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August 2, 2012

Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

***In Re: Commission Investigation Relating to Stray and Contact Voltage Occurring in
Narragansett Electric Company Territories Docket 4237***

Dear Ms. Massaro:

Enclosed please find an original and ten (10) copies of the following documents:

1. Capital Advocacy, LLC d/b/a Contact Voltage Information Center's Motion to File Out of Time;
2. Capital Advocacy, LLC d/b/a Contact Voltage Information Center's Motion to Intervene.

Please note that an electronic copy of these documents has been sent to the service list.

Sincerely,



Joseph A. Keough Jr.

JAK/kf
Enclosures
cc: Service List (via electronic mail)

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

IN RE: COMMISSION INVESTIGATION :
RELATING TO STRAY AND CONTACT VOLTAGE : **DOCKET No. 4237**
OCCURRING IN NARRAGANSETT ELECTRIC :
COMPANY TERRITORIES :

**CAPITAL ADVOCACY, LLC, D/B/A CONTACT VOLTAGE INFORMATION CENTER'S
MOTION TO FILE OUT OF TIME**

NOW COMES Capital Advocacy, LLC d/b/a Contact Voltage Information Center (“CVIC”), and moves that the Rhode Island Public Utilities Commission (“Commission”) allow CVIC to file a Motion To Intervene after the deadline set in the Procedural Schedule in this docket. In support thereof, CVIC states as follows:

1. Capital Advocacy, LLC d/b/a Contact Voltage Information Center (“CVIC”) is a Rhode Island Limited Liability Corporation.
2. CVIC is a public service organization dedicated to raising public awareness of issues related to contact voltage.
3. CVIC is an advocate for the implementation of legislation and regulations for utility company detection programs related to contact voltage.
4. CVIC maintains a website that provides information and resources regarding contact voltage issues (www.contactvoltageinfo.org).
5. Rosalind Rustigan, the Executive Director of CVIC, is a resident of Providence, Rhode Island and is a customer of National Grid.
6. Rosalind Rustigan, the Executive Director of CVIC, testified before the Rhode Island State Legislature regarding the enactment of legislation related to contact voltage.

7. On June 6, 2012, the Rhode Island General Assembly enacted legislation regarding "Contact Voltage, Detection, Repair and Reporting." (See RIGL §39-2-25).
8. R.I.G.L. §39-2-25 directed the Commission and the Rhode Island Division of Public Utilities and Carriers to initiate a proceeding regarding a contact voltage detection and repair program.
9. The Commission initiated this proceeding as a new part of the existing Docket 4237.
10. On June 18, 2012, the Commission established a procedural schedule for this docket.
11. This procedural schedule set a deadline of July 9, 2012 for Motions to Intervene.
12. CVIC was not a party to Docket 4237 and was not included on the service list for said docket.
13. As a result, CVIC did not receive notice of the deadline for filing Motions to Intervene.
14. On July 31, 2012, CVIC submitted a letter request to intervene in Docket 4237. (Exhibit 1).
15. The Commission informed CVIC that a formal motion would have to be filed by a licensed attorney. (Exhibit 2).
16. As such, CVIC requests that it be allowed to file a motion to intervene as a party in Docket 4237 after the deadline set in the Commission's procedural schedule.
17. CVIC has a significant interest that may be directly affected by the Commission's review and decision in this matter.

18. This interest is not adequately represented or protected by the existing parties in this docket, and CVIC may be bound by the Commission's action in this docket.

19. In addition, CVIC's participation in this docket is in the public interest.

20. CVIC's out of time filing of its Motion to Intervene will not prejudice any of the parties to this docket.

WHEREFORE, Capital Advocacy, LLC, d/b/a Contact Voltage Information Center, requests that the Commission grant its request to file its Motion To Intervene after the deadline established in the Commission's Procedural Schedule, and that the Commission grant all other relief it deems meet and just.

CAPITAL ADVOCACY, LLC, D/B/A
CONTACT VOLTAGE INFORMATION CENTER,
By its attorney,



Joseph A. Keough, Jr. (#4925)

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jkeoughjr@keoughsweeney.com

Dated: August 2, 2012

EXHIBIT 1

July 31, 2012

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

RE: Docket No. 4237 Regarding Contact Voltage Legislation and Mandates

Dear Ms. Massaro:

My name is Roz Rustigian and I am the executive director of CVIC (Contact Voltage Information Center). CVIC is a public service organization dedicated to raising public awareness of the dangers of contact voltage. It also is an advocate for the implementation of legislation and regulations relative to utility company detection programs to remedy this potential public danger. We are supported by the Jodie Lane Foundation, Deanna Lyric Foundation and numerous other organizations including a host of animal rights groups and veterinary medical associations.

