

**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 4780

**MOTION TO INTERVENE  
BY  
NEW ENERGY RHODE ISLAND**

By its attorneys, New Energy Rhode Island (NERI), moves to intervene in the above-captioned proceeding pursuant to Rule 1.13 (a) and (b) of the Rhode Island Public Utilities Commission (PUC) Rules of Practice and Procedure (Rules). In support of this motion, NERI states:

1. As reflected in the attached authorization letters, NERI’s member participants for this proceeding currently include Partnership for Rhode Island Streetlight Management, the Washington County Regional Planning Council, Green Energy Development, Heartwood Group, Inc., Newport Solar, Clean Economy Development, LLC, ISM Solar Development, LLC and the Rhode Island League of Cities and Towns. We expect additional entities to join in this advocacy and will update the PUC with any new participants in NERI’s advocacy in this docket.
2. NERI’s member participants either are developers or have ownership or other financial interests in Rhode Island energy projects.
3. Rule 1.13 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.”

4. Rule 1.13(b) defines an intervening interest as, “[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” or “[a]ny other interest of such nature that movant's participation may be in the public interest.” R.I. Code R. 53-2-16:17.
5. NERI has advocacy interests that will not be adequately represented by any other parties to this proceeding.
6. NERI actively participated in Docket 4600 and NERI members also participated in the Power Sector Transformation stakeholder process and National Grid's filing in this docket does not properly account for the results of either proceeding, so this case provides an important opportunity for NERI to follow up and ensure follow through on its specific advocacy from those proceedings.
7. National Grid's power sector transformation proposal is inadequately integrated in its proposed and is proposed as a cost adder rather than truly seeking out and implementing the many opportunities for avoided cost and benefits that were the subject and result of Docket 4600 and the Power Sector Transformation stakeholder processes.
8. NERI will advocate for a much better application and integration of the benefit cost analysis unanimously supported in docket 4600 into National Grid's power sector transformation plan and its base rate filing, rather than merely treating cost avoidance and value analysis as an afterthought only relevant to the power sector transformation portion of their filing and its initiatives.
9. The notion of a separate cost tracker just for power sector transformation initiatives undermines the cost avoidance intent of docket 4600 and the power sector transformation stakeholder process.

10. The failure to comprehensively consider the impacts of advance metering and time of use rates on well-integrated infrastructure safety and reliability (ISR) and system reliability planning (SRP) is one example of failed integration that will be addressed in NERI's advocacy.
11. NERI intends to address the interaction of return on equity and decoupling with the implementation of performance based incentives through it's own, unique expert testimony and advocacy, laying a foundation to displace the return on equity and decoupling model with strong, well-crafted performance based incentives.
12. The limited range and focus of National Grid's proposed performance based incentives warrants NERI advocacy, reconsideration and improvement.
13. National Grid's proposal to control storage and solar projects raises NERI's advocacy for market based solutions where monopoly control is not necessary or desirable.
14. In this proceeding, NERI will advocate for positions that are consistent with the public interest as put forth in many Rhode Island statutes and public policies and as are manifest in the projects in which NERI has interest including, but not limited to, electric supply diversification, energy security and resilience, stable and reduced energy costs, job creation and environmental benefit.
15. We have informed the service list of NERI's intent to intervene pursuant to Rule 1.13(e) and have yet to be informed of any objection.

Please direct service of any correspondence or pleadings in connection with this proceeding to:

Seth H. Handy  
Handy Law, LLC  
42 Weybosset Street  
Providence, RI 02903  
Phone: (401) 626-4839  
E-mail [seth@handylawllc.com](mailto:seth@handylawllc.com)

WHEREFORE, NERI asks that the PUC grant this Motion to Intervene.

Respectfully submitted,

**NEW ENERGY RHODE ISLAND**

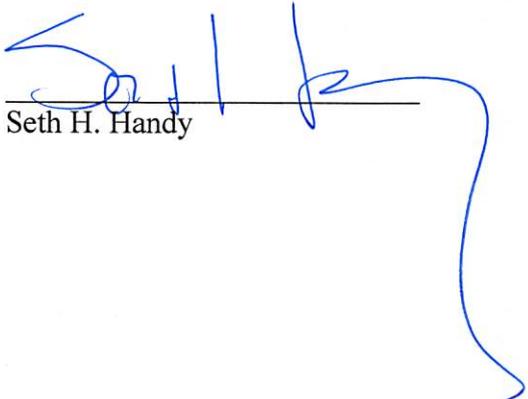
By their attorney,



Seth H. Handy (#5554)  
HANDY LAW, LLC  
42 Weybosset Street  
Providence, RI 02903  
Tel. 401.626.4839  
E-mail [seth@handylawllc.com](mailto:seth@handylawllc.com)

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2018, I sent a true copy of the document by electronic mail to the PUC and the service list and filed the original pleading and 9 photocopies with the PUC.



