



101 Tremont Street  
Suite 401  
Boston, MA 02108  
(617) 742-0054  
[www.env-ne.org](http://www.env-ne.org)

Rockport, ME  
Portland, ME  
Boston, MA  
Providence, RI  
Hartford, CT  
Charlottetown, PE  
Canada

*Via First Class Mail and E-mail*

December 15, 2011

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utility Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**Re: Docket 4296: National Grid 2012 System Reliability Procurement Plan**

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter, please find the Motion to Intervene of Environment Northeast ("ENE") and associated Appearances of Counsel (one original and 10 copies).

Kindly date stamp the enclosed extra copy and return it in the enclosed self-addressed stamped envelope. If you have any questions or concerns, please do not hesitate to contact me at 617-742-0054 x102.

Sincerely,

*/s/ Jeremy C. McDiarmid*

Jeremy C. McDiarmid  
Staff Attorney

Enclosures

cc: Amy K. D'Alessandro, Esq., Public Utilities Commission  
Jennifer Brooks Hutchinson, Esq., National Grid  
Seth H. Handy, Esq., Chace Ruttenberg & Freedman, LLP  
Service List (via e-mail)

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

---

IN RE: NATIONAL GRID REVENUE  
2012 SYSTEM RELIABILITY  
PROCUREMENT PLAN

---

)  
)  
)  
)  
)

Docket No. 4296

**MOTION TO INTERVENE OF ENVIRONMENT NORTHEAST**

By its attorney, Environment Northeast (“ENE”), hereby moves pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure (“Rules”) to intervene in the above-captioned proceeding and, in support of its motion, states:

1. ENE is a non-profit organization which researches and addresses environmental problems that threaten regional ecosystems, human health and the management of natural resources.
2. Rule 1.13(b) of the Commission Rules of Practice and Procedure states “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.”
3. Further, Rule 1.13(b)(2) goes on to state that such a right or interest may be “an interest which may be directly affected and which is not adequately represented by existing parties.”
4. R.I.G.L. § 39-1-27.7 provides a unique opportunity for Rhode Island to identify and procure cost-effective customer-side and distributed resources with a focus on alternative solutions to the traditional supply options. Over time these alternative solutions may deliver savings to customers by deferring or avoiding distribution system investments and improving overall system reliability and efficiency.

5. On November 2, 2011, National Grid (the “Company”) filed the 2012 System Reliability Procurement Plan (SRPP) pursuant to R.I.G.L. §39-1-27.7 and the revised System Reliability Procurement Standards (“Standards”) that were approved by the Commission in Docket 4202. The Company’s SRPP integrates the analysis of non-wires alternatives (“NWAs”) into the Company’s distribution planning functions by using analytical tools to evaluate the costs and benefits of traditional and NWA solutions to identify system needs for which NWAs are preferred solutions.
6. In their filing, the Company proposes the use of NWAs to provide 1 MW of load reduction, which will allow deferral of a new substation feeder for a four year period.
7. ENE has been active in Rhode Island and other New England states in researching and promoting energy efficiency and other demand side resources to mitigate environmental harm and reduce costs for energy consumers.
8. ENE has considerable experience and expertise in matters relating to Rhode Island energy policy. ENE has a staff member who has been appointed to the RI Energy Efficiency and Resources Management Council (EERMC) and is an active participant in the collaborative planning process for Rhode Island electric and natural gas efficiency programs. Through its role on the EERMC, ENE had an active role developing the System Reliability Standards approved by the Commission in Docket 4202 and participated in the development of the 2012 SRPP.
9. ENE has a staff member who is an appointed member of the Energy Conservation Management Board which reviews the planning and implementation of gas and electric utility energy efficiency programs for the State of Connecticut, and also has a staff member who has been appointed to Massachusetts’s Energy Efficiency Advisory Council.