This letter represents my formal request to the PUC to allow CVIC to intervene in the hearings related to the newly mandated Contact Voltage program as outline in legislation enacted in June of this year.

We have had discussions with the administrative head of the Division of Utilities and this department has no objection to our desire to intervene in this matter of public safety.

I thank you for your time and consideration.

Regards,

Roz Rustigian
Contact Voltage Information Center
c/o One Governor Street
Providence, RI 02906

cc: Wallace Gernt

EXHIBIT 2



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION
89 Jefferson Blvd.
Warwick RI 02888
(401) 941-4500

Chairman Elia Germani
Commissioner Mary E. Bray
Commissioner Paul J. Roberti

July 31, 2012
Via Electronic Mail

Roz Rustigian
Contact Voltage Information Center
c/o One Governor Street
Providence, RI 02906

Re: Your Letter Regarding Docket No. 4237 Contact Voltage Legislation and Mandates

Dear Ms. Rustigian:

The Public Utilities Commission ("Commission") is in receipt of your letter dated today regarding your request to allow CVIC to intervene in the hearings in Docket No. 4237. Before the Commission can consider the substance of such a request, because it is on behalf of an organization, it needs to be filed by an attorney licensed to practice law in Rhode Island. This requirement can be found in the Commission Rules of Practice and Procedure 1.4, referencing the appropriate Rhode Island law. A quick search of the Rhode Island Bar Association website does not show you as being an attorney in Rhode Island. However, if you are, please simply provide your RI Bar number for our reference.

You are, of course, invited to provide public comment at the beginning of the hearing on September 24, 2012 without the need to file any formal request with the Commission. The Commission allows public comment by any member of the public or representative of an organization at the start of each public hearing. You may also follow the actions in the docket on the Commission's website, including viewing a copy of filings made with the Commission at: <http://www.ripuc.org/eventsactions/docket/4237page.html>

Please feel free to contact me with any questions at 401-780-2147.

Sincerely,

Cynthia G. Wilson-Frias
Senior Legal Counsel

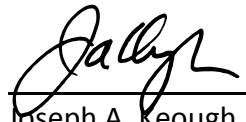
Cc: Docket No. 4237 Service List
Wally Gernt

CERTIFICATION

I hereby certify that on August 2, 2012, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

Name	E-mail Distribution List	Phone	
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	Joanne.scanlon@us.ngrid.com		
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	nucci@puc.state.ri.us		

Christopher Kearns, Governor's Policy Office	Christopher.Kearns@governor.ri.gov	
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COMPANY TERRITORIES :

**CAPITAL ADVOCACY, LLC, D/B/A CONTACT VOLTAGE INFORMATION CENTER'S
MOTION TO INTERVENE**

NOW COMES Capital Advocacy, LLC d/b/a Contact Voltage Information Center (“CVIC”), and pursuant to Rule 1.13 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission (“Commission”), moves that the Commission grant CVIC the right to intervene as a party in the above-captioned docket for the reasons set forth herein:

1. Capital Advocacy, LLC d/b/a Contact Voltage Information Center (“CVIC”) is a Rhode Island Limited Liability Corporation.
2. CVIC is a public service organization dedicated to raising public awareness of issues related to contact voltage.
3. CVIC is an advocate for the implementation of legislation and regulations for utility company detection programs related to contact voltage.
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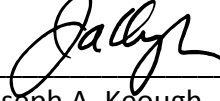
10. CVIC has a significant interest that may be directly affected by the Commission's review and decision in this matter.

11. This interest is not adequately represented or protected by the existing parties in this docket, and CVIC may be bound by the Commission's action in this docket.

12. In addition, CVIC's participation in this Docket is in the public interest.

WHEREFORE, Capital Advocacy, LLC, d/b/a Contact Voltage Information Center, requests that the Commission grant its Motion to Intervene and that it be granted status as a party in this proceeding, and that the Commission grant all other relief it deems meet and just.

CAPITAL ADVOCACY, LLC, D/B/A
CONTACT VOLTAGE INFORMATION CENTER,
By its attorney,



Joseph A. Keough, Jr. (#4925)

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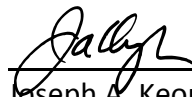
Dated: August 2, 2012

CERTIFICATION

I hereby certify that on August 2, 2012, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

Name	E-mail Distribution List	Phone	
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	Jallaire@pud-ri.org		
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Michael McElroy, Esq. 21 Dryden Lane PO Box 6721 Providence, RI 02940-6721	Michael@McElroyLawOffice.com	401-351-4100	
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