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November 7, 2015

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

**Re: Docket 4568**

Dear Ms. Massaro:

Enclosed please find an original and nine copies of the following document:

1. The Narragansett Bay Commission's Motion To Intervene.

Please note that an electronic copy of this document has been provided to the service list.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf

Enclosures

cc: Docket 4568 Service List (*via electronic mail*)

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

**IN RE: REVIEW OF THE NARRAGANSETT        :**  
**ELECTRIC CO. D/B/A NATIONAL GRID RATE :        DOCKET No. 4568**  
**DESIGN PURSUANT TO RIGL §39-26.6-24    :**

**THE NARRAGANSETT BAY COMMISSION'S MOTION TO INTERVENE**

NOW COMES the Narragansett Bay Commission (“NBC”), and pursuant to Rule 1.13 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission (“Commission”), moves that the Commission grant the NBC’s request to intervene as a party in the above-captioned docket for the reasons set forth herein:

1. The NBC is a non-profit public corporation established in 1980 by an act of the Rhode Island Legislature. The NBC was created for the purpose of acquiring, operating and upgrading the metropolitan Providence wastewater collection and treatment facilities. NBC assumed operational control of the Field’s Point Wastewater Treatment Facility on May 1, 1982. On June 27, 1991, the State of Rhode Island passed legislation mandating the merger of the NBC and the former Blackstone Valley District Commission. The merger became effective on January 1, 1992.
2. The NBC provides wastewater treatment and collection services to more than 360,000 residents and approximately 7,800 businesses in ten Rhode Island communities in the metropolitan Providence and Blackstone Valley areas.
3. The NBC’s mission is to maintain a leadership role in the protection and enhancement of water quality in Narragansett Bay and its tributaries by providing safe and reliable wastewater collection and treatment services to its customers at a reasonable cost.

4. In order to carry out its mission, and provide treatment services to its customers at a reasonable cost, the NBC began evaluating the use of wind energy in 2005.
5. This evaluation process led to the 2012 installation of three large scale wind turbines that provide power for the NBC's Field's Point Wastewater Treatment Plant.
6. This project has yielded significant benefits to the NBC and its ratepayers.
7. The NBC continues to evaluate potential renewable energy projects in effort to carry out its mission.
8. As the Commission knows, the NBC is currently performing feasibility studies to examine a potential Solar Power Project at its Bucklin Point Facility.
9. On July 1, 2015, the Commission opened Docket 4568.
10. In this Docket, the Commission is currently reviewing a filing by The Narragansett Electric Company d/b/a National Grid ("National Grid") for 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. The Commission will determine the appropriate cost responsibility and contributions to the operation, maintenance, and investment in the distribution system that is relied upon by all customers, including, without limitation, non-net metering and net-metering customers.
11. The NBC is concerned that National Grid's proposal, in particular the proposed Access Fee, could have an adverse impact on its development of future renewable energy projects and adversely impact the NBC's ratepayers.

12. Intervention in Commission proceedings is governed by Rule 1.13 of the Commission's Rules of Practice and Procedure, which states:

"Subject to the provisions of these rules, 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. Such right or interest may be:

(1) A right conferred by statute.

(2) 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, defendant, or respondent; holders of securities of the applicant, defendant, or respondent.)

(3) Any other interest of such nature that movant's participation may be in the public interest."

13. The NBC has a strong interest in the subject matter of this Docket that may be directly affected, and which is not adequately represented by existing parties in this Docket.

14. Currently, none of the parties in this Docket is a Rhode Island public entity engaged in the development of renewable energy projects.

15. As a result, NBC's participation in this Docket will be in the public interest as a public entity engaged in the development of renewable energy projects.

16. The following parties in this Docket have indicated that they do not object to the NBC's Motion – Conservation Law Foundation, Acadia Center, the Rhode Island Office of Energy Resources and the Northeast Clean Energy Council.

WHEREFORE, the Narragansett Bay Commission, requests that the Rhode Island Public Utilities Commission grant its Motion to Intervene and that it be granted status as a party in this proceeding, and that the Commission grant all other relief it deems meet and just.

THE NARRAGANSETT BAY COMMISSION,  
By its attorney,



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Dated: November 9, 2015

### CERTIFICATION

I hereby certify that on November 9, 2015, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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