

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

IN RE: THE NARRAGANSETT ELECTRIC :  
COMPANY D/B/A NATIONAL GRID REQUEST :  
FOR APPROVAL OF A GAS CAPACITY CONTRACT : DOCKET NO. 4627  
AND COST RECOVERY PURSUANT TO :  
R.I. GEN. LAWS § 39-31-1 TO 9 :

**MOTION FOR INTERVENTION  
OF THE RHODE ISLAND OFFICE OF ENERGY RESOURCES**

**I. INTRODUCTION**

Pursuant to Section 1.13 of the Public Utilities Commission (“PUC”) Rules of Practice and Procedure, the Rhode Island Office of Energy Resources (“OER”) files this Motion for Intervention. OER has a statutory right to intervene pursuant to R.I. Gen. Laws § 39-1-27.9. Furthermore, OER’s intervention in the above captioned matter is appropriate and in the public interest. Accordingly, this Motion for Intervention should be granted.

**II. ARGUMENT**

Section 1.13(b) of the PUC Rules of Practice and Procedure provides 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 [PUC].” Section 1.13(b)(1) of the PUC Rules of Practice and Procedure provides that such a right may be “conferred by statute”. R.I. Gen. Laws § 39-1-27.9 provides OER with a statutory right to intervene in PUC matters that impact OER. “In any commission inquiry into, or examination of matters that relate to or could potentially impact any programs, functions or duties of the office of energy resources . . . , the office of energy resources and the energy resources council shall be deemed, upon the formal request of the office or the council as appropriate, to be an interested party for all purposes, and as such, shall receive all notices and may file complaints, institute proceedings, **participate as a party in**

**administrative hearings.”** Emphasis added. See R.I. Gen. Laws § 39-1-27.9. In this case, National Grid’s request for approval for a gas capacity contract relates to and could potentially impact the functions and/or duties of OER including its duties under the Rhode Island Energy Resources Act codified by R.I. Gen. Laws § 42-140-1, et seq. and the Affordable Clean Energy Security Act codified by R.I. Gen. Laws § 39-31-1, et seq. Accordingly, OER has a statutory right to intervene.

Furthermore, Section 1.13(b)(3) of the PUC Rules of Practice and Procedure provides that such a right or interest to intervene may be “[a]ny other interest of such nature that movant’s participation may be in the public interest.” OER is an office in the executive department of the State government. See R.I. Gen Laws § 42-140-2. As such, OER serves the citizens of Rhode Island. In addition, OER is to “[a]dvice the governor and the general assembly with regard to energy resources and all matters relevant to achieving the purposes of the office.” See R.I. Gen Laws § 42-140-3(18). Accordingly, OER’s participation in the above captioned matter will be in the public interest as it will allow OER to better serve the citizens of Rhode Island and effectively advise the governor and the general assembly on matters related to energy resources in Rhode Island. OER’s statutory right and its interest in serving the citizens of Rhode Island are each of such nature that intervention in the above captioned matter is appropriate, if not necessary under state law.

### **III. CONCLUSION**

WHEREFORE, based on the reasons stated herein, OER respectfully requests that the PUC grant this Motion for Intervention.

[Signature page follows]

Rhode Island Office of Energy Resources,  
By its attorney,



---

Andrew S. Marcaccio (#8168)  
Department of Administration  
Division of Legal Services  
One Capitol Hill, 4<sup>th</sup> Fl.  
Providence, RI 02908  
Telephone: 401.222.3417  
Facsimile: 401.222.8244  
Email: [Andrew.Marcaccio@doa.ri.gov](mailto:Andrew.Marcaccio@doa.ri.gov)

CERTIFICATION OF SERVICE

I hereby certify that I filed the original and 3 hard copies of this Motion for Intervention with the PUC via mail. In addition, I electronically served a copy of this Motion to the service list. I certify that all of the foregoing was done on July 15, 2016.



---