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February 12, 2018

*Via Electronic Mail and Hand Delivery*

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

**Re: Docket 4780 - The Narragansett Electric Company d/b/a National Grid's Proposed Power Sector Transformation (PST) Vision and Implementation Plan**

Dear Ms. Massaro:

Enclosed for filing in the above-referenced matter are ten (10) copies of The Company's Objection to New Energy Rhode Island's Motion for Leave to File Reply.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Adam M. Ramos".

Adam M. Ramos

AMR:cw  
Enclosures

cc: Docket No. 4780 Service List (electronically only)

57464394 (57972.174868)

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HINCKLEY, ALLEN & SNYDER LLP, ATTORNEYS AT LAW

57477359 v1

**Docket No. 4780 - National Grid – Power Sector Transformation Filing**  
**Service list updated 2/2/2018**

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

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IN RE: The Narragansett Electric Company d/b/a National )	Docket No. 4780
Grid's Proposed Power Sector Transformation )	
(PST) Vision and Implementation Plan )	
_____ )	

**THE COMPANY'S OBJECTION TO NEW ENERGY RHODE ISLAND'S  
MOTION FOR LEAVE TO FILE REPLY**

The Company<sup>1</sup> hereby objects to the New Energy Rhode Island's (NERI) Motion for Leave to File Reply (the Motion). The Rhode Island Public Utilities Commission (PUC) should deny the Motion because it is in direct contravention of the procedural process the PUC established for the pending motions to intervene. The PUC should not permit NERI to flout procedural direction. Therefore, the Company respectfully requests that the PUC deny the Motion and decline to consider the proposed reply brief that NERI submitted with the Motion.

On February 5, 2018, the PUC sent an email to everyone on the service list in this docket informing all parties about the procedure it would follow to resolve the contested motions to intervene. That email stated: "Chairperson Curran has decided that the PUC should conduct oral argument on the Motions and Objections in lieu of setting a reply deadline and then finding that oral argument may still be necessary." Thus, the PUC expressly directed parties that it would be addressing questions and issues raised by the motions to intervene through oral argument – not through reply briefs.

Nevertheless, two days later on February 7, 2018, NERI filed the Motion along with a ten (10) page reply brief that it asked the PUC to consider. NERI provides no basis in the Motion for the PUC to afford it special treatment for the consideration of its motion to intervene that

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (the Company).

differs from the uniform treatment that applies to the other motions. Rather, it simply states that it wants the opportunity to refute the arguments in the objection to the motion to intervene on paper. NERI, however, has not demonstrated any hardship that would warrant this treatment. It will have the opportunity at oral argument to make its arguments in support of its motion.

The PUC has the authority to determine how to manage the proceedings before it. See R.I. Gen. Laws § 39-1-11. Here, the PUC exercised that authority and directed the parties to be prepared to present issues and arguments beyond those presented in the papers already submitted through oral argument. The PUC should not now provide an exception to that procedure for NERI, particularly in light of NERI's failure to demonstrate any cause for an exception to the PUC's prescribed procedure.

WHEREFORE, the Company respectfully requests that the PUC deny the Motion and decline to consider the proposed reply brief submitted by NERI.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC COMPANY**

By its attorneys,



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