

August 1, 2022

Ms. Luly Massaro, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

Re: Motion to Intervene in Docket 4978

Dear Ms. Massaro:

Attached to this email and mailed by regular mail (10 copies) are the Rhode Island Center for Justice's Motion to Intervene on behalf of the George Wiley Center and low-income utility customers directly affected by Docket 4978 – Narragansett Electric Co. d/b/a Rhode Island Energy – Last Resort Service Rates.

Please note that an electronic copy of this document and the Intervention Motion have been provided to the service list in Docket 4978.

Thank you for your attention to this matter.

Respectfully submitted,



Jennifer L. Wood  
Executive Director

c: Service list Docket 4978 as of August 1, 2022

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: THE NARRAGANSETT ELECTRIC CO.  
D/B/A RHODE ISLAND ENERGY – LAST RESORT  
SERVICE (LR) RATES**

**DOCKET NO. 4978**

**MOTION FOR  
INTERVENTION**

The George Wiley Center hereby moves, through counsel, to intervene in the above-captioned proceedings on behalf of low-income utility consumers pursuant to Rule 1.14 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission ("Commission") (R.I. Code of Regulations, Title 810, Chapter 00, Subchapter 00, Part 1, Section 1.14). In support of this motion, the George Wiley Center states the following:

1. The George Wiley Center is a grassroots, community-based organization comprised of low-income consumers and focused on advocacy for social and economic justice in our state. The George Wiley Center works in partnership with its counsel, the R.I. Center for Justice, a nonprofit public interest law center, to provide legal assistance to low-income individuals and families across the State relating to their rights as consumers.
2. The George Wiley Center has been a leading voice advocating for the interests of low-income consumers in Rhode Island for more than forty years.
3. Intervention in Commission proceedings is governed by Rule 1.14 of the Commission's Rules of Practice and Procedure, which states at Rule 1.14(B):

Subject to the provisions of these rules, 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. Such right or interest may be:

1. A right conferred by statute.
2. 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 Commission's action in the proceeding. (The following may have such an

interest: consumers served by the applicant, defendant, or respondent; holders of securities of the applicant, defendant, or respondent.)

3. Any other interest of such nature that movant's participation may be in the public interest.

4. The Commission rule further provides that “all timely motions to intervene not objected to by any party within ten (10) days of service of the motion for leave to intervene shall be deemed allowed” (Rule 1.14(E)).

5. The George Wiley Center advocates for and works with low-income consumers, all of whom will be directly affected by the proposed rate increases in Docket 4978. Through its counsel, the R.I. Center for Justice, the George Wiley Center also facilitates legal representation for low-income consumers seeking to protect their rights as consumers under the law. The George Wiley Center conducts meetings and workshops with low-income utility consumers on a regular basis in order to remain fully informed about the lived experience of low-income consumers, particularly as it relates to their challenges in maintaining affordable utility services in the homes they own and rent.

6. Economic impact on all customers, including low-income customers, and sustainable access to affordable utility service are central considerations in the PUC's review of the proposed rate increases in Dockets 4978, and the George Wiley Center is uniquely capable to help to inform issues of economic impact on directly affected low-income consumers due to its extensive work with these affected consumers over several decades.

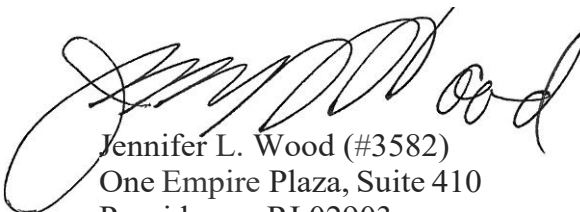
7. The George Wiley Center has participated, through its counsel the R.I. Center for Justice, without objection, in many previous PUC Dockets including, most recently, Dockets 4651, 4770, 4780, 4890, and 5022. The George Wiley Center, through its counsel the R.I. Center for Justice, has particularly prioritized participating in rate setting dockets and has done so without objection in several rate dockets in recent years due to its unique ability to reflect the lived experiences and economic circumstances of low-

income utility customers.

8. The George Wiley Center's participation in docket 4978 as an advocate for low-income utility consumers should be granted because the George Wiley Center is able to bring forward the rights and interests of low-income consumers directly affected by the docket, which interests are not adequately represented by existing parties to the docket, (Rule 1.14(B)(2)) and the George Wiley Center is able to assert the perspectives and concerns of low-income consumers affected by the filings and the inclusion of a voice for low-income consumers in this proceeding is in the public interest (Rule 1.14(B)(3)).

WHEREFORE, the George Wiley Center, through its counsel the R.I. Center for Justice, requests that the Commission grant its Motion to Intervene in Docket 4978, that it be granted status as a party in this proceeding, and that the Commission grant all other relief it deems meet and just.

Respectfully submitted,



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Dated: August 1, 2022

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2022, I sent a true copy of this document by electronic mail to the parties in the Docket 4978 Service List as of August 1, 2022 and further submitted ten hard copies via regular mail to the Clerk of the Public Utilities Commission.