THE NARRAGANSETT ELECTRIC CO.	:	
D/B/A NATIONAL GRID - TARIFF ADVICE	:	DOCKET NO. 4763
TO AMEND ELECTRIC TARIFF, ENTITLED	:	
STANDARDS FOR CONNECTING	:	
DISTRIBUTED GENERATION, RIPUC NO. 2180	:	

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". OER possesses a statutory right to intervene pursuant to R.I. Gen. Laws § 39-1-27.9. The pertinent statutory language provides that "[i]n 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 and/or the energy efficiency and resources management council, including, but not limited to, those programs, functions and duties pursuant to this chapter and chapters 42-140, 42-140.1, 42-140.2, and 42-141, 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 addition to its statutory right, OER has an interest in serving the citizens of Rhode Island by carrying out its statutory duties under the Rhode Island Energy Resources Act codified by R.I. Gen. Laws § 42-140-1, et seq. as well as all other responsibilities conferred upon it by legislation or executive order. OER's statutory right and this interest are each of such nature that intervention in the above captioned matter is appropriate, if not necessary under state law.

Furthermore, Section 1.13(b)(3) of the PUC Rules of Practice and Procedure provides that such a right or interest 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 has a duty to serve the citizens of Rhode Island. In addition, OER is to "[a]dvise 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 because it allows 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.

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 legal counsel,

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Dated: November 8, 2017

CERTIFICATION OF SERVICE

I hereby certify that I filed the original and 10 copies of this Motion for Intervention with the PUC via mail. I certify that all of the foregoing was done on November 8, 2017.

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