

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

\_\_\_\_\_  
IN RE: TARIFF ADVICE TO AMEND )  
ELECTRIC TARIFF, ENTITLED STANDARDS )  
FOR CONNECTING DISTRIBUTED )  
GENERATION, RIPUC NO. 2180 )  
\_\_\_\_\_ )

Docket 4763

**SUPPLEMENT TO MOTION TO INTERVENE**  
**BY**  
**NEW ENERGY RHODE ISLAND**

By its attorneys, New Energy Rhode Island (NERI), hereby supplements its motion to intervene in this docket. We attach additional authorization letters from Providence Energy, LLC and Green Development, LLC dba Wind Energy Development, LLC. NERI has not asked to allow additional parties the right to intervene late – NERI’s advocacy is provided on behalf of member participants and additional participants may join in NERI’s advocacy as they become aware of their interests in this proceeding and NERI commits to advise the Commission of any new participants that have authorize NERI to represent them in this proceeding even if after the initial intervention.

National Grid’s claim that “NERI has provided no facts upon which a specific interest can be determined or the grounds for its intervention. . .[and] offers no specific support for the specific public interest that its participation will support” is inaccurate. First, the Commission is very well aware of the experience NERI participants have had with the interconnection of renewable energy projects in Rhode Island and their participation in advocating for the statute that is the central focus of these amendments. If the Commission were not well aware of those interests and the specificity of the interests in this proceeding had not been thoroughly outlined in the objection filed coincidentally

with NERI's motion to intervene, NERI would provide additional evidence of those interests to support this motion. NERI does not feel it necessary to supplement our filing and better demonstrate those interests. NERI trusts that the Commission understands how important it is to have industry voices at the table for these proceedings, especially since none other than NERI have sought to intervene or are currently participating. The Commission can rest assured that NERI participants would not seek to intervene if they did not have significant interests in this filing or believed that those interests were adequately represented by the Division.

National Grid's attempt to confine this tariff proceeding to the narrow bounds of its revisions is completely inappropriate. National Grid does not dictate the scope of interest in interconnection policy and its tariff by means of its proposed revisions. This is the renewable energy industry's opportunity to present its concerns on National Grid's administration of interconnection through its tariff. Under PUC Rule 1.13(f), the public interest clearly requires addressing the many substantial concerns raised in NERI's objection.

As for good cause for the tardiness of the motion, the Commission is well aware of the huge number of proceedings and issues that National Grid has put before the Commission for resolution just as it has filed its massive rate case. Commission counsel noted at a recent scheduling conference for Docket 4770 (the rate case), that there are hardly any major issues that National Grid will not have put before the Commission in the recent past or the coming months. The renewable energy industry is extremely busy with its (extremely and unnecessarily challenging) efforts to move State policy forward and does not have the same capacity to track and respond to these regulatory issues as National Grid's office of counsel, which is well staffed and funded by our ratepayers both to administer interconnection and advocate for its position on such matters. Despite outreach and effort, it took time for our industry members to review National Grid's proposed amendments and

could on intervention and asks the Commission's forgiveness for filing about two working weeks after the deadline. NERI felt it particularly important to participate in this docket as National Grid would have otherwise effectively overwhelmed the capacity of the industry's advocacy with all of its concurrent filings. It surprises NERI that National Grid felt it worthwhile to dedicate ratepayer funded legal resources to oppose the renewable energy industry's efforts to participate in this proceeding and to require NERI to dedicate much more limited resources to this response. Why is National Grid so interested in containing the advocacy rights of those so directly impacted by its interconnection tariff?

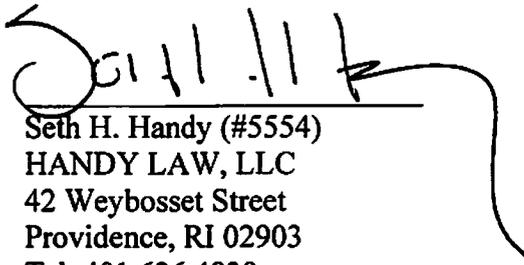
NERI's counsel hereby confirms that we mistakenly included reference to consultation with the service list and confirmation of whether participants in this docket had objections in our original motion to intervene. That was a form editing omission for which I take responsibility and ask forgiveness. We ultimately did not have time to make the consultation given the already past deadline for our filing.

NERI respectfully asks the Commission to grant NERI's intervention rather than submitting to National Grid's efforts to silence the renewable energy industry's concerns and comments, as are outlined thoroughly in NERI's objection.

Respectfully submitted,

**NEW ENERGY RHODE ISLAND**

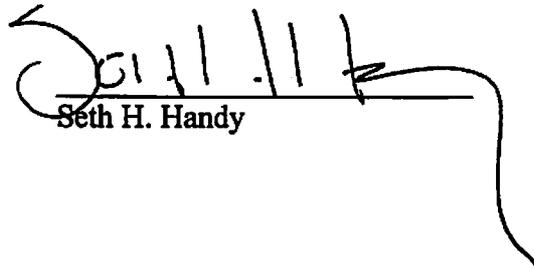
By their attorney,



Seth H. Handy (#5554)  
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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 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.

A handwritten signature in black ink, appearing to read "Seth H. Handy", is written over a horizontal line. The signature is stylized and includes a large loop on the left side and a long, sweeping tail on the right side.

Seth H. Handy

December 8, 2017

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

**Re: Docket No. 4763 - In re: Tariff Advice to amend Electric tariff entitled standards For connecting distributed Generation, RIPUC No. 2180**

Dear Ms. Massaro:

Please accept this letter as authorization that Handy Law, LLC represents Providence Energy LLC with regard to all issues considered in Docket 4763. We are a Rhode Island Based business. We appreciate the opportunity to participate in this very important stakeholder process.

Thank you.

Sincerely,



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Managing Director



December 15, 2017

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

**Re: Docket No. 4763 - In re: Tariff Advice to amend Electric tariff  
entitled standards For connecting distributed Generation, RIPUC No. 2180**

Dear Ms. Massaro:

Please accept this letter as authorization that Handy Law, LLC represents Green Development, LLC with regard to all issues considered in Docket 4763. We are a renewable energy development business with 41 employees in RI. We appreciate the opportunity to participate in this very important stakeholder process.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to be "A. J. [unclear]", written over a horizontal line.

Title: CEO