

April 13, 2020

BY ELECTRONIC MAIL

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

RE: Docket 5023 - Energy Efficiency and Resource Management Council (EERMC)
Proposed Energy Efficiency Savings Targets For 2021-2023
National Grid's Motion to Intervene

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed the Company's Motion to Intervene in the above-referenced docket.

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Sincerely,

Raquel J. Webster

cc: Docket 5023 Service List Jon Hagopian, Esq. John Bell, Division

40 Sylvan Rd. Waltham, MA 02451

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

In Re: Rhode Island Energy Efficiency and

Resource Management Council (EERMC) –

Proposed Three-Year Savings Target for : Docket No. 5023

The Narragansett Electric Co. d/b/a National

Grid's Energy Efficiency Procurement Plan

NATIONAL GRID'S MOTION TO INTERVENE

Pursuant to section 810-RICR-00-00-1.14 of the Rhode Island Public Utilities Commission (PUC) Rules of Practice and Procedure (Rule 1.14), The Narragansett Electric Company (National Grid or the Company) respectfully requests that the PUC grant the Company the right to intervene as a party in the above-captioned docket for the reasons set forth below:

- 1. The Rhode Island Energy Efficiency and Resource Management Council (EERMC) was created to oversee the creation, implementation and evaluation of the state's energy efficiency plan. *See* R.I. Gen. Laws § 42-140.1-3. The purpose of the EERMC, among other things, is to "[e]valuate and make recommendations, including, but not limited to, plans and programs, with regard to the optimization of energy efficiency, energy conservation, energy resource development; and the development of a plan for least-cost procurement for Rhode Island." R.I. Gen. Laws. § 42-140.1-3(b)(1).
- 2. The Company is an electric distribution company and public utility, as defined under §§ 39-1-2(12) and 39-1-2(20) of Rhode Island General Laws and is subject to the jurisdiction of the PUC under Title 39. The Company is charged with implementing annual and triennial energy efficiency plans pursuant to R.I. Gen. Laws § 39-1-27.7.

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- 3. On March 23, 2020, the EERMC filed with the PUC its proposed Energy Efficiency Savings Target for 2021-2023.
 - 4. The Company's interest in this Docket pursuant to Rule $1.14(B)(2)^1$ is as follows:
 - a. The filed targets are typically and historically linked to the energy efficiency goals that the Company proposes in its three-year and annual energy efficiency plan filings.
 - b. As noted in the EERMC's March 23, 2020 filing in this Docket, the energy efficiency savings targets are used as guideposts for the development of the goals in the Company's subsequent energy efficiency plan filings.
 - c. The targets set in this Docket will inform the goals proposed by the Company in the Company's 2021-2023 Three-Year Energy Efficiency Plan and subsequent annual plans.
- 5. The Company's interests are not adequately represented by existing parties, and the Company may be bound by the PUC's action in the proceeding. While the Company works closely with EERMC in promoting the state's energy efficiency goals and plans, energy efficiency is one of a number of other factors and variables that the Company must consider, including reliability and least cost procurement standards.
- 6. Given that the savings targets set in this Docket have a direct correlation and impact to the Company's Three-Year Energy Efficiency Plan and subsequent annual plans, the Company respectfully request that the PUC grant motion to intervene in this Docket.

¹ Pursuant to Rule 1.14(B)(2), a party may intervene when it has:

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.)

7. The Company conferred with counsel for the EERMC, and the EERMC does not object to this motion.

Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID

By its attorney,

Raquel J. Webster, RI Bar # 9064

National Grid 40 Sylvan Road Waltham, MA 02451 781-907-2121

Dated: April 13, 2019

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

April 13, 2020 Date

Joanne M. Scanlon

Docket No. 5023 - EERMC's Three-Year Savings Targets Service list updated 4/13/2020

Name/Address	E-mail Distribution List	Phone
National Grid	Raquel.webster@nationalgrid.com;	781-907-2121
Raquel Webster, Esq. National Grid	Joanne.scanlon@nationalgrid.com;	
	Celia.obrien@nationalgrid.com;	
	Matthew.Chase@nationalgrid.com;	
Leticia C. Pimentel, Esq. Robinson & Cole LLP	Timothy.Roughan@nationalgrid.com;	
	John.richards@nationalgrid.com;	
	Christopher.porter@nationalgrid.com;	
	Matthew.ray2@nationalgrid.com;	
	John.Tortorella@nationalgrid.com;	
	Kate.grant2@nationalgrid.com;	
	LPimentel@rc.com;	
Division of Public Utilities and Carriers Jon Hagopian, Esq. Leo Wold, Esq.	Jon.hagopian@dpuc.ri.gov;	401-784-4775
	Leo.wold@dpuc.ri.gov;	
	john.bell@dpuc.ri.gov;	
	Ronald.Gerwatowski@dpuc.ri.gov;	
	Joel.munoz@dpuc.ri.gov;	
Tim Woolf	twoolf@synapse-energy.com;	
Jennifer Kallay Synapse Energy Economics	jkallay@synapse-energy.com;	
RI EERMC	marisa@desautelesq.com;	401-477-0023
Marisa Desautel, Esq.		
Office of Marisa Desautel, LLC	guerard@optenergy.com;	
Mike Guerard, Optimal Energy	ross@optenergy.com;	

	kravatz@optenergy.com;	
Office of Energy Resources (OER) Daniel Majcher, Esq.	daniel.majcher@doa.ri.gov;	401-222-8880
Dept. of Administration	Nancy.Russolino@doa.ri.gov;	
Division of Legal Services	Christopher.Kearns@energy.ri.gov;	
	Nicholas.Ucci@energy.ri.gov;	
Nick Ucci, Commissioner	Becca.Trietch@energy.ri.gov;	
	Carrie.Gill@energy.ri.gov;	
	Nathan.Cleveland@energy.ri.gov;	
Original & 9 copies file w/:	Luly.massaro@puc.ri.gov;	401-780-2107
Luly E. Massaro, Commission Clerk	Cynthia.WilsonFrias@puc.ri.gov;	
John Harrington, Commission Counsel	John.Harrington@puc.ri.gov;	
Public Utilities Commission	Alan.nault@puc.ri.gov;	
89 Jefferson Blvd.	<u>Todd.bianco@puc.ri.gov</u> ;	
Warwick, RI 02888	Sharon.ColbyCamara@puc.ri.gov;	
	Margaret.hogan@puc.ri.gov;	
Acadia Center	HWebster@acadiacenter.org;	401-276-0600
Hank Webster, Director & Staff Atty.		x402
Green Energy Consumers Alliance	Larry@massenergy.org;	
Larry Chretien, Executive Director	kai@graananargyconsumars org	
Kai Salem	kai@greenenergyconsumers.org;	
TEC-RI	doug@tecri.org;	
Doug Gablinske, Executive Director		
The Energy Council of RI		