

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF PUBLIC UTILITIES AND CARRIERS

APPLICATION OF THE NARRAGANSETT )  
ELECTRIC COMPANY D/B/A/ NATIONAL GRID ) Dkt. No 4323  
FOR APPROVAL OF A CHANGE IN ELECTRIC )  
AND GAS BASE DISTRIBUTIONS RATES )

MOTION TO INTERVENE OF PETER F. KILMARTIN  
ATTORNEY GENERAL

Pursuant to Rule 17, of the Rules of Practice and Procedure of the Division of Public Public Utilities and Carriers (“Division”) and Rule 1.13 of the Rules of Practice and Procedure of the Public Utility Commission (“Commission”), Peter F. Kilmartin, Attorney General of the State of Rhode Island, hereby moves to intervene with full-party status in the above-captioned proceeding, and in support of its motion, states as follows:

Introduction

Commission Rule of Practice and Procedure 1.13(b) specifically, dictates who may intervene in Commission proceedings.

Rule 1.13(b) states, in pertinent part, that “any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission...”

Attorney General’s interest in this proceeding

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Under common law, the Attorney General is the representative of the public, empowered to bring actions to redress grievances suffered by the public as a whole. Moreover, the Attorney General on a number of previous occasions has been granted full-party status in related Division and Commission proceedings.

The Attorney General has a strong interest in evaluating the necessity and appropriateness of a request for an increase in rates. Further, in light of the State of Rhode Island's current economic environment, the Attorney General contends that his attention and active participation in this proceeding is indisputably warranted, and essential to serving and protecting the public interest.

The Attorney General submits that his involvement will be helpful in determining whether the approval of the proposed application for a "Change in Electric and Gas Base Distribution Rates", in its entirety or in part, is consistent with the public interest. Thus, the Attorney General's intervention is necessary and appropriate under Rule 1.13(b) of the Rules of Practice and Procedure of the Commission.

#### Conclusion

WHEREFORE, for the reasons set forth herein, the Attorney General respectfully requests that the Commission grant his motion to intervene in this proceeding, with all rights associated therewith.

PETER F. KILMARTIN  
ATTORNEY GENERAL  
By his attorney,

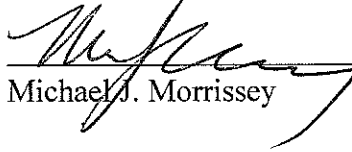


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Michael J. Morrissey #8548  
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Providence, Rhode Island 02903  
401-274-4400, ext. 2357

CERTIFICATE OF SERVICE

I hereby certify that on this 5<sup>th</sup> day of June, 2012 a copy of the preceding motion was served by first class mail, postage prepaid, upon the individuals listed below:

  
Michael J. Morrissey

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File original & 9 copies with: Public Utilities Commission	89 Jefferson Blvd.	Warwick, RI 02888