

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DIVISION OF PUBLIC UTILITIES AND CARRIERS**

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IN RE: Petition of PPL Corporation, PPL Rhode )	
Island Holdings, LLC, National Grid USA, and )	
The Narragansett Electric Company for Authority )	Docket D-21-09
to Transfer Ownership of The Narragansett Electric )	
Company to PPL Rhode Island Holdings, LLC )	
and Related Approvals )	

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**NEW ENERGY RHODE ISLAND’S OBJECTION TO PPL CORPORATION  
AND PPL RHODE ISLAND HOLDINGS, LLC’S MOTION TO STRIKE**

By its attorneys, and on behalf of its members, New Energy Rhode Island (“NERI”), pursuant to Rule 1.19(D) of the Rhode Island Division of Public Utilities and Carriers (“DPUC”) Rules of Practice and Procedure (the “Rules”), objects to PPL Corporation’s and PPL Rhode Island Holdings, LLC’s (collectively “PPL”) motion to strike NERI’s Motion for Recusal. NERI reasserts that the hearing officer’s demonstrated bias against distributed energy resources undermines confidence in his capacity to impartially adjudicate issues central to the resolution of the pending motion to intervene and the public interests in the sale of Narragansett Electric Company. NERI’s motion should not be stricken from the record.

The Rhode Island General Laws require that “the proposed transaction will not unfavorably impact the general public.” R.I. Gen. Laws § 39-3-25. As the public interest is central to the outcome of this proceeding, all concerns raised that have implications on the public interest should remain part of the record. In both its Motion to Intervene and Motion for Recusal, NERI has effectively demonstrated that Rhode Island policy favors distributed generation resources by citing relevant statutes and state-funded reports. The Hearing Officer, on multiple occasions, has made unsupported, prejudicial remarks that are contrary to state

policy. For the benefit of the public, the record should reflect the full scope of circumstances surrounding the approval of this sale.

NERI respectfully requests denial of the motion to strike.

Date: August 6, 2021

Respectfully submitted,

**NEW ENERGY RHODE ISLAND,  
CIRCULAR FUELS, LLC, RER  
ENERGY GROUP, LLC, CLEAN  
ECONOMY DEVELOPMENT, LLC,  
THE HEARTWOOD GROUP, INC.,  
GREEN DEVELOPMENT, LLC AND  
DR. KENNETH PAYNE**

By their attorneys,

/s/ Seth H. Handy  
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CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2021, I sent a true copy of the document by electronic mail to the Division and the service list and filed the original pleading and four (4) photocopies with the Division.

/s/ Seth H. Handy  
Seth H. Handy