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January 24, 2018

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Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: PUC Docket No. 4770
PUC Docket No. 4780

Dear Madam:

Enclosed please find two unopposed motions to intervene of Acadia Center in the two-above docketed matters, along with the requisite copies and certificate of service along with my notice of appearance. The motion to appear pro hac vice of Amy E. Boyd is pending before the Rhode Island Supreme Court but has not yet been acted upon.

Thank you for your attention to these matters.

Very truly yours,

Robert D. Fine

RDF:ww

Enclosures

cc: Attorneys of Record
(Via E-Mail)

CR & F

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: REVIEW OF NATIONAL GRID)
PROPOSED POWER SECTOR)
TRANSFORMATION VISION AND)
IMPLEMENTATION PLAN)

DOCKET NO. 4780

UNOPPOSED MOTION TO INTERVENE OF ACADIA CENTER

By its attorney, Acadia Center hereby moves pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure (“Rules”) to intervene in the above-captioned proceeding. Acadia Center will be directly affected by the outcome of this proceeding, and its interests are not adequately represented by existing parties, consistent with the meaning of Rule 1.13(b). No parties object to Acadia Center’s intervention in this case.

Accordingly, Acadia Center respectfully asks the Commission to grant this petition to intervene, and, in support of its motion, states:

1. Acadia Center is a non- profit, research and advocacy organization committed to advancing the clean energy future through data-driven research, innovative policies, and market-based solutions. Acadia Center has become a central public interest voice in Rhode Island energy issues, on topics including energy efficiency, electric vehicles, energy storage, distributed generation, and grid modernization.
2. On November 27, 2017, pursuant to R.I. Gen. Laws §§ 39-3-10 and 39-3-11, The Narragansett Electric Company d/b/a National Grid (“Grid”) filed a ratemaking proceeding regarding its electric and gas distribution operations, including its Power Sector Transformation Vision and

Implementation Plan (“PST Plan”), docketed as No. 4770. The Commission bifurcated the original filing, creating this separate Docket No. 4780 to address the portions of Grid’s filing that relate to its PST Plan.

3. Pursuant to Rule 1.15(b) of the Commission Rules of Practice and Procedure, Acadia Center contacted Grid, the Division of Public Utilities and Carriers, the Office of Energy Resources, and Conservation Law Foundation, New Energy Rhode Island, and The Department of Navy, all current or pending parties in either Docket No. 4770 or Docket 4780, to determine whether any of these entities has an objection to Acadia Center’s intervention in this Docket. All parties replied that they have no objection to Acadia Center’s intervention.
4. Acadia Center has been active in Rhode Island and other northeastern states in researching and promoting consumer-friendly rate design that preserves incentives to use energy wisely and gives consumers greater control over energy bills. This expertise will be of considerable benefit to the Commission in this docket.
5. Acadia Center experts have researched and written about utility policy reforms and investments for a distributed energy future, including its 2015 resource, “UtilityVision.”¹ UtilityVision is a resource for regulators providing a framework for how reforms in five interdependent categories can be aligned to modernize the electric grid in a way that advances climate, economic, and consumer goals. UtilityVision provides recommendations in several categories that are relevant to wide-ranging proposals in Grid’s PST plan, including the performance incentive mechanism, rate design, and customer-side energy resources.
6. In recent years, Acadia Center has focused on utility rate design and the utility business model in an increasingly distributed energy system as a central component of its mission and program

¹ See: <http://acadiacenter.org/utilityvision/>

goals. The organization has devoted considerable time, effort, and monetary resources working to ensure that utility reforms and investments reduce system and customer costs and promote a clean distributed energy future.

7. In support of its mission surrounding utility rate design and reforming the utility business model for a distributed energy system, Acadia Center has participated in numerous public utility dockets relating to electric rate design and grid modernization, notably Rhode Island PUC Dockets No. 4568 and 4600, as well as Massachusetts Department of Public Utilities Dockets 14-04, 15-120, 15-122/123, 15-155, and 17-05 and Connecticut Public Utility Regulatory Authority Dockets No. 14-05-06, 16-16-04, and 17-10-46.
8. Acadia Center also has considerable experience and expertise in matters relating to Rhode Island energy efficiency policy. Acadia Center, previously known as Environment Northeast, has participated in the formulation of Rhode Island energy efficiency policy since prior to the formation of the Energy Efficiency and Resources Management Council, and until 2017 had a staff member who represented environmental interests on the EERMC. Acadia Center remains an active participant in the Collaborative planning process for Rhode Island's electric and natural gas energy efficiency programs. In addition, Acadia Center staff sit on the Massachusetts Energy Efficiency Advisory Council and the Connecticut Energy Efficiency Board, both of which review the planning and implementation of statewide gas and electric utility energy efficiency programs.
9. Acadia Center also has considerable experience and expertise relating to electric vehicle policy. Acadia Center has a staff member who was appointed to the Massachusetts Zero Emission Vehicle Commission, co-authored a report, *Charging Up*, on state and regional electric vehicle policy², and participated extensively in the Massachusetts D.P.U.'s docket on electric vehicles,

