

Rhodes Consulting, James G. Rhodes Esq.
860 West Shore Road
Warwick, Rhode Island 02889

January 24, 2018

*BY HAND DELIVERY
AND ELECTRONIC SERVICE*

Luly E. Massaro, Commission Clerk
State of Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: DOCKET NO. 4770, IN RE: APPLICATION OF THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID FOR APPROVAL OF A CHANGE IN ELECTRIC AND GAS BASE DISTRIBUTION RATES PURSUANT TO R.I. GEN. LAWS §§ 39-3-10 AND 39-3-11.

Dear Ms. Massaro:

Please accept for filing this Petition to Intervene on behalf of the Energy Consumers Alliance of New England, Inc. d/b/a People's Power and Light in the above-captioned proceeding.

Thank you for your attention.

Respectfully submitted,

ENERGY CONSUMERS ALLIANCE OF
NEW ENGLAND, INC.

By their counsel,



James G. Rhodes (#8983)

860 West Shore Rd.

Warwick, RI 02889

(401) 225-3441

Jamie.Rhodes@gmail.com

cc: Service List for Docket No. 4770
Enclosures

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

RHODE ISLAND PUBLIC UTILITIES COMMISSION

Application of The Narragansett Electric Company)
d/b/a National Grid for Approval of a Change in)
Electric and Gas Base Distribution Rates Pursuant to) Docket # 4770
R.I. Gen. Laws §§ 39-3-10 and 39-3-11)

MOTION FOR INTERVENTION OF
THE ENERGY CONSUMERS ALLIANCE
OF NEW ENGLAND

Introduction

1. Pursuant to the Public Utilities Commission’s (PUC) Rules of Practice and Procedure § 1.13 (a)-(c) the Energy Consumers Alliance of New England, Inc. d/b/a People’s Power and Light (PP&L) respectfully submits this Motion for Intervention in this Docket. Petitioner Narragansett Electric Company d/b/a National Grid (collectively National Grid), per their November 27, 2017 filing with the Commission, seeks to recover costs associated with the operation of the electric and gas distribution systems and the approval of its Power Sector Transformation Vision and Implementation Plan (PST Plan). National Grid estimates a rate increase of approximately \$41.3 million for the electric system and approximately \$30.3 million for the gas system. PP&L seeks full participant status in the above-captioned proceeding to explore and provide testimony regarding National Grid’s filing. On December 7, 2017, the PUC bifurcated National Grid’s initial filing into two dockets: one encompassing the initial rate case (Docket No. 4770) and the other encompassing National Grid’s PST Plan (Docket No. 4780).

2. Pursuant to PUC Rule of Practice and Procedure 1.15(b), counsel for Movants contacted National Grid and the Division of Public Utilities and Carriers (the Division) to determine whether either entity objected to Movants’ proposed intervention. Both parties have indicated that they have no objection to the Movants’

intervention.

Description of People's Power and Light

3. PP&L possesses relevant and material information and expertise regarding the subject matter of this docket. PP&L is a nonprofit organization whose mission is to harness the collective power of consumers to speed the transition to a low-carbon economy. It has been in existence since 2002 and merged with the Mass. Energy Consumers Alliance in 2006, which has been in operation since 1982. PP&L maintains a business office at 2 Regency Plaza #8, Providence, RI 02903.

4. PP&L advocates for consumers and the environment on local and statewide energy issues, and offers energy-related assistance and programming on green power, solar energy, electric vehicles, home heating, and energy efficiency. Specifically, it actively encourages and assists all of its approximately 5,000 members in Rhode Island and the general public to become more energy efficient. PP&L has a history of advocacy for the passage and effective implementation of policies and programs, including meeting target greenhouse gas (GHG) emission reductions in ways that promote the greatest consumer and economic advantages possible.

