



**DEPARTMENT OF THE NAVY**  
OFFICE OF THE GENERAL COUNSEL  
COUNSEL FOR THE  
NAVAL FACILITIES ENGINEERING COMMAND  
ATLANTIC  
6506 HAMPTON BLVD  
NORFOLK VIRGINIA 23508-1278

**VIA FIRST-CLASS MAIL AND ELECTRONIC MAIL**

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

January 11, 2018

Re: DOCKET NO. 4780, IN RE: THE NARRAGANSETT ELECTRIC COMPANY d/b/a  
NATIONAL GRID – PROPOSED POWER SECTOR TRANSFORMATION (PST)  
VISION AND IMPLEMENTATION PLAN

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter, please find an original plus nine (9) copies of the Department of the Navy's Notice of Appearance of Counsel and Motion to Intervene.

Please call me at (757) 322-4119 if you have any questions or concerns regarding this filing. Thank you for your assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kelsey A. Harrer", is written over a white background.

KELSEY A. HARRER, ESQ.

Assistant Counsel  
NAVFAC Atlantic  
Department of the Navy  
(757) 322-4119  
kelsey.a.harrer@navy.mil

cc: Service List for Docket No. 4780  
Enclosures

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC COMPANY :  
d/b/a NATIONAL GRID –PROPOSED POWER SECTOR : DOCKET NO. 4780  
TRANSFORMATION (PST) 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 the Department of the Navy, filing on behalf of the Federal Executive Agencies.

Dated: January 11, 2018

Respectfully submitted,

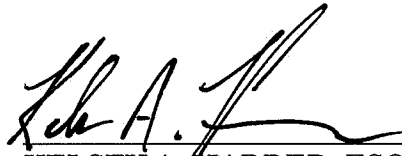
  
KELSEY A. HARRER, ESQ.

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6506 Hampton Blvd.  
Norfolk, VA 23508  
(757) 322-4119  
kelsey.a.harrer@navy.mil

**CERTIFICATE OF SERVICE**

RI PUC Docket No. 4780

I hereby certify on this 11th day of January, 2018, I mailed this original Notice of Appearance of Counsel and nine (9) copies to the Rhode Island Public Utilities Commission, and sent a true copy of the document by electronic mail to the parties on the service list, as of January 11, 2018, for Docket No. 4780.

  
KELSEY A. HARRER, ESQ.  
Department of the Navy

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC COMPANY :  
d/b/a NATIONAL GRID –PROPOSED POWER SECTOR : DOCKET NO. 4780  
TRANSFORMATION (PST) VISION AND :  
IMPLEMENTATION PLAN :

**MOTION TO INTERVENE**

Pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission Rules of Practice and Procedure (“Rules”), the Department of the Navy (“DON”), on behalf of the Federal Executive Agencies, moves, by counsel, to intervene in the above-captioned proceeding. In support of this motion, the DON states as follows:

1. On November 27, 2017, The Narragansett Electric Company d/b/a National Grid filed its proposed Power Sector Transformation (“PST”) Vision and Implementation Plan with the Rhode Island Public Utilities Commission (“PUC”), in addition to an application for authority to implement an increase in electric and gas base distribution rates pursuant to Rhode Island General Laws §§ 39-3-10 and 39-3-11. The Commission bifurcated the original docket addressing both of these matters and created this separate docket, Docket No. 4780, to specifically address the PST Vision and Implementation Plan filed by National Grid

2. Rule 1.13(b) permits any person claiming “an interest of such nature that intervention is necessary or appropriate to submit a motion to intervene in any proceeding before the [PUC].” Section 1.13(b)(1) of the PUC Rules provides that such an interest may be “[a]n 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.”

3. The DON has a justiciable interest that may be adversely affected by the outcome of this case. The DON maintains an installation within the State of Rhode Island that is served by National Grid. This installation, Naval Station Newport, provides facilities and infrastructure for approximately fifty (50) tenant commands and activities. As a large customer of National Grid with a strategic and vital interest in securing reliable, affordable gas and electricity, the matters which are the subject of this docket could have a substantial impact on DON accounts.

4. There are no other means available whereby the DON's interests may be protected. It is necessary and appropriate to grant the DON's motion to intervene because the DON has a direct and significant interest in this proceeding that is not represented by the existing parties and it is likely that the DON's positions will be different from those endorsed by any other party.

5. The DON has participated in several rate cases in the past that involved National Grid.

6. Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.

WHEREFORE, based on the reasons stated herein, the DON respectfully requests that the Rhode Island Public Utilities Commission grant this motion and allow the DON to intervene in this matter.

It is respectfully requested that all pleadings and other documents issued in this proceeding be served on counsel for the DON and the two other individuals listed below,

and that the Rhode Island Public Utilities Commission's official service list be modified to reflect the same.

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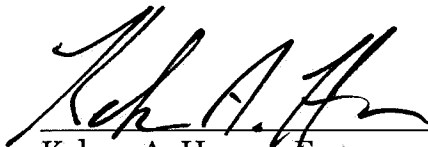
Kay Davoodi  
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larry.r.allen@navy.mil

Dated: January 11, 2018

Respectfully submitted,  
THE DEPARTMENT OF THE NAVY

By Counsel,




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Kelsey A. Harrer, Esq.  
Department of the Navy  
Filing on Behalf of the  
Federal Executive Agencies

**CERTIFICATE OF SERVICE**  
RI PUC Docket No. 4780

I hereby certify on this 11th day of January, 2018, I mailed this original Motion to Intervene and nine (9) copies to the Rhode Island Public Utilities Commission, and sent a true copy of the document by electronic mail to the parties on the service list, as of January 11, 2018, for Docket No. 4780.

  
Kelsey A. Harrer, Esq.