



**DEPARTMENT OF THE NAVY**

NAVAL FACILITIES ENGINEERING COMMAND  
1322 PATTERSON AVENUE, SE, SUITE 1000  
WASHINGTON NAVY YARD, DC 20374-5065

**VIA FIRST CLASS MAIL AND ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
State of Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

September 17, 2015

Re: Review of the Narragansett Electric Company d/b/a National Grid Rate Design  
Pursuant to R.I. Gen. Laws § 39-26.6-24 – Docket No. 4568

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter is an original plus ten (10) copies of each of the following: Notice of Appearance of Counsel, and a Motion to Intervene.

Please call me at (202) 685-9122 if you have any questions concerning this filing. Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Genco", with a long horizontal line extending to the right.

Allison M. Genco, Esq.  
Department of the Navy  
Filing on Behalf of the  
Federal Executive Agencies

cc: Service List for Docket No. 4568

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

IN RE: REVIEW OF THE NARRAGANSETT :  
ELECTRIC COMPANY d/b/a NATIONAL GRID : DOCKET NO. 4568  
RATE DESIGN PURSUANT TO R.I. GEN. LAWS § 39-26.6-24 :

**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 the Department of the Navy, filing on behalf of the Federal Executive Agencies.

Dated: September 17, 2015

Respectfully submitted,

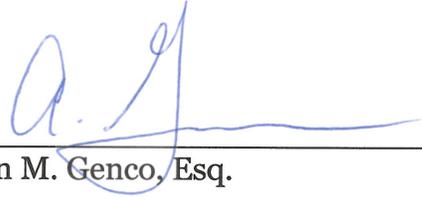


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Allison M. Genco, Esq.  
Department of the Navy  
Filing on Behalf of the  
Federal Executive Agencies  
1322 Patterson Avenue SE  
Suite 1000  
Washington Navy Yard, D.C. 20374  
(202) 685-9122  
allison.genco@navy.mil

**CERTIFICATE OF SERVICE**  
RI PUC Docket No. 4568

I hereby certify on this 17<sup>th</sup> day of September, 2015, I mailed this original Notice of Appearance of Counsel and ten (10) copies to the Rhode Island Public Utilities Commission, and sent a true copy of the document by electronic mail or first-class mail to the parties on the service list, as of September 8, 2015, for Docket No. 4568.



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Allison M. Genco, Esq.

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

IN RE: REVIEW OF THE NARRAGANSETT :  
ELECTRIC COMPANY d/b/a NATIONAL GRID : DOCKET NO. 4568  
RATE DESIGN PURSUANT TO R.I. GEN. LAWS § 39-26.6-24 :

**MOTION TO INTERVENE**

Pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission Rules of Practice and Procedure (“Rules”), the Department of the Navy (“DON”), on behalf of the Federal Executive Agencies, moves, by counsel, to intervene in the above-captioned proceeding. In support of this motion, the DON states as follows:

1. The DON maintains an installation within the State of Rhode Island served by National Grid. As a large customer of National Grid, the matters which are the subject of this docket could have a substantial impact on DON accounts. The DON has participated in several rate cases in the past that involve National Grid.

2. The DON recognizes that in accordance with the procedural schedule for this docket, established on 16 July, 2015, the deadline for Motions to Intervene was 31 August, 2015. However, the DON first learned of this proceeding on 14 September 2015, when a National Grid representative contacted DON personnel. Due to the fact that the DON only just became aware of this proceeding, it respectfully requests the Commission now grant it intervenor status in this docket. The DON does not seek to alter the established procedural schedule.

3. Rule 1.13(b) permits any person claiming “an interest of such nature that intervention is necessary or appropriate to submit a motion to intervene in any proceeding before the [PUC].”

4. Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.

5. It is necessary and appropriate to grant the DON's motion to intervene because the DON has a direct and significant interest in this proceeding that is not represented by the existing parties.

WHEREFORE, based on the reasons stated herein, the DON respectfully requests that the Rhode Island Public Utilities Commission grant this motion and allow the DON to intervene in this matter.

It is respectfully requested that all pleadings and other documents issued in this proceeding be served on counsel for the DON and the two individuals listed below, and that the Commission's official service list be modified to reflect the same.

Allison M. Genco, Esq.  
Office of Counsel  
NAVFAC HQ, Dept. of the Navy  
1322 Patterson Avenue SE  
Suite 1000  
Washington Navy Yard, D.C. 20374  
(202) 685-9122  
allison.genco@navy.mil

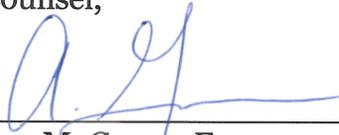
Kay Davoodi  
Director  
Utilities Rates and Studies Office  
NAVFAC HQ, Department of the Navy  
1322 Patterson Avenue SE  
Suite 1000  
Washington Navy Yard, D.C. 20374  
khojasteh.davoodi@navy.mil

Larry R. Allen  
Public Utilities Specialist  
Utilities Rates and Studies Office  
NAVFAC HQ, Dept. of the Navy  
1322 Patterson Avenue SE  
Suite 1000  
Washington Navy Yard, D.C. 20374  
larry.r.allen@navy.mil

Dated: September 17, 2015

Respectfully submitted,  
THE DEPARTMENT OF THE NAVY

By Counsel,

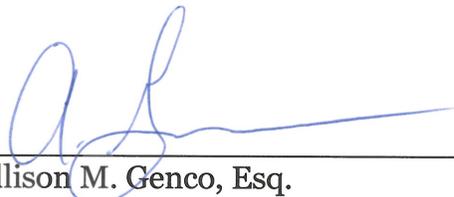


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Allison M. Genco, Esq.  
Department of the Navy  
Filing on Behalf of the  
Federal Executive Agencies

**CERTIFICATE OF SERVICE**  
RI PUC Docket No. 4568

I hereby certify on this 17<sup>th</sup> day of September, 2015, I mailed this original Motion to Intervene and ten (10) copies to the Rhode Island Public Utilities Commission, and sent a true copy of the document by electronic mail or first-class mail to the parties on the service list, as of September 8, 2015, for Docket No. 4568.



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Allison M. Genco, Esq.