



Acadia Center

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October 21, 2021

Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: PUC Docket No. 5189

To whom it may concern:

Enclosed please find Acadia Center's Motion to Intervene in the above docketed matter, along with the requisite copies and certificate of service along with my notice of appearance.

Thank you for your attention to these matters.

Sincerely,

Henry (Hank) Webster
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STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: The Narragansett Electric Company d/b/a National
Grid Annual Energy Efficiency Plan for 2022

Docket No. 5189

MOTION TO INTERVENE OF ACADIA CENTER

By its attorney, Acadia Center hereby moves pursuant to Rule 1.14 of the Rhode Island Public Utilities Commission (“PUC”) Rules of Practice and Procedure (“Rules”) to intervene in the above-captioned proceeding. Acadia Center is a non-profit data and research organization that has been working in the public interest for over 20 years with a long history working on energy and environment issues on behalf of Rhode Islanders, consistent with the meaning of Rule 1.14(B)3. Further, Acadia Center will be directly affected by the outcome of this proceeding, and its interests are not adequately represented by existing parties, consistent with the meaning of Rule 1.14(B)2. Accordingly, Acadia Center respectfully asks the PUC to grant this petition to intervene, and in support of its motion, states:

1. On October 1, 2021, the Narragansett Electric Company d/b/a National Grid (Narragansett) filed with the PUC a proposed “Annual Energy Efficiency Plan for 2022” pursuant to Rhode Island General Laws §§ 39-1-27.7(c) and the Least Cost Procurement Standards as approved and adopted pursuant to Order No. 23890 in Docket No. 5015. In response, the PUC opened this Docket No. 5189.

2. Acadia Center is a non-profit research and advocacy organization committed to advancing the clean energy future through data-driven research, innovative policies, and market-based solutions. Acadia Center has become a central public interest voice in Rhode Island energy issues, on topics including, but not limited to, energy efficiency, natural gas infrastructure, climate planning, electric vehicles, energy storage, distributed generation, grid modernization, advanced metering functionality, and system reliability procurement.
3. Acadia Center has been active in Rhode Island and other Northeastern states in researching and promoting consumer-friendly and climate-conscious energy efficiency policies that improve public health, the environment, and the economy. This expertise will be of considerable benefit to the PUC in this docket.
4. Rule 1.14(B) of the PUC Rules of Practice and Procedure states “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 Commission.”
5. Rule 1.14(B)(2) further states that such a right or interest may be an “interest which may be directly affected, and which is not adequately represented by existing parties and as to which the movants may be bound by the Commission’s action in the proceeding.”
6. Acadia Center’s interests are directly affected by the issues in this proceeding and cannot be adequately represented by any other party. Acadia Center’s status as a settling party in: Docket 5076, the 2021-2023 Three-Year Energy Efficiency (EE) Plan; Docket 4770, the current multi-year rate case; Docket 4780, the Power Sector Transformation Vision and Implementation Plan; Docket 5080, the 2021-2023 System Reliability Procurement (SRP) plan; as well as our long-standing commitment to building environmentally-friendly and consumer-friendly energy systems and ensuring the

alignment of utility programs with state policy goals may all be directly impacted by this proceeding, binding Acadia Center with the decision.

7. Acadia Center has a substantial interest in advancing policies that achieve the state's greenhouse gas emissions reduction targets required by the 2021 Act on Climate law—specifically a 45% reduction below 1990 levels by 2030, 80% below 1990 levels by 2040, and net-zero emissions by 2050. As Rhode Island's utilities and energy efficiency plans will need to play a significant role in reducing carbon emissions from energy distribution networks, this docket represents one of the first opportunities to discuss the petitioner's plans to help achieve critical state policies, or a lost opportunity to put Rhode Island on track to achieve climate targets.
8. Acadia Center has considerable experience and expertise in matters relating to Rhode Island energy efficiency policy. Acadia Center, previously known as Environment Northeast, has participated in the formulation of Rhode Island energy efficiency policy since prior to the formation of the Energy Efficiency and Resources Management Council, and until 2017 had a staff member who represented environmental interests on the EERMC. Acadia Center remains an active participant of the Energy Efficiency (EE) Technical Working Group and System Reliability Procurement (SRP) Technical Working Group. Narragansett has routinely sought Acadia Center's assent as a settling party to energy efficiency plans and Acadia Center continues to work with Narragansett to improve the ambition and outcomes of the 2021-2023 Three-Year Plan, 2021 EE Plan, and proposed 2022 EE Plan. Acadia Center's interests in these processes, evidenced by the efforts and money spent to sustain our involvement in plan development, could be damaged by exclusion from this docket.
9. The Commission's Rules of Practice and Procedure 1.14(B)(3) also states that such a right or interest to intervene may also include "any other interest of such a nature that movant's participation may be in

the public interest.” Acadia Center’s staff has a combined several decades of experience on the design and implementation of consumer-friendly and climate conscious energy efficiency policies, utility innovation, and clean energy technologies. Acadia Center has the capacity and organizational commitment to advance climate and energy policy in Rhode Island that will further a clean environment and protect ratepayers from incurring unnecessary risk and costs.

10. Acadia Center experts have researched and written about energy efficiency reforms, including its “Next Generation Energy Efficiency” vision.”¹ Next Generation Energy Efficiency envisions refocusing energy efficiency programs so they 1) directly improve poorer quality housing that disproportionately burdens lower income residents and communities of color; 2) embrace clean electrification technologies for heating and cooling; and 3) do more to attain ambitious reductions in greenhouse gases and local air pollution. Acadia Center’s breadth of experience in regulatory proceedings across the Northeast is a valuable resource for the public interest of all Rhode Islanders.
11. Accordingly, Acadia Center’s intervention is necessary and appropriate under Rule 1.14(B)(2) and Rule 1.14(B)(3) of the PUC’s Rules of Practice and Procedure.

Service of any correspondence or pleadings in connection with these matters should be directed to:

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¹ <https://acadiacenter.org/resource/next-generation-energy-efficiency-brief/>

WHEREFORE, based on the foregoing reasons, ACADIA CENTER asks that the PUC grant its Motion to Intervene.

Respectfully submitted,

ACADIA CENTER

By its attorney,



Henry (Hank) Webster (RI # 9540)
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NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.5 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, please enter my appearance on behalf of Acadia Center, in the above-captioned proceeding.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that on October 21, 2021, the original and nine hard photocopies of this Motion and Notice of Appearance of Counsel were hand-delivered to the Clerk of the Public Utilities Commission at 89 Jefferson Blvd., Warwick, RI 02888. In addition, electronic copies of this Motion and Notices of Appearances of Counsel will be served via electronic mail on the service list for this Docket on October 21, 2021.

Respectfully submitted,



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