10. ENE has participated in public utility dockets related to NWAs, including Maine Public Utility Commission Docket No. 2008-255, the Maine Power Reliability Program, and is currently participating in a Maine study committee formed to explore the use of NWAs in transmission and distribution planning.
11. ENE's interests are directly affected by the issues in this proceeding and cannot be adequately represented by any other party. To mitigate environmental harm and reduce costs for energy consumers, ENE spends considerable time, effort, and monetary resources working to ensure that all cost-effective energy efficiency and system reliability resources are procured in Rhode Island and that all cost-effective energy efficiency resources are procured in Massachusetts, Connecticut, and Maine.
12. Rule 1.13(b)(3) states that such a right or interest to intervene may be "any other interest of such nature that movant's participation may be in the public interest." ENE has been a key contributor to the development of the System Reliability Procurement Standards and the 2012 SRPP. ENE's staff has a combined several decades of experience on the impact of energy efficiency on the region's energy system and has the capacity and organizational commitment to ensure energy efficiency and system reliability procurements in Rhode Island maximize environmental, climate, public health, and consumer benefits. As such, ENE's participation in this proceeding is in the public interest.
13. In an October 19, 2010 Order in Supreme Court Case No. 10-356-M.P., ENE attorney Jeremy C. McDiarmid has been admitted *pro hac vice* to "represent Environment Northeast in proceedings before the Public Utilities Commission in Docket 4296 and subsequent related dockets."
14. Accordingly, ENE's intervention is necessary and appropriate under Rule 1.13(b)(2) and Rule 1.13(b)(3) of the Rules.

Service of any correspondence or pleadings in connection with these matters should be directed to:

Jeremy C. McDiarmid  
Environment Northeast  
101 Tremont Street, Suite 401  
Boston, MA 02108  
617-742-0054  
[jmcdiarmid@env-ne.org](mailto:jmcdiarmid@env-ne.org)

and

Seth H. Handy  
Handy Law, LLC  
42 Weybosset Street  
Providence RI 02903  
(401) 626-4839  
[seth@handylawllc.com](mailto:seth@handylawllc.com)

WHEREFORE, based on the foregoing reasons, ENE asks that the Commission grant its Motion to Intervene.

Respectfully submitted,

ENVIRONMENT NORTHEAST

By its attorneys,

*/s/ Jeremy C. McDiarmid*

---

Jeremy C. McDiarmid  
ENVIRONMENT NORTHEAST  
101 Tremont Street, Suite 401  
Boston, MA 02108  
617-742-0054  
[jmcdiarmid@env-ne.org](mailto:jmcdiarmid@env-ne.org)

Seth H. Handy (RI # 5554)  
HANDY LAW, LLC  
42 Weybosset Street  
Providence RI 02903  
(401) 626-4839  
[seth@handylawllc.com](mailto:seth@handylawllc.com)

Dated: December 15, 2011

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

---

IN RE: NATIONAL GRID REVENUE  
2012 SYSTEM RELIABILITY  
PROCUREMENT PLAN

---

)  
)  
)  
)  
)

Docket No. 4296

**NOTICE OF APPEARANCE OF COUNSEL**

Pursuant to Rule 1.4 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, please enter my appearance on behalf of Environment Northeast, in the above-captioned proceeding.

Respectfully submitted,

*/s/ Seth H. Handy*

---

Seth H. Handy (RI # 5554)  
HANDY LAW, LLC  
42 Weybosset Street  
Providence RI 02903  
(401) 626-4839  
[seth@handylawllc.com](mailto:seth@handylawllc.com)

Dated: December 15, 2011

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

---

IN RE: NATIONAL GRID REVENUE  
2012 SYSTEM RELIABILITY  
PROCUREMENT PLAN

---

)  
)  
)  
)  
)

Docket No. 4296

**NOTICE OF APPEARANCE OF COUNSEL**

Pursuant to Rule 1.4 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, please enter my appearance on behalf of Environment Northeast, in the above-captioned proceeding.

Respectfully submitted,

*/s/ Jeremy C. McDiarmid*

---

Jeremy McDiarmid  
ENVIRONMENT NORTHEAST  
101 Tremont Street, Suite 401  
Boston, MA 02108  
617-742-0054  
[jmcdiarmid@env-ne.org](mailto:jmcdiarmid@env-ne.org)

Dated: December 15, 2011

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2011, I delivered a true copy of the foregoing documents either by first class mail or by electronic mail to the Docket 4296 Service List as of December 15, 2011.

*/s/ Jeremy C. McDiarmid*

---

Jeremy C. McDiarmid