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

Re: Docket 4651

Dear Ms. Massaro:

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

1. Rhode Island Center for Justice'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,

A handwritten signature in blue ink, appearing to read "John Willumsen-Friedman", written over a horizontal line.

John Willumsen-Friedman

Enclosures

cc: Docket 4651 Service List (via electronic mail)

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PUBLIC UTILITIES COMMISSION

February 1, 2017

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: TARIFF ADVICE TO IMPLEMENT :
ARREARAGE MANAGEMENT PROGRAM : DOCKET No. 4651
PROVISION RIPUC NO. 2130 AND RIPUC :
NG-GAS NO. 101 :

RHODE ISLAND CENTER FOR JUSTICE'S MOTION TO INTERVENE

The Rhode Island Center for Justice hereby moves to intervene in the above-captioned proceeding pursuant to Rule 1.13 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission ("Commission"). In support of this motion, the Rhode Island Center for Justice states the following:

1. The Rhode Island Center for Justice is a nonprofit public interest law center, providing legal assistance to low-income individuals and families across the State.
2. In partnership with the George Wiley Center, the Rhode Island Center for Justice provides legal assistance and advocacy to medically vulnerable low-income utility consumers.
3. In this Docket, the Commission will review National Grid's proposal to add a tariff provision to its electric and gas tariffs to implement an Arrearage Management Program (AMP) in accordance with the recent amendments to R.I. Gen. Laws §§ 39-2-1 and 39-1-27.12.
4. National Grid's proposed tariff provision (RIPUC No. 2171) contains practices and procedures for administering the AMP, a payment plan designed solely for low-income utility consumers at risk of or already experiencing utility termination.
5. 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.

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

7. The Center for Justice has extensive experience working with and advocating for utility consumers, work which often includes helping consumers enter into payment plans including the AMP.

8. As a result, the Center for Justice's participation in this docket as an advocate for low income utility consumers, the very group the AMP is designed to benefit, will be in the public interest.

WHEREFORE, the Rhode Island Center for Justice, 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.

Respectfully submitted,



John Willumsen-Friedman (#9592)
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jwillumsen@centerforjustice.org

Dated: February 01, 2017

CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2017, I mailed this original pleading and 10 copies to the Public Utilities Commission and sent a true copy of the document by electronic mail to the parties in the Docket 4651 Service List as of February 1, 2017.



John Willumsen-Friedman