

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: Review of the Narragansett  
Electric Co. d/b/a National Grid  
Proposed Power Sector Transformation  
Vision and Implementation Plan

Docket No. 4780

**UNOPPOSED MOTION FOR INTERVENTION**  
**OF CONSERVATION LAW FOUNDATION**

**I. Introduction**

The Conservation Law Foundation (CLF), pursuant to Public Utilities Commission (PUC or the Commission) Rules of Practice and Procedure 1.13(a) and (b), respectfully files its (CLF's) Motion for Intervention in this Docket.

On November 27, 2017, The Narragansett Electric Co. d/b/a National Grid (Grid) made its filing with the Commission regarding its proposed Power Sector Transformation (PST) vision and implementation plan. Originally, this matter was combined with a rate case that Grid filed the same day, but later the Commission bifurcated the original docket and created this separate docket to address just the PST portions of the Grid filing of November 27, 2017

Pursuant to PUC Rule of Practice and Procedure 1.15(b), CLF contacted Grid and the Division of Public Utilities and Carriers (the Division) to determine whether either of these entities has an objection to CLF's proposed intervention in this Docket. Both replied that they have no objection to CLF's intervention.

## II. The Intervenor

CLF is New England's leading environmental advocacy organization. Since 1966, CLF has worked to protect New England's people, natural resources and communities. CLF is a nonprofit, member-supported organization with offices throughout New England. The Rhode Island CLF office is located at 235 Promenade Street., Suite 560, Providence, RI 02908.

CLF promotes clean, renewable and efficient energy production throughout New England and has an unparalleled record of advocacy on behalf of the region's environmental resources. As part of 50-year legacy, CLF was a party in the landmark case in which the U.S. Supreme Court ruled that the U.S. Environmental Protection Agency has an obligation under the Clean Air Act to consider regulating tailpipe emissions that contribute to global warming, Massachusetts v. E.P.A., 127 S. Ct. 1438 (2007); CLF obtained an injunction to stop drilling for oil and gas on the environmentally sensitive Georges Bank, Conservation Law Foundation v. Sec'y of the Interior, 790 F.2d 965 (1st Cir. 1986); litigated to ensure enforcement of an earlier settlement agreement in a case stemming from the Big Dig, which settlement agreement required 20 public transit projects in and around Boston including construction of additional subway and rail lines, Conservation Law Foundation v. Romney, 421 F. Supp.2d 344 (D. Mass. 2006); and successfully advanced legal strategies to restore groundfish to the Gulf of Maine and southern New England waters. Conservation Law Foundation v. Evans, 211 F. Supp.2d 55 (D.D.C. 2002).

### III. The Standard Governing this Motion

Intervention in PUC proceedings is governed by PUC Rule of Practice and Procedure 1.13.

PUC Rule of Practice and Procedure 1.13(b) states, in relevant part, that “any person claiming . . . an interest of such a nature that intervention is . . . appropriate may intervene in any proceeding before the Commission.”

PUC Rule of Practice and Procedure 1.13(e) states, in relevant part, that “all timely motions to intervene not objected to by any party within ten (10) days of service of the motion for leave to intervene shall be deemed allowed . . . .”

As noted above, CLF has contacted Grid and the Division to determine whether either has an objection to CLF’s proposed intervention in this Docket. Both entities responded; neither has an objection.

### IV. CLF’s Interest in This Proceeding

CLF is a membership organization, and CLF members are involved in multiple aspects of Rhode Island’s and New England’s energy markets, on both the gas and electricity sides. CLF members are owners of a variety of renewable energy resources, including those that net meter. CLF members are deeply involved in various matters that will be specifically addressed in this Docket 4780, and therefore stand to be directly affected by the outcome of this docket.

In addition, CLF is New England's leading environmental organization, and has a long and widely respected history of working on issues related to both renewable energy and distributed generation.

CLF was a full party in this Commission's most recent previous gas rate case, Docket No. 3943. CLF was also a full party in this Commission's most recent previous electricity rate case, Docket No. 4065. CLF was a full party in PUC Docket No. 4568, which addressed certain rate design issues pertaining to Distributed Generation, some of which issues are expected to re-appear in this current Docket No. 4770.

In addition, CLF has participated, without objection from any party, in many other previous PUC Dockets. These include Docket # 3659 (setting Rules pursuant to R. I. Gen. Laws § 39-26-1, et seq., the state's Renewable Energy Standard, or RES); Docket # 3765 (considering Grid's 2007 RES compliance procurement); Docket # 3901 (considering Grid's 2008 RES procurement); Docket # 4012 (considering Grid's 2009 RES procurement); Docket # 3932 (Grid's Least Cost Procurement Plan pursuant to R. I. Gen. Laws § 39-1-27.7); Docket # 4111 (first of two dockets concerning Deepwater Wind's proposed Block Island demonstration wind project); and Docket # 4185 (second of two dockets concerning Deepwater Wind's proposed Block Island demonstration wind project).

CLF has extensive experience with matters related to gas and electricity markets.

As a result of this history, both in Rhode Island and in the rest of New England, CLF can play a constructive and helpful role in this Docket.

Moreover, the participation in this proceeding of a public interest organization such as CLF will serve the public interest. See, generally, John E. Bonine, Public Interest Environmental Lawyers: Global Examples and Personal Reflections, 10 Widener L. Rev. 451 (2004) (emphasizing the constructive and salutary role of public-interest environmental lawyers in a wide range of legislative, judicial, and regulatory fora).

#### V. Conclusion

WHEREFORE, for the foregoing reasons, CLF respectfully requests that its unopposed motion to intervene in this Docket be granted.

CONSERVATION LAW FOUNDATION,  
by its Attorneys,



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CERTIFICATE OF SERVICE

I certify that the original and ten hard photocopies of this Motion 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 were served via e-mail on the service list for this Docket. I certify that all of the foregoing was done on December 13, 2017.

A handwritten signature in blue ink, appearing to read "J. E. B.", is written over a solid horizontal line. The signature is fluid and cursive in style.