

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

THE NARRAGANSETT ELECTRIC CO. :  
D/B/A NATIONAL GRID'S PROPOSED POWER : DOCKET NO. 4780  
FOR APPROVAL OF A CHANGE IN ELECTRIC :  
AND IMPLEMENTATION PLAN :

**UNOPPOSED MOTION FOR INTERVENTION**  
**OF THE RHODE ISLAND OFFICE OF ENERGY RESOURCES**

**I. INTRODUCTION**

Pursuant to Section 1.13 of the Public Utilities Commission (“PUC”) Rules of Practice and Procedure, the Rhode Island Office of Energy Resources (“OER”) files this Motion for Intervention. OER has a statutory right to intervene pursuant to R.I. Gen. Laws § 39-1-27.9. In addition, OER’s intervention in the above captioned matter is appropriate and in the public interest.

In accordance with Section 1.15(b) of the PUC Rules of Practice and Procedure, OER asked National Grid, the Rhode Island Division of Public Utilities and Carriers (“DPUC”), and the Conservation Law Foundation (“CLF”) whether they would oppose OER’s Motion for Intervention. All three parties indicated that they would not. Accordingly, this Motion for Intervention should be granted.

**II. ARGUMENT**

Section 1.13(b) of the PUC Rules of Practice and Procedure provides that “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 [PUC].” Section 1.13(b)(1) of the PUC Rules of Practice and Procedure provides that such a right may be “conferred by statute”. OER possesses a statutory right to intervene pursuant to R.I. Gen. Laws § 39-1-27.9. The pertinent statutory language provides that “[i]n any commission inquiry into, or examination of matters that

relate to or could potentially impact any programs, functions or duties of the office of energy resources and/or the energy efficiency and resources management council, including, but not limited to, those programs, functions and duties pursuant to this chapter and chapters 42-140, 42-140.1, 42-140.2, and 42-141, the office of energy resources and the energy resources council shall be deemed, upon the formal request of the office or the council as appropriate, to be an interested party for all purposes, and as such, shall receive all notices and may file complaints, institute proceedings, **participate as a party in administrative hearings.**” Emphasis added. See R.I. Gen. Laws § 39-1-27.9. In addition to its statutory right, OER has an interest in serving the citizens of Rhode Island by carrying out its statutory duties under the Rhode Island Energy Resources Act codified by R.I. Gen. Laws § 42-140-1, et seq. as well as all other responsibilities conferred upon it by legislation or executive order. OER’s statutory right and this interest are each of such nature that intervention in the above captioned matter is appropriate.

Furthermore, Section 1.13(b)(3) of the PUC Rules of Practice and Procedure provides that such a right or interest may be “[a]ny other interest of such nature that movant’s participation may be in the public interest.” OER is an office in the executive department of the State government. See R.I. Gen Laws § 42-140-2. As such, OER has a duty to serve the citizens of Rhode Island. In addition, OER is to “[a]dvise the governor and the general assembly with regard to energy resources and all matters relevant to achieving the purposes of the office.” See R.I. Gen Laws § 42-140-3(18). Accordingly, OER’s participation in the above captioned matter will be in the public interest because it allows OER to better serve the citizens of Rhode Island and effectively advise the governor and the general assembly on matters related to energy resources in Rhode Island.

### **III. CONCLUSION**

WHEREFORE, based on the reasons stated herein, OER respectfully requests that the PUC grant this Motion for Intervention.

Rhode Island Office of Energy Resources,  
By its legal counsel,



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Dated: December 20, 2017

CERTIFICATION OF SERVICE

I certify that the original and ten copies of this Motion for Intervention were sent to the Public Utilities Commission, by regular U.S. mail. In addition, PDF copies of the Motion were served electronically on the entire service list of this Docket. I certify that all of the foregoing was done on December 20, 2018.

A handwritten signature in black ink, appearing to read "C. J. M.", is positioned above a horizontal line.