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June 25, 2021

*BY HAND DELIVERY  
AND ELECTRONIC SERVICE*

Luly E. Massaro, Clerk  
State of Rhode Island  
Division of Public Utilities and Carriers  
89 Jefferson Blvd.  
Warwick, RI 02888

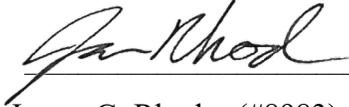
**Re: Petition of PPL Corporation, PPL Rhode Island Holdings, LLC, National Grid USA,  
and the Narragansett Electric Company for Authority to Transfer Ownership of the  
Narragansett Electric Company to PPL Rhode Island Holdings, LLC and Related  
Approvals**

Dear Ms. Massaro:

Please accept for filing this Petition to Intervene on behalf of Green Energy Consumers Alliance, Inc. in the above-captioned proceeding.

Thank you for your attention.

Sincerely yours,



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cc: Docket D-21-09 Service List

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 original and 9 copies are to be hand-delivered to the Division at 89 Jefferson Blvd. Warwick, RI 02888.

Paper copies are available upon request.



June 25, 2021

**Docket No. D-21-09 PPL Corp., PPL RI Holdings, LLC, National Grid USA and The Narragansett Electric Co. – Petition to Transfer Ownership and Related Approvals**

**Service List Updated 6/21/2021**

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been in existence since 2002 and merged with the Massachusetts Energy Consumers Alliance in 2006, which has been in operation since 1982. Intervenor maintains a Rhode Island business office at 188 Valley St., Suite 221. Providence, RI 02909.

4. Intervenor advocates for consumers and the environment on local and statewide energy issues and offers energy-related assistance and programming on green power, distributed energy, electric vehicles, grid modernization, home heating, and energy efficiency. Specifically, it actively encourages and assists all its approximately 5,000 members in Rhode Island and the general public to become more energy efficient. Each of these programs must be integrated with the utility, and, thus, impacted by this proceeding and binding Intervenor by this decision.

5. Intervenor is the leading REC supplier in National Grid's "GreenUp" program, which allows electricity consumers to support renewable energy and pay for the service through consolidated billing.

6. Intervenor has worked to promote municipal aggregation, whereby municipalities are able to aggregation the electricity demand of the accounts in their jurisdiction and engage in a competitive bidding process to achieve competitive rates to the utility, provide stable prices, and increase the amount of renewable energy being used in default supply services. These programs require billing and administrative support from the utility, and, thus, they are impacted by this proceeding and will bind the Intervenor by this decision.

7. Intervenor has a history of advocacy for the passage and effective implementation of policies and programs, including meeting target greenhouse gas (GHG) emission reductions in ways that promote the greatest consumer and economic advantages

possible. Advocacy efforts have included increasing the Renewable Energy Standard, offshore wind procurement, and Power Sector Transformation as described in Docket 4770 and 4780 at the Public Utilities Commission. The ultimate success of these programs relies upon the actions of the utility and will be impacted by this proceeding.

8. Intervenor has long been a proponent of distributed energy resources, both as an advocate and as a manager of group buying programs. Specific focus has been on, rooftop solar, energy efficiency, electric vehicles, and heat pumps. The successful adoption of these technologies requires long-term commitment and effective implementation by the utility and will be impacted by this proceeding.

9. Intervenor manages the “Shave the Peak” program. Shave the Peak offers consumers in New England information and a strategic opportunity to reduce energy consumption during periods of peak demand.

10. Due to its unique set of skills, expertise, membership and interests, Intervenor is an active member of both the Environment Council of Rhode Island and the Northeast Clean Energy Council, indicating unique knowledge including protecting the environment and developing of energy resources.

11. Intervenor has actively participated in PUC proceedings, specifically dockets 4770 and 4780, on behalf of its members and in conjunction with other similarly situated parties. In addition to serving its own members, Intervenor’s work is intended to be in the public interest through the education of consumers and advocating for programs intended to provide consumer benefits.

#### **Standard Governing this Motion**

12. Intervention in Division proceedings is governed by PUC Rules of Practice

and Procedure §1.17.

13. Pursuant to PUC Rule of Practice and Procedure §1.17(B) “...any person with...an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the division.” The rule continues establishing that “[s]uch...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.” Furthermore, Rule §1.17(B)(1)(c) also includes “[a]ny other interest of such a nature that movant’s participation may be in the public interest.”

**Movant’s Interests in This Proceeding Support Intervention**

14. Intervenor is a membership organization whose core function is the promotion of affordable and environmentally sustainable energy. Members are customers of the Petitioner and their membership and program participation demonstrate a strong support for Intervenor’s mission to promote clean energy and reduce GHG emissions, much of which relies on the ability and expertise of Narragansett Electric to accomplish.

15. The advocacy efforts and programs of Intervenor, as described in paragraphs 4-10 of this Motion, are actively supported by its members and require engagement with and affirmative obligations on Narragansett Electric as a responsible party for critical components of the Rhode Island’s climate policy. This includes, but is not limited to, procuring renewable energy, providing for the interconnection of distributed generation projects, and funding energy efficiency efforts.

16. Intervenor’s members have expressed a specific desire for measures that would cost-effectively reduce GHG emissions and seek a removal of barriers to progress in those areas. The specific goals include making significant progress on electrification of

transportation and heating.

17. Intervenor's participation in this proceeding is in the public's interest. The organization's mission is consistent with the public good of achieving real and measurable reductions of GHG emissions, mitigating the risk of a changing climate on our population and the environment, and doing so with regard to social equity and environmental justice, a state policy described in the 2021 Act on Climate. R. I. Gen. Laws §§ 42-6.2-1 *et. seq.*

18. This outcome of this docket will impact the decade and a half of work undertaken by Intervenor and its members, who are also customers of Narragansett Electric. As such, a decision in this docket will be binding upon Intervenor and its ability to fulfill its mission and deliver effective programs to its membership.

### **Conclusion**

WHEREFORE, Green Energy Consumer's Alliance, Inc. respectfully requests that the Division grant its motion to intervene in the above-captioned docket.

Respectfully submitted,

GREEN ENERGY CONSUMERS  
ALLIANCE, INC.

By their counsel,



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Dated: June 25, 2021

