

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

In re: Investigation of Misconduct by The Narragansett Electric Company Relating to Past Payments of Energy Efficiency Program Shareholder Incentives	) ) ) ) ) )	Docket No. 22-05-EE Docket No. 5189
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**MOTION TO INTERVENE OF NATIONAL GRID USA**

National Grid USA (“National Grid”) hereby respectfully requests, pursuant to the Notice of Participation/Intervention in the above-referenced dockets and Rule 1.14 of the Public Utilities Commission’s (“PUC” or the “Commission”) Rules of Practice and Procedure, 810-RICR-00-00-1.14, that the Commission grant National Grid’s intervention in the above-referenced dockets. As set forth in this motion, National Grid’s intervention in the Investigation of Utility Misconduct or Fraud by The Narragansett Electric Company (“Narragansett”) Relating to Past Payment of Shareholder Incentive opened by the Commission in the above-referenced dockets (the “Proceeding”) is in the public interest. National Grid’s interest is not adequately represented by any existing parties to the Proceeding.

**I. LEGAL STANDARD**

Rule 1.14 of the PUC’s Rules of Practice and Procedure sets forth the basis for intervention in Commission proceedings. To intervene in a proceeding before the PUC, Rule 1.14(B) provides that the moving party must demonstrate one of the following rights to intervene or an interest of such nature that intervention is necessary:

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.

## **II. DISCUSSION**

Pursuant to the Order issued on July 11, 2022 in the Proceeding (the "Order"), "the Commission will investigate Narragansett's actions and the actions of its employees during the time it was a National Grid affiliate, relating to the alleged manipulation of the reporting of invoices affecting the calculation of past energy efficiency shareholder incentives and the resulting impact on customers. Order at 5-6. National Grid's sale of Narragansett to PPL Rhode Island Holdings, LLC closed on May 25, 2022. As a result, National Grid no longer owns and operates a gas or electric distribution company in Rhode Island and therefore is no longer subject to the Commission's jurisdiction. However, National Grid owned and operated Narragansett at the time of the conduct referenced in the Order and the Proceeding involves current and former employees of National Grid's affiliate, National Grid USA Service Company, Inc. In addition, National Grid possesses information that will be germane to the issues under investigation and, therefore, National Grid USA's participation will assist in assuring an efficient administrative process to conduct the investigation.

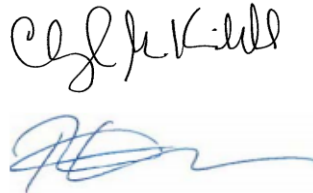
Accordingly, National Grid's participation in this Proceeding as an intervenor is in the public interest and National Grid is not adequately represented by existing parties to the proceeding.

## **III. CONCLUSION**

For the foregoing reasons, National Grid hereby respectfully requests that the Commission grant its motion to intervene in this proceeding as a full party.

Respectfully submitted,

**NATIONAL GRID USA,**  
By its attorneys,



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Dated: July 14, 2022