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February 2, 2017

42 Weybosset Street

Providence

Rhode Island 02903

401 626.4839

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

**Re: Docket No. 4685 The Narragansett Electric Co. d/b/a National Grid-
Tariff Advice to Amend Street and Area Lighting – Customer Owned
Equipment Provision, RIPUC 2142 (S-05)**

Dear Luly:

I have enclosed the original and nine copies of a Motion to Intervene By PRISM Streetlights, Inc. d/b/a PRISM.

Thank you for your assistance with these filings.

Sincerely,



Seth H. Handy

Enc.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

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_____)
The Narragansett Electric Co. d/b/a National Grid)
- Tariff Advice to Amend Street and Area Lighting)
- Customer Owned Equipment Provision, RIPUC)
No. 2142 (S-05))
_____)

Docket No. 4685

MOTION TO INTERVENE
BY
PRISM STREETLIGHTS, INC. d/b/a PRISM

By its attorneys, Prism Streetlights, Inc. (PRISM), hereby moves to intervene in the above-captioned proceeding pursuant to Rule 1.13 (a) and (b) of the Rhode Island Public Utilities Commission (PUC) Rules of Practice and Procedure (Rules). In support of this motion, PRISM states:

1. PRISM is a statewide collaboration of RI municipalities developed to help municipalities better manage their streetlights at reduced cost.
2. PRISM has been engaged by 23 municipalities and three fire districts to assist them with the purchase and management of their streetlights.
3. Fire districts collect taxes for fire protection and for public roadway lighting and currently pay National Grid for the operation and maintenance of thousands of streetlights across Rhode Island.
4. Three of PRISM's member communities are well-managed and effective fire districts - Harrisville Fire District, Hopkins Hill Fire District, and Chepachet Fire District – and all are eager to own and operate their own streetlights.

5. When the Municipal Streetlights Investment Act was first heard and adopted by our General Assembly, one Senate Hearing confirmed that fire districts would be eligible to purchase and operate their streetlights under the Act. However, since then the intent has been unclear and this amendment would correct that. In 2016 National Grid refused a Notice of Intent sent by Hopkins Hill Fire District.
6. PRISM has worked with municipalities to resolve the issue presented by managing and upgrading streetlights on public roads that, for various reasons, have been billed to private customers.
7. Rule 1.13 states any person claiming an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the PUC.
8. Further, Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.
9. It is necessary and appropriate to grant PRISM the right to intervene in this proceeding.
10. PRISM supports the filing and also will seek to strengthen it by proposing simpler and improved wording by simply changing the word municipal to “streetlight customer.”
11. In this proceeding, PRISM will advocate for positions that are consistent with the public interest as put forth in many Rhode Island statutes and public policies and as are manifest in PRISM’s projects including, but not limited to, energy efficiency, energy security and resilience, stable and reduced energy costs, job creation and environmental benefit. PRISM has currently unrepresented interests in this proceeding that will be represented by this intervenor.

Please direct service of any correspondence or pleadings in connection with this proceeding to:

Jeffrey A. Broadhead
Executive Director
PRISM Streetlights, Inc. d/b/a PRISM
The Kenyon Building
344 Main Street, Suite 202
Wakefield, RI 02879
jb@wcrpc.org

and

Seth H. Handy
Handy Law, LLC
42 Weybosset Street
Providence, RI 02903
Phone: (401) 626-4839
E-mail seth@handylawllc.com

WHEREFORE, PRISM respectfully asks that the PUC grant this Motion to Intervene.

Respectfully submitted,

PRISM STREETLIGHTS, INC.

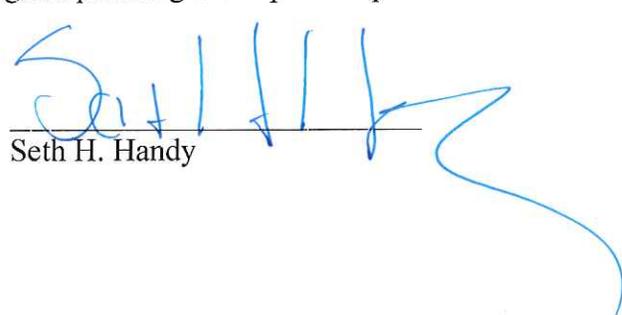
By their attorney,



Seth H. Handy (#5554)
HANDY LAW, LLC
42 Weybosset Street
Providence, RI 02903
Tel. 401.626.4839
E-mail seth@handylawllc.com

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2017, I sent a true copy of the document by electronic mail to the PUC and the service list and filed the original pleading and 9 photocopies with the PUC.



Seth H. Handy