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August 26, 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. New England Clean Energy Council'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 :**

NEW ENGLAND CLEAN ENERGY COUNCIL’S MOTION TO INTERVENE

NOW COMES the New England Clean Energy Council (“NECEC”), 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 NECEC the right to intervene as a party in the above-captioned docket for the reasons set forth herein:

1. NECEC is a regional non-profit clean energy business, policy and innovation organization that represents hundreds of clean energy companies and entrepreneurs throughout New England and New York.
2. NECEC’s mission is to accelerate the region’s clean energy economy by building an active community of stakeholders, clean energy companies and entrepreneurs.
3. NECEC works with clean energy businesses, entrepreneurs, policy makers and other stakeholders in the clean energy sector in New England through programs and initiatives that advance clean energy markets.
4. On July 1, 2015, the Commission opened Docket 4568, which was directly preceded by Docket 4545 (opened on January 16, 2015) and entitled Review of Electricity Rates Issues in Anticipation of 2015 Rate Design Review.
5. NECEC was an active participant in the predecessor Docket 4545.

6. In this Docket, the Commission will review 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.

7. 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."

7. NECEC's members are involved in developing small, medium, and large-scale renewable energy facilities and delivering energy efficiency services in Rhode Island.

8. As such, the NECEC and its members have 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.

9. NECEC has extensive experience in matters related to renewable energy and the implementation of renewable energy laws.
10. As a result, NECEC's participation in this Docket will be in the public interest as an advocate for clean energy.
11. The current parties in this Docket – National Grid, Conservation Law Foundation, Acadia Center and the Rhode Island Office of Energy Resources – have no objection to NECEC's Motion to Intervene.

WHEREFORE, the New England Clean Energy Council, requests that the 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.

NEW ENGLAND CLEAN ENERGY COUNCIL,
By its attorney,



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Dated: August 26, 2015

CERTIFICATION

I hereby certify that on August 26, 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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