

June 23, 2021

Clerk
Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

Re: DPUC Docket No. D-21-09

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
Rhode Island Director & Staff Attorney
Acadia Center
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STATE OF RHODE ISLAND
DIVISION OF PUBLIC UTILITIES AND CARRIERS

IN RE: Petition of PPL Corporation, PPL Rhode Island Holdings, LLC, National Grid USA, and The Narragansett Electric Company for Authority to Transfer Ownership of The Narragansett Electric Company to PPL Rhode Island Holdings, LLC and Related Approvals

Docket No. D-21-09

MOTION TO INTERVENE OF ACADIA CENTER

By its attorney, Acadia Center hereby moves pursuant to Rule 1.17 of the Rhode Island Division of Public Utilities and Carriers' ("Division") 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 1.17 (B)1(c). 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 1.17(B)1(b). Accordingly, Acadia Center respectfully asks the Commission to grant this petition to intervene, and in support of its motion, states:

1. On May 4, 2021, PPL Corporation ("PPL"), PPL Rhode Island Holdings, LLC ("PPL Rhode Island"), National Grid USA ("National Grid USA") and the Narragansett Electric Company ("Narragansett") (collectively "Petitioners") filed with the Division a joint petition seeking Division approval for the transfer of ownership of Narragansett to PPL Rhode Island pursuant to Rhode Island General Laws §§ 39-3-24 and 39-3-25. In response, the Division opened this Docket No. D-21-09.
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 policies that help advance clean energy production and end uses that improve public health, the environment, and the economy. This expertise will be of considerable benefit to the Division in this docket.
4. Rule 1.17(B) of the Division Rules of Practice and Procedure states “any person with a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Division.”
5. Further, Rule 1.17(B)(2) goes on to state 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 Division’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 to the ongoing implementation of the settlement in Dockets 4770 and 4780, our efforts regarding the 2021-2023 Three-Year Energy Efficiency (EE) and System Reliability Procurement (SRP) plans, and our 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 will need to play a significant role in reducing carbon emissions from energy distribution networks, this docket represents the first opportunity 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 was a settling party in Dockets 4770 and 4780 and is a member of the Power Sector Transformation Advisory Group, including the Advanced Metering Functionality and Grid Modernization Plan Subcommittee, and the Electric Transportation and Energy Storage Subcommittee. Acadia Center's investment of time and expertise on these complex issues and the commitments of National Grid and Narragansett both through the settlement and in subcommittees may be affected by the Division's determination in this proceeding. A transfer of corporate ownership naturally presents the risk of program disruptions and delays, and worse, the potential reversal of negotiated beneficial policies by the new entity. This is a concern both for the public interest and the direct interest of Acadia Center's prior and ongoing investment of resources into Rhode Island climate and energy policy work.
9. 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 and has participated in numerous dockets for each program, including the most recent Public Utilities Commission (PUC) Docket 5076, the 2021-2023 Energy Efficiency Plan, and PUC Docket 5080, the 2021 SRP Plan. Acadia Center continues to work with Narragansett to advance the 2022 EE Plan and 2022 SRP Plan. Acadia Center's interests in those proceedings, and the efforts and money spent through our involvement, and the commitments by National Grid to date could be damaged by exclusion from this docket.

10. The Division's Rules of Practice and Procedure 1.17(B)(1)(c) 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 policies, energy efficiency, 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.
11. Acadia Center experts have researched and written about utility policy reforms and investments for a distributed energy future, including its 2015 resource, "UtilityVision."¹ UtilityVision is a resource for regulators providing a framework for how reforms in five interdependent categories can be aligned to modernize the electric grid in a way that advances climate, economic and consumer goals. UtilityVision provides recommendations in several categories that are relevant to this petition, including the utility business model, rate design, and customer-side energy resources. Acadia Center is also preparing a forthcoming publication that addresses many of the issues likely to be

¹ <https://acadiacenter.org/resource/utilityvision/>

raised in this proceeding, including: reforms to utility business model; integration of gas and electric system planning to achieve climate targets; and greater incorporation of equity considerations into utility planning and program delivery. Acadia Center's breadth of experience in regulatory proceedings across the Northeast is a valuable resource for the public interest of all Rhode Islanders.

12. Accordingly, Acadia Center's intervention is necessary and appropriate under Rule 1.17(B)(1)(b) and Rule 1.17(B)(1)(c) of the Division'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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WHEREFORE, based on the foregoing reasons, ACADIA CENTER asks that the Division grant its Motion to Intervene.

Respectfully submitted,

ACADIA CENTER

By its attorney,



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NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.5 of the Rhode Island Division of Public Utilities and Carriers' 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 June 23, 2021, the original and four hard photocopies of this Motion and Notices of Appearance of Counsel were hand-delivered to the Clerk of the Division of Public Utilities and Carriers at 89 Jefferson Blvd., Warwick, RI 02888. In addition, electronic copies of this Motion and Notices of Appearances of Counsel were served via electronic mail on the service list for this Docket on June 23, 2021.

Respectfully submitted,



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