission ("PUC") for leave to intervene as a party in the above proceedings, stating in support thereof the following:

1. The ISO is the private, independent, non-profit Regional Transmission Organization for New England, located at One Sullivan Road, Holyoke, Massachusetts. Pursuant to the agreements and tariffs on file with the Federal Energy Regulatory Commission, the ISO administers the regional open access transmission tariff for New England, administers the New England product markets, and operates the New England bulk power system (the "System"). The ISO also has the responsibility to protect the short-term reliability of the control area and to administer competitive and efficient wholesale markets.

2. The PUC opened this docket to, among other things, provide an advisory opinion to the Rhode Island Energy Facilities Siting Board (pursuant to the December 19, 2008 Notice of Designation to an Agency to Render an Advisory Opinion) regarding the proposal of Narragansett Electric Company ("Narragansett" or the "Company") to relocate and construct two existing 115 kV transmission lines, construct a new 345 kV transmission line, install equipment, reconductor existing transmission lines and relocate short segments of existing transmission lines to accommodate equipment additions in the municipalities of Cranston, Johnston, North Smithfield, Smithfield, Warwick and West Warwick (the "Project").

3. Pursuant to the Notice of Public Hearing, setting forth a procedural schedule, dated January 23, 2009, the ISO requests that it be permitted to intervene as a party at this time in order to adequately represent and protect its interests in this proceeding. The ISO is substantially and specifically affected by this proceeding, because it is responsible for the provision of transmission service and for regional system planning through the open access transmission tariff for New England, which includes the State of Rhode Island. The Application under review concerns construction of new transmission capacity and upgrading of existing transmission facilities, as referenced in paragraph 2 above, and in its Application, Narragansett asserts that the Project will improve the reliability and stability of the electrical transmission system in Rhode Island. Because such transmission system enhancements are central to the function of the ISO and because no other party shares such responsibility, the ISO is specifically affected and no other party can adequately represent the ISO's interests in this regard.

4. This proceeding affects the ISO's interests as described above, and the ISO's interest in this matter cannot be adequately addressed or represented by any other party. Further, the ISO's participation in this proceeding as a party may help ensure the development of a comprehensive record, while affording the ISO the opportunity to maximize its ability to fulfill its obligations as noted above.

5. If granted leave to intervene, the ISO's intention currently is to participate in this proceeding primarily by presentation of testimony or other relevant evidence, or issuing or responding to discovery and by filing briefs and comments, as may be appropriate. If granted leave to intervene, the ISO requests that copies of all materials filed in this docket be served on the ISO as specified in paragraph 6 below.

6. All communications and correspondence for this proceeding should be directed to the undersigned and to:

Eric Krathwohl, Esq./Erica Bigelow, Esq.,
Rich May, PC
176 Federal Street, 6th Floor
Boston, MA 02110-2223
(617) 556-3857 (Telephone)
(617) 556-3890 (Fax)
e-mail: ekrathwohl@richmaylaw.com
ebigelow@richmaylaw.com

and

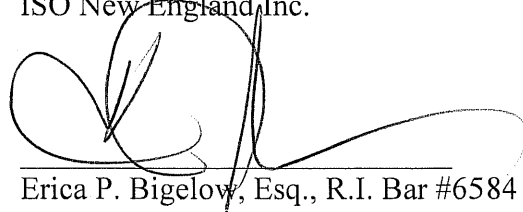
Kevin Flynn, Esq.
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841
kflynn@iso-ne.com
T (413) 535-4177
F (413) 535-4379

WHEREFORE, ISO New England Inc. requests that it be permitted to intervene in these proceedings as a party.

Respectfully submitted,

ISO New England Inc.

By:



Erica P. Bigelow, Esq., R.I. Bar #6584
Eric Krathwohl, Esq.
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Date: January 26, 2009

**STATE OF RHODE ISLAND
AND PROVIDENCE PLANTATIONS**

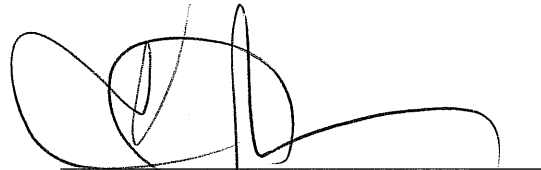
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of Section 1.7 (d) of the Public Utilities Commission's Rules of Practice and Procedure.

Dated at Boston, Massachusetts this 26th day of January, 2009.

A handwritten signature in black ink, appearing to read 'Erica P. Bigelow', written over a horizontal line.

Erica P. Bigelow
Counsel

Of Counsel for
ISO New England, Inc.