

Massaro, Luly (PUC)

From: John Willumsen-Friedman <jwillumsen@centerforjustice.org>
Sent: Monday, January 29, 2018 4:23 PM
To: Massaro, Luly (PUC)
Cc: Pamela Rutkowski; sherman@pbn.com; krabago@law.pace.edu; doug@tecri.org; nathan@votesolar.org; kat@ripower.org; Aboyd@acadiacenter.org; Mlebel@acadiacenter.org; ENiedowski@acadiacenter.org; chloechassaing@hotmail.com; Camiloviveiros@gmail.com; georgewileycenterri@gmail.com; Larry.r.allen@navy.mil; JReyes@brownrudnick.com; jditomasso@aarp.org; jbetter@necec.org; jdickerson@necec.org; mdavey@ssni.com; Frank@edp-energy.com; bchatham@vcharge-energy.com; loiter@optenergy.com; kdesrochers@veic.org; guerard@optenergy.com; marisa@desautelesq.com; Hogan, Margaret (PUC); Bianco, Todd (PUC); Nault, Alan (PUC); WilsonFrias, Cynthia (PUC); unger@hrtwd.com; mlucini@ismgroup.com; jdash@cleaneconomydevelopment.com; mc@green-ri.com; doug@newportsolarri.com; jb@wcrpc.org; bdaniels@rileague.org; seth@handylawllc.com; khojasteh.davoodi@navy.mil; kelsey.a.harrer@navy.mil; mgreene@clf.org; jelmer@clf.org; Gill, Carrie (DOA); Becca Trietch (DOA); Ucci, Nicholas (DOA); Musher, Danny (DOA); Kearns, Christopher (DOA); Grant, Carol (DOA); Marcaccio, Andrew; RoxieMcCullar@consultant.com; WilliamDunkel@consultant.com; sbobo@daymarkea.com; tbennett@daymarkea.com; mballaban@daymarkea.com; Gerwatowski, Ronald (DPUC); gerwat@verizon.net; mkahal@exeterassociates.com; tim.b.oliver@gmail.com; Boliver.rha@verizon.net; Djeffron@aol.com; jhall@synapse-energy.com; mwhited@synapse-energy.com; jkallay@synapse-energy.com; twolf@synapse-energy.com; Shilling, Joseph (DPUC); Kogut, Thomas (DPUC); Mancini, Al (DPUC); Bell, John (DPUC); McCleary, Macky (DPUC); Schrag, Jonathan (DPUC); Dmacrae@riag.ri.gov; Jmunoz@riag.ri.gov; Lwold@riag.ri.gov; aramos@hinckleyallen.com; Timothy.roughan@nationalgrid.com; kayte.o'neill2@nationalgrid.com; Najat.coye@nationalgrid.com; Scott.mccabe@nationalgrid.com; Ann.leary@nationalgrid.com; Theresa.burns@nationalgrid.com; William.richer@nationalgrid.com; Melissa.little@nationalgrid.com; Bill.Malee@nationalgrid.com; Joanne.scanlon@nationalgrid.com; Jennifer.hutchinson@nationalgrid.com; Celia.obrien@nationalgrid.com; Craig Waksler
Subject: [EXTERNAL] : PUC Docket No. 4770 - Petition to Intervene - George Wiley Center
Attachments: 4770 George Wiley Center.pdf

Ms. Massaro,

On behalf of the George Wiley Center, please find attached a motion to intervene in Docket 4770. Original plus nine copies have been placed in the mail.

Best,

John

--

John Willumsen-Friedman, Esq.
Deputy Director
Rhode Island Center for Justice
www.centerforjustice.org
1 Empire Plaza, Suite 410
Providence, RI 02903
[401-491-1101](tel:401-491-1101) ext. 810





Rhode Island Lawyers for the Public Interest

Jennifer L. Wood
Executive Director

Miriam Weizenbaum
Chair

BOARD OF DIRECTORS

Amato A. DeLuca
Vice Chair

Andrew Horwitz
Secretary

Vincent L. Greene IV
Treasurer

Sandra Cano

Robert L. Capone

Linn F. Freedman

Maureen Martin

Michael A. St. Pierre

Eliza Vorenberg

Joshua D. Xavier

January 29, 2017

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

Re: Docket 4780

Dear Ms. Massaro:

Enclosed please find an original and 10 copies of the following document:

1. George Wiley Center 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".

John Willumsen-Friedman

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: REVIEW OF THE NARRAGANSETT :
ELECTRIC CO. D/B/A NATIONAL GRID :
APPLICATION TO CHANGE ELECTRIC AND : Docket No. 4780
GAS DISTRIBUTION AND REVENUE REQUIREMENT :
AND ASSOCIATED RATES :

GEORGE WILEY CENTER'S MOTION TO INTERVENE

The George Wiley Center hereby moves, through counsel, 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 George Wiley Center is a grassroots, community-based organization, focused on social and economic justice in our state.
2. The George Wiley Center has been a leading voice advocating for the interests of low-income utility consumers for more than twenty-five.
3. On November 28, 2017, the Commission opened Docket No. 4780.
4. Pursuant to Rule 1.15 (b) of the Rules of Practice and Procedure for the Commission, the George Wiley Center, through counsel, contacted National Grid ("Grid") and the Division of Public Utilities and Carriers ("DPUC") to determine whether either of these entities has an objection to the George Wiley Center's proposed intervention in Docket No. 4780.
5. Both Grid and DPUC indicated in response that they have no objection to the George Wiley Center's intervention
6. 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.

7. 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.

8. The George Wiley Center has extensive experience working with and advocating for low-income utility consumers.

9. Furthermore, the George Wiley Center has participated, through counsel, without objection from any party, in previous Commission Dockets, including Docket 4600.

10. As a result of the foregoing, the George Wiley Center's participation in this docket as an advocate for low-income utility consumers will be in the public interest.

WHEREFORE, the George Wiley Center, through counsel, 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)
One Empire Plaza, Suite 410
Providence, RI 02903
(401) 491-1101 ext. 810
(401) 228-6780 (fax)
jwillumsen@centerforjustice.org



/s/ Camilo Viveiros

Camilo Viveiros
32 East Ave
Pawtucket, RI 02860
(401) 728-5555
camilioviveiros@gmail.com

Dated: January 29, 2017

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 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 4770 Service List as of January 29, 2017.



John Willumsen-Friedman