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June 25, 2021

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

Re: Docket No. D-21-09

Dear Luly:

Enclosed for filing in this matter are an original and four (4) copies of New England Cable & Telecommunications Association, Inc's Motion to Intervene in this docket. Electronic copies have been sent to the service list.

If you need any further information, please do not hesitate to contact me.

Very truly yours,



Leah J. Donaldson

Cc: Service list

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 : Docket No. D-21-09
AUTHORITY TO TRANSFER OWNERSHIP OF THE :
NARRAGANSETT ELECTRIC COMPANY TO PPL RHODE :
ISLAND HOLDINGS, LLC AND RELATED APPROVALS :

NEW ENGLAND CABLE & TELECOMMUNICATIONS ASSOCIATION, INC'S
MOTION TO INTERVENE

Pursuant to 815-RICR-00-00-1.17 ("Rule 17") of the Rules of Practice and Procedure of the Division of Public Utilities and Carriers ("Division"), New England Cable & Telecommunications Association, Inc. ("NECTA"), by and through its undersigned counsel, hereby moves to intervene as a full party in this docket.

NECTA is a regional trade association representing cable and telecommunications companies in Rhode Island, Connecticut, Massachusetts, New Hampshire, and Vermont. For over 40 years, NECTA has represented the interests of the cable and telecommunications industry before state and federal regulatory agencies, courts, and legislatures.

Pursuant to Rule 17(b), intervention is allowed when an entity has "an interest of such nature that intervention is necessary or appropriate..." Appropriate intervenors include those who have 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 Division's action in the proceeding." Rule 17(b)(1)(b). Appropriate intervenors include those who have "any other interest of such nature that movant's participation may be in the public interest." Rule 17(b)(1)(c).

NECTA's interests will be directly affected by this proceeding and cannot be adequately represented by existing parties. NECTA's members or their affiliates offer broadband internet, home phone, and other telecommunications services in Rhode Island. Those services are distributed

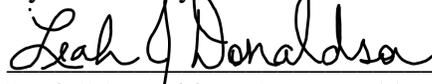
to Rhode Island customers using cables and associated equipment attached to over 200,000 utility poles that are wholly or jointly owned by The Narragansett Electric Company. Transfer of ownership from National Grid to PPL will include transfer of management and control of the utility poles and related pole attachments. Therefore, the transfer will impact the rights and duties of NECTA's members and their affiliates who utilize the poles to deploy their services across Rhode Island.

Further, NECTA's participation in this docket is in the public interest. The services offered by NECTA's members and their affiliates are critical to economic activity and daily life in Rhode Island. Reliable high-speed broadband internet service is necessary for Rhode Islanders with K-12 students engaged in distance learning, college students attending virtual classes, employees working remotely, patients using telehealth, as well as for thousands of other businesses and organizations, including municipal and state governments, in Rhode Island. NECTA's participation in this docket will safeguard access to these essential services.

For these reasons, NECTA respectfully requests that its Motion to Intervene in this docket be granted.

NEW ENGLAND CABLE & TELECOMMUNICATIONS
ASSOCIATION, INC.

By its attorneys



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Dated: June 25, 2021

CERTIFICATE OF SERVICE

I certify that an original and four (4) copies of this motion were filed with the Clerk of the Division of Public Utilities and Carriers, 89 Jefferson Boulevard, Warwick, RI 02888. In addition, electronic copies were served via email on the service list for this docket. I certify that the foregoing was done on June 25, 2021.



Leah J. Donaldson, Esq.