

# Schacht & McElroy

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March 26, 2015

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

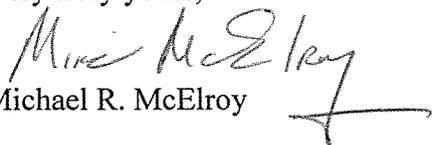
In Re: 2016 Standard Offer Service Procurement Plan and 2016 Renewable Energy  
Standard Procurement Plan – Docket No. 4556

Dear Luly:

Enclosed for filing are an original and 10 copies of Lieutenant Governor Daniel J. McKee's Motion to Intervene in this matter.

If you have any questions, please feel free to call.

Very truly yours,

  
Michael R. McElroy

MRMc:tmg  
cc: Service List

*McKee/Docket No. 4556/Motion to Intervene*

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: 2016 STANDARD OFFER SERVICE :  
PROCUREMENT PLAN AND : DOCKET No.: 4556  
2016 RENEWABLE ENERGY :  
STANDARD PROCUREMENT PLAN :

**MOTION TO INTERVENE OF LIEUTENANT GOVERNOR DANIEL J. McKEE**

Now comes Daniel J. McKee (McKee), by his undersigned counsel, and pursuant to Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission (Commission) hereby moves to intervene as a full party in this matter.

1. McKee is the Lieutenant Governor of the State of Rhode Island.
2. As the Lieutenant Governor, McKee serves as the Chairperson of the Small Business Advisory Council pursuant to R.I.G.L. § 42-91-2(a).
3. As set forth in R.I.G.L. § 42-91-3(a): “The purpose of the council shall be to develop those specific and comprehensive recommendations for executive and legislative action as may be necessary and proper to maintain and encourage the continued viability of small businesses in the state.”
4. Small businesses are the backbone of the Rhode Island economy. According to the Small Business Profile for Rhode Island published in February of 2013 by the United States Small Business Administration, Office of Advocacy:  
  
“Small businesses significantly impact Rhode Island’s economy. They represent 95.9 percent of all employers and employ 55.4 percent of the private-sector labor force. Small businesses are crucial to the fiscal condition of the state and numbered 95,471 in 2010.”
5. Unfortunately, however, small businesses are historically under-represented in matters such as the pending rate case. The interests of residential ratepayers are vigorously

represented by the Division of Public Utilities and Carriers (Division) and the Attorney General. The industrial and large commercial ratepayers in Rhode Island are often represented by The Energy Council of Rhode Island (TEC-RI). However, we are unaware of any specific representation of the interests of small businesses in ratemaking matters.

6. McKee, acting in his capacities as the Lieutenant Governor and the Chairperson of the Small Business Advisory Council, respectfully moves to intervene as a full party in this docket.

7. McKee’s intervention will primarily advocate for the elimination at the earliest opportunity of National Grid’s one-time billing adjustment for residential and commercial customers that switch from standard offer service to a non-regulated power provider in order to encourage the full development of competition in Rhode Island.

8. McKee intends to file supporting testimony in this docket from John Farley, a utility ratemaking expert, who is the former Executive Director of TEC-RI.

9. Commission Rule 1.13 provides 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.” The Rule goes on to further state that such a right or an interest may be:

“an interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission’s action in the proceeding. (The following may have such an interest: consumers served by the applicant . . .).”

10. Rule 1.13 also provides that such right or interest may be “any other interest of such nature that movant’s participation may be in the public interest.”

11. McKee agrees to be bound by the procedural schedule already established in this docket.

WHEREFORE, Lieutenant Governor Daniel J. McKee, pursuant to Rule 1.13, respectfully moves for intervention as a full party in this matter.

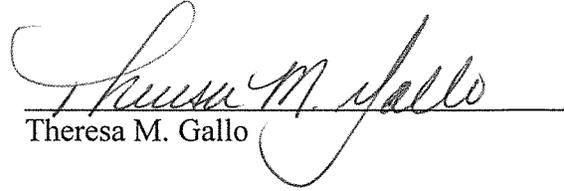
Respectfully submitted,  
Lieutenant Governor Daniel J. McKee  
By his attorney

Date: March 26, 2015

  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 26<sup>th</sup> day of March, 2015, I sent a true copy of the foregoing to the attached service list.

  
Theresa M. Gallo

*McKee/Docket No. 4556/Motion to Intervene*

Docket No. 4556 - National Grid – 2016 Standard Offer Service (SOS) and  
Renewable Energy Standard (RES) Procurement Plans  
Service List updated 3/17/15

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	<a href="mailto:James.Ruebenacker@nationalgrid.com">James.Ruebenacker@nationalgrid.com</a>	
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	<a href="mailto:mneal@lacapra.com">mneal@lacapra.com</a>	
<b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a>	401-780-2017
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