



## II. Basis for Intervention

Through this docket, The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), submitted a tariff advice pursuant to 810-RICR-00-00-1.10(c) seeking to establish new temporary tariffs to provide a bill credit to all of the Company’s electric and gas distribution customers as agreed upon in a settlement agreement dated May 19, 2022 by and among PPL Corporation, PPL Rhode Island Holdings, LLC (collectively, “PPL”), and the Attorney General (the “Settlement Agreement”). As part of the Settlement Agreement, PPL committed to the following:

Within 60 days of closing [on PPL’s purchase of the Company], PPL shall provide a credit to all of [the Company’s] electric and gas distribution customers in the total amount of \$50 million. Based on the relative number of electric distribution customers and gas distribution customers, PPL will credit \$32.5 million to electric customers and \$17.5 million to gas customers. Each electric customer will receive the same credit, and each gas customer will receive the same credit.

*See Settlement Agreement* at Exhibit C, (1)(a). Accordingly, PPL-owned Rhode Island Energy has sought Commission approval for “(1) a temporary tariff providing a one-time bill credit of \$63.72 to be applied to each electric distribution customer account in all rate classes on the first bill after the effective date of the tariff, and (2) a revision to the gas tariff that creates a temporary section providing a one-time bill credit of \$64.15 to be applied to each gas distribution customer account in all rate classes on the first bill after the effective date of the tariff.” *See Tariff Advice Filing Transmittal* (June 24, 2022), Commission Docket 22-07-GE.

The Rhode Island Attorney General intervenes to represent its own interest in ensuring that the \$50 million secured in the Settlement Agreement are received by the ratepayers as intended by the Attorney General at the time the agreement with PPL was made. Additionally, the Attorney

General seeks to represent the interests of the ratepayers and the public as a whole. He is in a unique position to represent these interests and should be permitted to do so. Participation by the Attorney General in the instant proceeding is sanctioned by law and consistent with the public interest.

The Attorney General is, pursuant to § 42-9-6 of the General Laws of Rhode Island of 1956, as amended, the “legal advisor of all state boards, divisions, departments, and commissions and the officers thereof....” He is also the public officer charged with representing the State of Rhode Island, the public interest, and the people of the State. This includes representation with respect to environmental, electric or gas industry matters, as well as consumer protection matters. Additionally, the Attorney General “has a common law duty to protect the public interest.” State v. Lead Indus., Ass'n, Inc., 951 A.2d 428, 471 (R.I. 2008) (*quoting* Newport Realty, Inc. v. Lynch, 878 A.2d 1021, 1032 (R.I. 2005)).

It should also be noted that the Attorney General has been granted full-party status in prior proceedings before the Public Utilities Commission involving public utility operations and rates. Moreover, the legislature and courts have recognized role of the Attorney General as an intervenor on behalf of the state or its citizens as customers of the public utility. *See e.g.* R.I. Gen. Laws § 39-1-19(b), *see also* Narragansett Elec. Co. v. Harsch, 117 R.I. 395, 405 n. 6 (1977).

The bill credits that the Company seeks to provide in accordance with the Settlement Agreement represent monies secured for ratepayers to compensate for certain potential costs of the transition of the Company’s ownership from National Grid USA to PPL. The Attorney General seeks to intervene to ensure that the bill credits from the Settlement Agreement are received by ratepayers and that the value of those bill credits is preserved through whatever mechanism the Commission may deem appropriate. Additionally, the Attorney General wishes to represent his general interests as a party to the Settlement Agreement.

### III. Conclusion

For the reasons set forth herein, the Attorney General respectfully requests that the Public Utilities Commission grant his Motion to Intervene in this proceeding.

Respectfully submitted,

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ATTORNEY GENERAL OF THE  
STATE OF RHODE ISLAND

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Dated: July 18, 2022

### CERTIFICATE OF SERVICE

I hereby certify that on the 18<sup>th</sup> day of July 2022, the original and four hard copies of this Motion were sent via in hand-delivery to Luly Massaro, Clerk of the Division of Public Utilities and Carriers, 89 Jefferson Boulevard, Warwick, RI 02888. In addition, electronic copies of the Motion were served via electronic mail on the service list for this Docket on July 18, 2022.

/s/ Ellen Golde