Seth H. Handy



# Rhode Island League of Cities and Towns

January 22, 2018

Luly E. Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

Re: Docket No. 4770 - In re: Application for Approval of a Change in Electric and Gas Base Distribution Rates and Docket No. 4880 - Power Sector Transformation (PST) Vision and Implementation Plan

Dear Ms. Massaro:

Please accept this letter as authorization that Handy Law, LLC represents the Rhode Island League of Cities and Towns with regard to all issues considered in Dockets 4770 and 4780. We are a nonprofit membership organization that provides services and support to all thirty-nine municipalities in the state. We appreciate the opportunity to participate in this very important stakeholder process.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian M. Daniels".

Brian M. Daniels  
Executive Director



The Kenyon Building  
344 Main Street, Suite 202  
Wakefield, Rhode Island  
02879

401.792.9900

**PRISM**

PARTNERSHIP FOR  
RI STREETLIGHT  
MANAGEMENT

[www.wcrpc.org](http://www.wcrpc.org)

January 22, 2018

Luly E. Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

**Re: Docket No. 4770 - In re: Application for Approval of a  
Change in Electric and Gas Base Distribution Rates and Docket  
No. 4880 - Power Sector Transformation (PST) Vision and  
Implementation Plan**

Dear Ms. Massaro:

Please accept this letter as authorization that Handy Law, LLC represents PRISM Streetlights and the Washington County Regional Planning Council with regard to all issues considered in Dockets 4770 and 4780. We are two related RI nonprofit corporations working in the energy sector with two employees and ten sub-contractors in RI. We appreciate the opportunity to participate in this very important stakeholder process.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey A. Broadhead".

Jeffrey A. Broadhead  
Executive Director,  
Washington County Regional Planning Council

Executive Director,  
PRISM Streetlights



376 Dry Bridge Rd.  
North Kingstown, RI 02852

January 22, 2018

Luly E. Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

Re: Docket No. 4770 - In re: Application for Approval of a Change in  
Electric and Gas Base Distribution Rates and Docket No. 4880 - Power  
Sector Transformation (PST) Vision and Implementation Plan

Dear Ms. Massaro:

Please accept this letter as authorization that Handy Law, LLC represents  
Newport Solar with regard to all issues considered in Dockets 4770  
and 4780. We are a Rhode Island solar installation business with fourteen employees in  
RI. We appreciate the opportunity to participate in this very important  
stakeholder process. Thank you.

Sincerely,  
Doug Sabetti  
Newport Solar  
NABCEP cert. #042013-114  
[doug@newportsolarri.com](mailto:doug@newportsolarri.com)  
401-787-5682



January 18, 2018

Luly E. Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

**Re: Docket No. 4770 - In re: Application for Approval of a Change in Electric and Gas Base Distribution Rates and Docket No. 4880 - Power Sector Transformation (PST) Vision and Implementation Plan**

Dear Ms. Massaro:

Please accept this letter as authorization that Handy Law, LLC represents Green Development, LLC ("Green") with regard to the issues considered in Dockets 4770 and 4780. Green provides commercial and utility scale renewable energy solutions focused on building sustainable communities throughout Rhode Island. The company currently has more than 30 employees and 25MW of operational wind and solar with significant additional turbines, solar and biomass plans under development statewide. We appreciate the opportunity to participate in this very important stakeholder process.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Carpenter", is written over a horizontal line.

Michelle Carpenter  
V.P. Development  
Green Development, LLC



January 22, 2018

Luly E. Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

**Re: Docket No. 4770 - In re: Application for Approval of a Change in Electric and Gas Base Distribution Rates and Docket No. 4880 - Power Sector Transformation (PST) Vision and Implementation Plan**

Dear Ms. Massaro:

Please accept this letter as authorization that Handy Law, LLC represents Clean Economy Development, LLC with regard to all issues considered in Dockets 4770 and 4780. We are a Rhode Island business with 2 employees in RI. We appreciate the opportunity to participate in this very important stakeholder process.

Thank you.

Name: Julian Dash

Title: Managing Partner

Signature:

A handwritten signature in black ink, appearing to read 'Julian Dash', is written over a horizontal line.

Date: January 22, 2018

January 22, 2018

Luly E. Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

**Re: Docket No. 4770 - In re: Application for Approval of a Change in  
Electric and Gas Base Distribution Rates and Docket No. 4880 - Power Sector  
Transformation (PST) Vision and Implementation Plan**

Dear Ms. Massaro:

Please accept this letter as authorization that Handy Law, LLC represents ISM Solar Development, LLC with regard to all issues considered in Dockets 4770 and 4780. We are a solar development business with two employees in RI. We appreciate the opportunity to participate in this very important stakeholder process.

Thank you.

Sincerely,

  
Michael Lucini  
Manager



**HEARTWOOD GROUP, INC.**

165 Evergreen Street, Providence, RI 02906

401-861-1650

1/22/18

Luly E. Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

**Re: Docket No. 4770 - In re: Application for Approval of a Change in Electric and Gas Base Distribution Rates and Docket No. 4880 - Power Sector Transformation (PST) Vision and Implementation Plan**

Dear Ms. Massaro:

Please accept this letter as authorization that Handy Law, LLC represents Heartwood Group, Inc. with regard to all issues considered in Dockets 4770 and 4780. We are a and energy project development and consulting business based in Providence, RI. We appreciate the opportunity to participate in this very important stakeholder process.

Thank you,

A handwritten signature in black ink, appearing to read 'Fred Unger', written in a cursive style.

Fred Unger, President