

II. Basis for Intervention

In this docket, The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), petitioned the Commission for approval of its annual Distribution Adjustment Charge filing as presented in the Company’s September 1, 2022 Supplemental Filing.

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. The proposed rates represent a significant rate increase for Rhode Islanders. The average annual bill is set to increase by \$151.25, or 10%, over last year as a result of the proposed Distribution Adjustment Charge. *See Testimony of Peter R. Blazunas at 8-9: 16-20, 1-2.* This is a large portion of the overall increase in natural gas prices sought in the Company’s Gas Cost Recovery filing (being considered in Commission Docket 22-20-NG). 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 Attorney General seeks to intervene to ensure that these proposed rates are fully vetted and that any potential means of providing relief for ratepayers facing these significant increases are carefully considered.

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,

PETER F. NERONHA
ATTORNEY GENERAL OF THE
STATE OF RHODE ISLAND

By his Attorney,

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Dated: September 15, 2022

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of September 2022, the original and nine 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 this date.

/s/ Ellen Golde