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STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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PUBLIC UTILITIES COMMISSION

IN RE: Docket No. 4568 - Review of The Narragansett Electric Company d/b/a National Grid - Review of Electric Distribution Design Pursuant to R.I. Gen. Laws § 39-26.6-24

**THE RHODE ISLAND ENERGY EFFICIENCY
RESOURCES MANAGEMENT COUNCIL'S MOTION TO INTERVENE**

NOW COMES the Rhode Island Energy Efficiency Resources Management Council ("EERMC"), and by and through its undersigned counsel, 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 its motion, EERMC avers:

1. Rule 1.13(a) of the PUC Rules states that "[p]articipation in a proceeding as an intervenor may be initiated by order of the Commission upon a motion to intervene."

2. The EERMC asserts that its right and interest in this proceeding is statutory in nature; the EERMC is the Rhode Island entity responsible for developing and recommending for implementation; plans, programs and standards for energy conservation, energy efficiency, and diversification of energy resources under R.I.G.L. §42-140.1-5. Further, pursuant to R.I.G.L. §42-140.1-5(d), the EERMC is authorized to participate in proceedings of the PUC that pertain to the purposes of the council.

3. The grounds for this Motion are that the EERMC has a unique and relevant interest in the PUC's consideration of "rate design and distribution cost allocation... appropriate cost responsibility and contributions to the operation, maintenance, and investment in the distribution system that is relied upon by all [National Grid] customers..." See National Grid's July 9, 2015, Executive Summary filed with the PUC in this matter. The

EERMC's interest is vested by in its enabling legislation, RIGL §42-140.1, *et. seq*, and is described in Paragraphs 2 and 4 of the instant motion.

4. The position of the EERMC in this proceeding will be in line with its statutory obligations to “[m]onitor and evaluate the effectiveness of programs to achieve energy efficiency, energy conservation, and diversification of energy resources,” as those obligations relate to the Rhode Island Renewable Energy Growth Program. R.I.G.L. §§42-140.1-3(3), 39-26.6-24.

5. Pursuant to Rule 1.15(b) of the PUC Rules, counsel for the EERMC contacted counsel for National Grid and the PUC on August 11, 2015 to obtain concurrence of those parties with this Motion. Both National Grid and PUC represented that they have no objection to this Motion.

6. 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 foregoing, the EERMC respectfully requests that the PUC grant this motion.

Respectfully submitted,
Rhode Island Energy Efficiency
Resources Management Council
By its Attorney



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CERTIFICATION

I hereby certify that I filed an original and ten (10) copies of the within Motion with the PUC and sent a true copy, via electronic mail, of the within Motion to the parties listed on the distribution list as reproduced below, on this 13th day of August, 2015.

A handwritten signature in black ink, appearing to be 'M. R.', is written above a horizontal line.

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