5. PP&L is an active member of the Energy Efficiency Collaborative, assisting in the development of energy efficiency plans, representing consumer and environmental interests. In Massachusetts, PP&L's executive director serves on Massachusetts's Energy Efficiency Advisory Council, an analogous body to Rhode Island's Energy Efficiency Resource Management Council.

6. Due to its unique set of skills, expertise, membership and interests, PP&L is an active member of both the Environment Council of Rhode Island and the Northeast Clean Energy Council, indicating unique experience including protecting the environment and developing of energy resources.

7. PP&L has actively participated in PUC proceedings on behalf of its members and in conjunction with other similarly situated parties. In addition to serving its own members, PP&L works in the general public interest, educating and

advocating for consumers. PP&L also works closely with key stakeholders throughout the State such as environmental groups, local energy committees, consumer advocates, and municipal officials.

Standard Governing this Motion

8. Intervention in PUC proceedings is governed by PUC Rules of Practice and Procedure § 1.13.

9. Pursuant to PUC Rule of Practice and Procedure 1.13(b) “any person claiming . . . an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission.” An interest satisfying this standard may be one 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,” or “[a]ny other interest of such nature that movant’s participation may be in the public interest.” PUC Rule of Practice and Procedure 1.13(b)(2)-(3).

Movant’s Interest in This Proceeding Supports Intervention

10. PP&L’s is a membership organization whose core function is the promotion of affordable and environmentally sustainable energy. Members are directly affected by the matters at issue in the above-captioned docket, and their membership and program participation demonstrates a strong support for the PP&L mission to promote clean energy and reduce GHG emissions.

11. Members would be expected to fund the costs of the Power Sector Transformation initiatives regardless of whether or not they would benefit directly. Likewise, they could also experience economic benefits from well-designed programs.

12. PP&L members have expressed a specific desire for measures that would cost-effectively reduce GHG emissions and seek a removal of barriers to

progress in those areas. PP&L members are owners of renewable energy generation resources, including solar and net metered, which will be impacted by the outcome of this Proceeding.

13. PP&L has served its members and the general public with home heating solutions including buyers groups and subsidized low-income service. The outcomes of the Proceeding will directly impact the ability of the organization to continue providing or the potential expansion of these services.

14. PP&L's participation in this proceeding is in the public's interest. The organizations mission is consistent with the public good of achieving real and measurable reductions of GHG emissions and mitigating the risk of a changing climate on our population and the environment, a state policy consistent with R. I. Gen. Laws §§ 42-6.2-1 *et. seq.* and R. I. Gen. Laws § 23-84-2.

Conclusion

WHEREFORE, the Energy Consumers Alliance of New England, Inc. d/b/a People's Power and Light respectfully request full intervenor status in the above-captioned dockets.

It is requested that all pleadings and other documents issued in this proceeding be served on counsel for People's Power and Light and the other individual listed below and that the Rhode Island Public Utilities Commission's service list be modified to reflect the same.

James G. Rhodes, Esq.
Rhodes Consulting
860 West Shore Rd.
Warwick, RI 02889
401-225-3441
jamie.rhodes@gmail.com

Kat Burnham
People's Power and Light
2 Regency Plaza
Suite #8
Providence, RI 02903
401-276-0600
kat@ripower.org

Respectfully submitted,

ENERGY CONSUMERS ALLIANCE OF
NEW ENGLAND, INC.

By their counsel,



James G. Rhodes (#8983)

860 West Shore Rd.

Warwick, RI 02889

(401) 225-3441

Jamie.Rhodes@gmail.com

Dated: January 24, 2018

CERTIFICATE OF SERVICE

I certify that that the original and nine copies of this Motion were delivered, in person, to the Clerk of the Public Utilities Commission, 89 Jefferson Blvd., Warwick, RI 02888. In addition, electronic copies of this Motion were served via e-mail to the service list for this Docket. I certify that all of the foregoing was done on January 24, 2018.

A handwritten signature in cursive script, appearing to read "Jan Rhod", is written above a horizontal line.