

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN RE: SERVICE QUALITY PLAN
THE NARRAGANSETT ELECTRIC
COMPANY D/B/A RHODE ISLAND ENERGY'S DOCKET NO. 3628
PROPOSED REVISIONS TO THE SERVICE
QUALITY PLAN**

**MOTION TO INTERVENE OF THE GEORGE
WILEY CENTER RELATING TO THE
PROPOSED REVISIONS TO THE SERVICE
QUALITY PLAN IN COMPLIANCE WITH THE
RHODE ISLAND PUBLIC UTILITIES
COMMISSION'S SEPTEMBER 27, 2023 OPEN
MEETING MOTIONS AND VOTES APPROVING
WITH CONDITIONS THE COMPANY'S
ADVANCED METERING FUNCTIONALITY
("AMF") BUSINESS CASE ISSUED IN DOCKET
NO. 22-49-EL**

The George Wiley Center hereby moves, through counsel the Rhode Island Center for Justice, 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 ("PUC" or "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:

The George Wiley Center is an Appropriate Intervenor in this Docket

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, and in particular low-income utility 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):
 - a. 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:
 - b. A right conferred by statute.
 - c. 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.)
 - d. 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)).

The George Wiley Center has a Direct Interest in this Docket, Has Historically Participated in Related Dockets to Assert that Direct Interest, and Participation by the George Wiley Center is in the Public Interest

5. The George Wiley Center advocates for and works with low-income consumers, all of whom will be directly affected by the costs and benefits of advanced metering. The instant docket will examine the proposed revisions to the service quality plan submitted by Rhode Island Energy (“the Company”) in compliance with the Rhode Island Public Utilities Commission’s September 27, 2023 Open Meeting motions and votes approving with conditions the Company’s Advanced Metering Functionality (“AMF”) Business Case issued in Docket No. 22-49-EL. The George Wiley Center, through its counsel, intervened in and participated actively in the proceedings reviewing the Company’s Advanced Metering Functionality (“AMF”) Business Case in Docket No. 22-49-EL.

6. Through its counsel, the George Wiley Center facilitates legal representation for low-income consumers seeking to protect their rights as consumers under the law. The George Wiley Center also 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.
7. The economic impact on all customers, including particularly low-income customers, potential for cost savings through the use of advanced metering, balanced against the costs of implementing advanced metering, and sustainable access to affordable utility service are central considerations in the PUC's review of the Company's proposed revisions to the Service Quality Plan as it relates to the implementation of advanced metering. 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.
8. The George Wiley Center has participated through its counsel without objection in a wide array of previous PUC Dockets including Dockets 4600, 4651, 4770, 4780, 4890, 4678, 4978, 5022, 22-08-GE, 22-07-GE, 22-49-EL, and 23-01. The George Wiley Center, through its counsel, has prioritized participating in rate setting dockets and other dockets that examine the financial impact of utility business proposals on all consumers, and particularly low-income consumers. The George Wiley Center has done so without objection in several rate dockets and other economic impact dockets in recent years due to its unique ability to reflect the lived experiences and economic circumstances of low-income utility customers. The instant docket involves the standards or targets that the Company will meet to justify and demonstrate the costs and benefits for new metering technologies by examining the Company's proposed Service Quality Adjustments

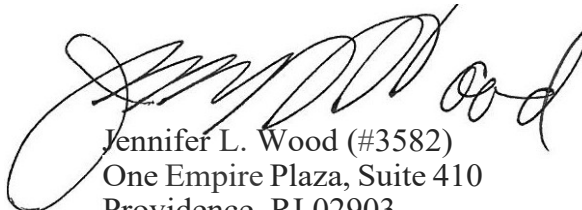
relating to (1) Meter Reading & Billing Service Quality Adjustment (“SQA”); (2) Trouble, Non-Outage SQA; (3) Network Speed SQA; (4) Faster Outage Notification SQA; and (5) Customer Satisfaction SQA. These Service Quality Adjustments directly relate to the costs and benefits that customers will experience as a result of the implementation of Advanced Metering Functionality that was reviewed and conditionally approved by the PUC in Docket 22-49-EL. The SQA’s to be reviewed in this docket have a direct impact on the future costs and benefits of utility service for all consumers and, predictably, a disproportionate impact on low-income consumers who are least able to sustain cost increases and have unique interests in the kinds of cost savings associated with time varying rates and efficiency programs that may be achievable through the most effective and efficient implementation of advanced metering.

9. In 2018, the PUC approved an Amended Settlement Agreement (ASA) in Dockets 4770 and 4780. The George Wiley Center, like other proposed intervenors in this docket, was an intervenor in those proceedings and a party to the ASA.
10. Between August 2018 and January 2021, the George Wiley Center, like other proposed intervenors in this docket, participated extensively in stakeholder meetings regarding Advanced Metering Functionality (AMF) business case and Grid Modernization Plan (GMP), both of which are components of the ASA.
11. On November 18, 2022, petitioner Rhode Island Energy, filed an updated AMF business case with the PUC including a detailed proposal for full-scale deployment of AMF across its electric service territory in Rhode Island (Docket 22-49-EL) in which the George Wiley Center was a participating intervenor.

12. The PUC has now opened the current proceedings as an outgrowth of the deliberations and orders in Docket 22-49-EL.
13. The George Wiley Center's participation in this docket (3628) as an advocate for low-income utility consumers should be granted because (1) the George Wiley Center has been an active participant in the advanced metering deliberations flowing from Dockets 4770, 4780 and 22-49-EL in which the George Wiley Center is a party; (2) the George Wiley Center is able to bring forward the rights and interests of low-income consumers directly affected by this docket, which interests are not adequately represented by existing parties to the docket, (Rule 1.14(B)(2)); and (3) 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)). The George Wiley Center's intervention is necessary and appropriate under both Rule 1.14(B)(2) and Rule 1.14(B)(3) of the Commission's Rules of Practice and Procedure.

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 3628, 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: February 28, 2024

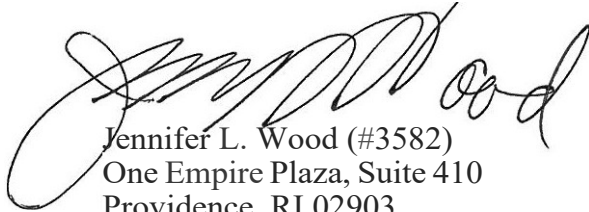
CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2024, I sent a true copy of this document by electronic mail to the parties in the Docket Service List as of February 28, 2024. Hard copies will be served via regular mail to the Clerk of the Public Utilities Commission.

NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.5 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, please enter my appearance on behalf of the George Wiley Center, in the above-captioned proceeding.

Respectfully submitted,



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