

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,<sup>1</sup> 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

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



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)<sup>1</sup> 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.

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<sup>1</sup> 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,



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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.



\_\_\_\_\_  
Joanne M. Scanlon

April 13, 2020  
Date

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

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