



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Administration
DIVISION OF LEGAL SERVICES
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November 13, 2019

SENT VIA FIRST CLASS MAIL AND ELECTRONIC MAIL:

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

Re: Pascoag Utility District's Demand Side Management Program 2020 - Docket No. 4991

Dear Ms. Massaro:

Please see attached Motion to Intervene (an original plus nine (9) copies) pertaining to the above-mentioned matter.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Daniel W. Majcher, Esq.

DWM/njr

Enclosure

c. Docket 4991 Service List

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

**IN RE: DOCKET NO. 4991 - PASCOAG UTILITY DISTRICT - 2020 DEMAND SIDE
MANAGEMENT PROGRAM (FILED 11/7/2019)**

MOTION TO INTERVENE
BY THE RHODE ISLAND OFFICE OF ENERGY RESOURCES

By its attorney, the Rhode Island Office of Energy Resources (“OER”), as an interested party, hereby moves to intervene in the above-captioned docket (“Docket”) in accordance with 810-RICR-00-00-1.14 of the Rhode Island Public Utilities Commission (“PUC”) Rules of Practice and Procedure (“Rules”). In support of this motion, OER provides as follows:

1. OER is a Rhode Island State entity responsible for implementing and overseeing the Governor’s energy policies and programs. Pursuant to R.I. Gen. Laws 42-140-1 *et seq.*, the OER was created by the General Assembly in 2006.
2. Section 810-RICR-00-00-1.14(B) of the Rules allows for 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. The OER’s participation in this Docket is in the public’s interest.
3. OER is referenced directly in Pascoag Utility District's Demand Side Management 2020 Report – Docket 4991 (“Report”). Specifically, the OER has worked in partnership with the Pascoag Utility District related to the recommendations and strategies stated in the Report. OER is a stakeholder and has a vested interest which is directly affected by this proceeding. Therefore, it is necessary and appropriate to grant OER’s motion to intervene.
4. Section 810-RICR-00-00-1.14(E) provides that where there is no objection to intervention within ten (10) days of service, a properly filed and served motion to intervene shall be allowed.

WHEREFORE, based on the reasons stated herein, the OER respectfully requests the PUC to grant this motion and allow the OER to intervene.

Respectfully Submitted,
The OFFICE OF ENERGY RESOURCES,

By their Attorney,



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In addition to myself, please direct service of any filings in connection with this proceeding to:

Carol Grant
Commissioner
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Along with the following OER representatives:

Nicholas Ucci -- Nicholas.Ucci@energy.ri.gov
Carrie Gil -- Carrie.Gill@energy.ri.gov
Becca Trietch -- Becca.Trietch@energy.ri.gov
Nathan Cleveland -- Nathan.Cleveland@energy.ri.gov

CERTIFICATE OF SERVICE

I, Nancy J. Russolino, hereby certify that on November 13, 2019, I mailed this original pleading and 9 copies to the PUC and sent a true copy of the document by electronic mail to the service list for Docket #4991.

