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January 24, 2018

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 nine copies of the following document:

1. Northeast Clean Energy Council's 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,



Joseph A. Keough, Jr.

JAK/kf
Enclosures
cc: Docket 4780 Service List (*via electronic mail*)

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

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

NORTHEAST CLEAN ENERGY COUNCIL’S MOTION TO INTERVENE

NOW COMES the Northeast Clean Energy Council (“NECEC”), and pursuant to Rule 1.13 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission (“Commission”), moves that the Commission grant NECEC the right to intervene as a party in the above-captioned docket for the reasons set forth herein:

1. NECEC is a regional non-profit clean energy business, policy and innovation organization that represents hundreds of clean energy companies and entrepreneurs throughout New England and New York.
2. NECEC’s mission is to accelerate the region’s clean energy economy by building an active community of stakeholders, clean energy companies and entrepreneurs.
3. NECEC works with clean energy businesses, entrepreneurs, policy makers and other stakeholders in the clean energy sector through programs and initiatives that advance clean energy markets.
4. On November 27, 2017, The Narragansett Electric Company, d/b/a National Grid (“National Grid”), filed an application to implement an increase in electric and gas base distribution rates, which included National Grid’s Power Sector Transformation Vision and Implementation Plan (“PST Plan”) (Docket 4770).

5. Following this original filing, the Commission opened a separate docket (4780) to separately address National Grid's PST Plan.
6. NECEC was an active participant in Docket 4568, which reviewed a filing by National Grid for rate design and distribution cost allocation among rate classes in light of net metering and the changing distribution system.
7. NECEC was also an active participant in Docket 4600, the Commission's 2016-2017 "Investigation Into the Changing Electric Distribution System," which produced a framework for evaluating the benefits and costs of investments in traditional utility infrastructure, energy efficiency, demand response, renewable energy, and new technologies.
8. NECEC was an active participant and contributor in the Office of Energy Resources, Division of Public Utilities and Carriers, and Public Utilities Commission proceedings regarding Governor Raimondo's Power Sector Transformation Initiative in 2017.
9. Many of the issues in these proceedings will be examined by the Commission in Dockets 4770 and 4780.
10. 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. NECEC's members are involved in developing small, medium, and large-scale renewable energy facilities and delivering energy efficiency services in Rhode Island.
8. As such, NECEC and its members have a strong interest in the subject matters of Dockets 4770 and 4780 that may be directly affected, and which are not adequately represented by the existing parties in these Dockets.
9. NECEC has extensive experience in matters related to energy efficiency, distributed and grid-scale clean and renewable energy, and the implementation of state policy, regulation, and laws affecting these resources and the companies that provide them.
10. As a result, NECEC's participation in these Dockets will be in the public interest as an advocate for clean energy.

WHEREFORE, the Northeast Clean Energy Council requests that the Commission grant its Motion to Intervene, that it be granted status as a party in this proceeding, and that the Commission grant all other relief it deems meet and just.

NORTHEAST CLEAN ENERGY COUNCIL,
By its attorney,



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CERTIFICATION

I hereby certify that on January 24, 2018, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

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