

# Schacht & McElroy

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August 2, 2017

Luly E. Massaro  
Clerk  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

In Re: National Grid's Proposed Standard Offer Service Rates Pursuant to 2017 Standard Offer Service Procurement Plan – Docket No. 4605

Dear Luly:

Enclosed for filing are an original and 10 copies of Lieutenant Governor Daniel J. McKee's Motion to Intervene in this matter.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg  
cc: Service List

*McKee/Docket No. 4605/Motion to Intervene*

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID'S PROPOSED :  
STANDARD OFFER SERVICE RATES : DOCKET No. 4605  
PURSUANT TO 2017 STANDARD OFFER :  
SERVICE PROCUREMENT PLAN :

**MOTION TO INTERVENE OF LIEUTENANT GOVERNOR DANIEL J. McKEE**

Now comes Daniel J. McKee ("McKee"), by his undersigned counsel, and pursuant to the Notice of Public Hearing from the Public Utilities Commission ("Commission") dated July 28, 2017, hereby moves to intervene in this matter.

1. McKee is the Lieutenant Governor of the State of Rhode Island.
2. As the Lieutenant Governor, McKee serves as the Chairperson of the Small Business Advocacy Council pursuant to R.I.G.L. § 42-91-2(a).
3. As set forth in R.I.G.L. § 42-91-3(a): "The purpose of the council shall be to develop those specific and comprehensive recommendations for executive and legislative action as may be necessary and proper to maintain and encourage the continued viability of small businesses in the state."
4. Small businesses are the backbone of the Rhode Island economy. According to the Small Business Profile for Rhode Island published in 2016 by the United States Small Business Administration, Office of Advocacy, small businesses significantly impact Rhode Island's economy. As of 2013, small businesses represented 95.7% of all employers and employed 54.8% of the private-sector labor force. Rhode Island has 96,688 small businesses that employ 223,651 people.

5. Unfortunately, however, small businesses are historically under-represented in matters before the Commission. The interests of residential ratepayers are vigorously represented by the Division of Public Utilities and Carriers and the Attorney General. The industrial and large commercial ratepayers in Rhode Island are often represented by The Energy Council of Rhode Island (“TEC-RI”). However, we are unaware of any specific representation of the interests of small businesses in this docket. The proposed rate increase in this docket will have a significant adverse effect on both residential customers and small businesses in Rhode Island.

6. McKee, acting in his capacities as the Lieutenant Governor and the Chairperson of the Small Business Advocacy Council, respectfully moves to intervene as a full party in this docket.

7. Commission Rule 1.13 provides in pertinent part that “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.” The Rule goes on to further state that such a right or an interest may be:

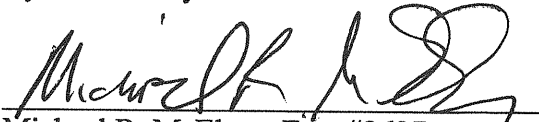
“. . . an interest which may be directly affected and which is not adequately represented by existing parties and as to which movants may be bound by the Commission’s action in the proceeding. (The following may have such an interest: consumers served by the applicant . . .).”

8. Rule 1.13 also provides that such right or interest may be “any other interest of such nature that movant’s participation may be in the public interest.”

WHEREFORE, pursuant to Rule 1.13, Lieutenant Governor Daniel J. McKee respectfully moves for intervention as a full party in this matter.

Respectfully submitted,  
Lieutenant Governor Daniel J. McKee  
By his attorneys

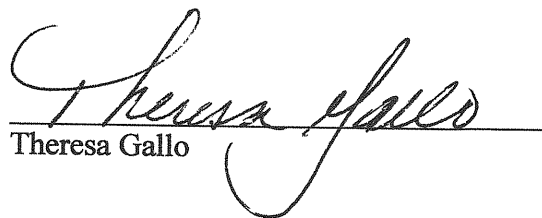
Date: August 2, 2017



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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of August, 2017, I sent a true copy of the foregoing to the attached service list.

  
Theresa Gallo

*McKee/Docket No. 4605/Motion to Intervene*

**Docket No. 4605 - National Grid – 2017 Standard Offer Service (SOS) and 2017 Renewable Energy Standard (RES) Procurement Plans  
Service List updated 7/26/17**

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<b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2017
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