



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Administration
DIVISION OF LEGAL SERVICES
One Capitol Hill, 4th Floor
Providence, RI 02908-5890

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November 12, 2014

SENT VIA FIRST CLASS MAIL AND ELECTRONIC MAIL:

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

RE: National Grid 2015 Energy Efficiency Procurement Plan Docket No. 4527 and
National Grid 2015 System Reliability Procurement Plan Docket No. 4528
("Motion to Intervene")

Dear Ms. Massaro:

Please see attached Motion to Intervene and Entry of Appearance (an original plus ten (10) copies) pertaining to the above mentioned matter.

Sincerely,

Daniel W. Majcher, Esq.

DWM/njr

Enclosure

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID 2015 ENERGY EFFICIENCY PROCUREMENT PLAN
DOCKET NO. 4527 AND NATIONAL GRID 2015 SYSTEM RELIABILITY
PROCUREMENT PLAN DOCKET NO. 4528

MOTION TO INTERVENE
BY THE RHODE ISLAND OFFICE OF ENERGY RESOURCES

By its attorney, the Rhode Island Office of Energy Resources (“OER”), hereby moves to intervene in the above-captioned proceeding pursuant to Rule 1.13 (a) and (b) of the Rhode Island Public Utilities Commission (“PUC”) Rules of Practice and Procedure (“Rules”). In support of this motion, OER provides:

1. The OER is the Rhode Island State agency responsible for implementing and overseeing the State's energy policies and programs. The OER was created by the General Assembly in 2006 for the purposes stated in R.I. Gen. Laws § 42-140-3. Among those purposes are:
 - (3) Develop and to put into effect plans and programs to promote, encourage and assist the efficient and productive use of energy resources in Rhode Island, and to coordinate energy programs for natural gas, electricity, and heating oil to maximize the aggregate benefits of conservation and efficiency of investments;
 - (6) Develop, recommend and, as appropriate, implement integrated and/or comprehensive strategies, including at regional and federal levels, to secure Rhode Island's interest in energy resources, their supply and efficient use, and as necessary to interact with persons, private sector, non-profit, regional, federal entities and departments and agencies of other states to effectuate this purpose;
 - (9) Coordinate the energy efficiency, renewable energy, least cost procurement, and systems reliability plans and programs with the energy efficiency resource management council and the renewable energy coordinating board;

Therefore, it is necessary and appropriate to grant OER’s motion to intervene because OER has an interest that is directly affected by this proceeding.

2. Rule 1.13 allows for any person claiming an interest of such nature that intervention is necessary or appropriate to submit a motion to intervene in any proceeding before the PUC.
3. Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.

WHEREFORE, based on the reasons stated herein, the Office of Energy Resources (“OER”) respectfully requests that the Rhode Island Public Utilities Commission grant this motion and allow the OER to intervene.

Please direct service of any correspondence or pleadings in connection with this proceeding to:

Chris Kearns
Chief, Program Development
Rhode Island Office of Energy Resources
One Capitol Hill, 4th Floor
Providence, R.I., 02908
P:401.574.9113
F:401.574.9125
Christopher.kearns@energy.ri.gov

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daniel.majcher@doa.ri.gov

Respectfully Submitted,
The OFFICE OF ENERGY RESOURCES,

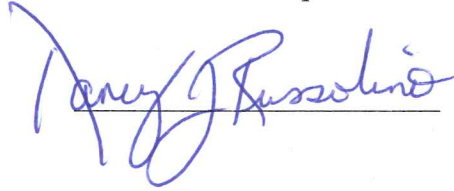
By their Attorney,



Daniel W. Majcher, Esq. (#7265)
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CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2014, I mailed this original pleading and 9 copies to the PUC and sent a true copy of the document by electronic mail to the parties listed in the respective dockets.

A handwritten signature in blue ink, reading "Nancy J. Russolino", is written over a horizontal line. The signature is cursive and includes a small mark above the 'i' in "Russolino".

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID 2015 ENERGY
EFFICIENCY PROCUREMENT PLAN AND
NATIONAL GRID 2015 SYSTEM RELIABILITY
PROCUREMENT PLAN

DOCKET NO. 4527
and
DOCKET NO. 4528

Entry of Appearance

On behalf of the Rhode Island Office of Energy Resources', I, Daniel W. Majcher, Esq., hereby enter my appearance for the above mentioned docket.

Respectfully Submitted,



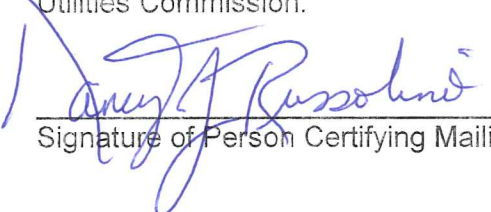
Daniel W. Majcher, Esq. (Bar ID #7265)
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FAX: (401) 222-8244
EMAIL: daniel.majcher@doa.ri.gov

11/12/14

Date

CERTIFICATE OF MAILING

I hereby certify that on the 12th day of November, 20 14, I mailed a true copy of this Entry of Appearance by regular mail, postage prepaid to the Rhode Island Public Utilities Commission.



Signature of Person Certifying Mailing