

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: NATIONAL GRID RATE DESIGN)
PURSUANT TO RIGL § 39-26.6-24)
_____)

DOCKET NO. 4568

UNOPPOSED MOTION TO INTERVENE OF ACADIA CENTER

By its attorney, Acadia Center 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. Acadia Center is a non-profit organization which helps to build clean, competitive, environmentally sustainable economies through data-driven research, innovative policies, and market-based solutions.
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. On July 1, 2015, pursuant to R.I. Gen. Laws § 39-26.6-24, a docket was opened to consider National Grid (the "Company") rate design and distribution cost allocation among rate classes in light of net metering and the changing distribution system that is expected to include more distributed energy resources, including, but not limited to, distributed generation.

5. On July 9, 2015, National Grid filed an executive summary of its proposed rate design together with its primary rationale for same.
6. Pursuant to Rule 1.15(b) of the Commission Rules of Practice and Procedure, Acadia Center contacted National Grid, the Division of Public Utilities and Carriers, the Office of Energy Resources, and CLF, all currently parties in Docket No. 4568, to determine whether any of these entities has an objection to Acadia Center's intervention in this Docket. All parties replied that they have no objection to Acadia Center's intervention.
7. Acadia Center has been active in Rhode Island and other northeastern states in researching and promoting consumer-friendly rate design that preserves incentives to use energy wisely and gives consumers greater control over energy bills.
8. Acadia Center has considerable experience and expertise in matters relating to Rhode Island energy policy, as well as the close relationship between electric rate design and energy efficiency and distributed generation adoption. Acadia Center has a staff person representing environmental issues pertaining to energy on the Rhode Island Energy Efficiency and Resource Management Council and is an active participant in the Collaborative planning process for Rhode Island's electric and natural gas energy efficiency programs.
9. Acadia Center has participated in public utility dockets relating to electric rate design in light of net metering and distributed generation in Connecticut, including Public Utility Regulatory Authority Docket No. 14-05-06. Acadia Center's analysis of utility rate design proposals has helped to shape Connecticut policies that affect ratepayers.
10. Acadia Center experts have researched and written about utility rate design in a distributed energy future, including its 2015 resource, "UtilityVision,¹" and "Utility Rate Design Principles

¹ See: <http://acadiacenter.org/utilityvision/>

for Advancing a Consumer-Friendly Energy System.²” This expertise will be of considerable benefit to the Commission in this docket.

11. Acadia Center’s interests are directly affected by the issues in this proceeding and cannot be adequately represented by any other party. To build environmentally-friendly and consumer-friendly energy systems, Acadia Center spends considerable time, effort, and monetary resources working to ensure that utility rate design preserves incentives to use energy wisely in Rhode Island, Massachusetts, Maine, Connecticut, and New York.
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.” Acadia Center’s staff has a combined several decades of experience on the impact of utility rate design on consumer adoption of energy efficiency and clean energy technologies, and the ability of consumers to control their energy bills. Acadia Center has the capacity and organizational commitment to ensure close relationship between decoupling and energy efficiency program delivery and has the capacity and organizational commitment to advance rate design in Rhode Island that will further a clean environment and consumer benefits. As such, Acadia Center’s participation in this proceeding is in the public interest.
13. In a July 20, 2015 Order in Supreme Court Case No. 15-224-M.P., Acadia Center attorney Mark E. LeBel has been admitted *pro hac vice* to “represent Acadia Center in the above-captioned proceeding [Docket No. 4568] before the Public Utilities Commission.”
14. Accordingly, Acadia Center’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:

² See: <http://acadiacenter.org/document/utility-rate-design-principles/>

Mark E. LeBel
Acadia Center
31 Milk Street Suite 501
Boston, MA 02108
617-742-0054 x.104
mlebel@acadiacenter.org

and

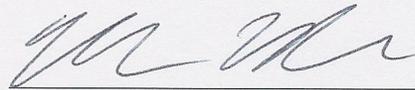
Quentin Anthony, Attorney at Law
41 Long Wharf Mall
Newport, RI 02840
Tel. 401.847.1008
E-mail qanthony@verizon.net

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

Respectfully submitted,

ACADIA CENTER

By its attorneys,



Mark E. LeBel
ACADIA CENTER
31 Milk Street, Suite 501
Boston, MA 02108
617-742-0054
mlebel@acadiacenter.org

Quentin Anthony (RI # 1939)
41 Long Wharf Mall
Newport, RI 02840
Tel. 401.847.1008
E-mail qanthony@verizon.net

Dated: August 11, 2015

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PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID RATE DESIGN)
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DOCKET NO. 4568

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 Acadia Center, in the above-captioned proceeding.

Respectfully submitted,

/s/ Quentin Anthony

Quentin Anthony (RI # 1939)
41 Long Wharf Mall
Newport, RI 02840
Tel. 401.847.1008
E-mail qanthony@verizon.net

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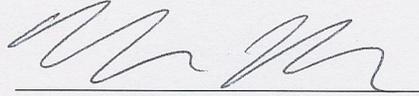


Mark E. LeBel
ACADIA CENTER
31 Milk Street, Suite 501
Boston, MA 02108
617-742-0054
mlebel@acadiacenter.org

Dated: August 11, 2015

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2015, I delivered a true copy of the foregoing documents either by first class mail or by electronic mail to the Docket 4568 Service List as of August 11, 2015.

A handwritten signature in black ink, appearing to read 'Mark E. LeBel', written over a horizontal line.

Mark E. LeBel