² <http://acadiacenter.org/document/charging-up/>

D.P.U. 13-182, as well as the one considering National Grid's proposal for EV infrastructure in Massachusetts (D.P.U. 17-13).

10. Rule 1.13(b) of the Commission Rules of Practice and Procedure states "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."
11. Further, Rule 1.13(b)(2) goes on to state that such a right or interest may be "an interest which may be directly affected and which is not adequately represented by existing parties."
12. Acadia Center's interests are directly affected by the issues in this proceeding and cannot be adequately represented by any other party. To build environmentally-friendly and consumer-friendly energy systems, Acadia Center spends considerable time, effort, and monetary resources working to advance the principles of UtilityVision in Rhode Island, Massachusetts, Maine, Connecticut, and New York.
13. Acadia Center was also a very active participant in the stakeholder process that led to creation of the Rhode Island Power Sector Transformation Phase One report. As National Grid's filing in this docket provides the first opportunity to implement the recommendations of that report, Acadia Center's interests in that proceeding, and the efforts and money spent through our involvement, could be damaged by exclusion from this docket.
14. Rule 1.13(b)(3) states that such a right or interest to intervene may be "any other interest of such nature that movant's participation may be in the public interest." Acadia Center's staff has a combined several decades of experience on the impact of utility rate design on consumer adoption of energy efficiency and clean energy technologies, and the ability of consumers to control their energy bills. Acadia Center has the capacity and organizational commitment to advance rate

design in Rhode Island that will further a clean environment and consumer benefits. As such, Acadia Center's participation in this proceeding is in the public interest.

15. On December 17, 2017 Acadia Center filed a petition for admission *pro hac vice* with the

Supreme Court to admit its attorney Amy Boyd for the purposes of this case. The petition has been docketed with the Supreme Court to be heard on January 25, 2018.

16. Accordingly, Acadia Center's intervention is necessary and appropriate under Rule 1.13(b)(2) and Rule 1.13(b)(3) of the Rules.

Service of any correspondence or pleadings in connection with these matters should be directed to:

Amy Boyd
Acadia Center
31 Milk Street Suite 501
Boston, MA 02109
617-742-0054 x.102
aboyd@acadiacenter.org

and

Robert D. Fine
Chace, Ruttenberg & Freedman, LLP
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Providence, RI 02903
Tel. 401-453-6400, x 115
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WHEREFORE, based on the foregoing reasons, ACADIA CENTER asks that the Commission grant its Motion to Intervene.

Respectfully submitted,

ACADIA CENTER

By its attorneys,

/s/ Robert D. Fine

Robert D. Fine (RI # 2447)
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Amy E. Boyd (*pro hac vice* pending)
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Dated: January 24, 2018

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: REVIEW OF NATIONAL GRID)	
PROPOSED POWER SECTOR)	DOCKET NO. 4780
TRANSFORMATION VISION AND)	
IMPLEMENTATION PLAN)	

NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.4 of the Rhode Island Public Utilities Commission’s Rules of Practice and Procedure, please enter my appearance on behalf of Acadia Center, in the above-captioned proceeding.

Respectfully submitted,

/s/ Robert D. Fine

Robert D. Fine (RI # 2447)
Chace, Ruttenberg & Freedman, LLP
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Tel. 401-453-6400, Ext 115
E-mail rfine@crflp.com

Dated: January 24, 2018

CERTIFICATE OF SERVICE

I certify that on January 24, 2018, the original and ten hard photocopies of this Motion and Notices of Appearance of Counsel were mailed by first class mail, postage prepaid to the Clerk of the Public Utilities Commission, 89 Jefferson Blvd., Warwick, RI 02888. In addition, electronic copies of this Motion and Notices of Appearances of Counsel were served via electronic mail on the service list for this Docket on January 24, 2018.

/s/ Robert D. Fine

Robert D. Fine