



DESAUTEL LAW

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October 17, 2022

VIA USPS AND ELECTRONIC MAIL

Ms. Luly Massaro  
Rhode Island Public Utilities Commission  
98 Jefferson Boulevard  
Warwick, RI 02888  
[Luly.massaro@puc.ri.gov](mailto:Luly.massaro@puc.ri.gov)

**RE: Docket No. 22-33-EE – The Narragansett Electric Co. d/b/a Rhode Island Energy  
Annual Energy Efficiency Plan for 2023**

Dear Ms. Massaro:

Enclosed herewith please find an original and nine (9) copies of the Rhode Island Energy Efficiency and Resource Management Council's Motion to Intervene to be filed in the above-entitled matter.

Please be advised that an electronic copy of this document has been sent to the Service List. Thank you for your attention to this matter.

Sincerely,

Marisa Desautel, Esq.

Enclosures

cc: Service List (Electronic Only)

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**

**IN RE: The Narragansett Electric Co. d/b/a Rhode Island Energy      Docket No. 22-33-EE  
Annual Energy Efficiency Plan for 2023**

**THE RHODE ISLAND ENERGY EFFICIENCY  
AND RESOURCE MANAGEMENT COUNCIL'S MOTION TO INTERVENE**

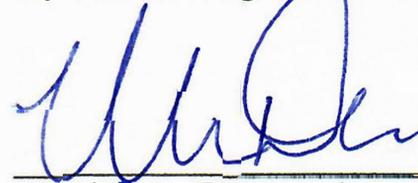
NOW COMES the Rhode Island Energy Efficiency and Resource Management Council (“EERMC”), and by and through its undersigned counsel, hereby moves to intervene in the above-captioned proceeding pursuant to Rule 1.14(a) and (b) of the Rhode Island Public Utilities Commission (“PUC”) Rules of Practice and Procedure (“PUC Rules”). In support of its Motion, EERMC avers:

1. Rule 1.14(a) of the PUC Rules states that “[p]articipation in a proceeding as an intervenor may be initiated by order of the Commission upon a motion to intervene.”
2. The EERMC maintains an interest of such nature that its participation may be in the public interest, as outlined in RIGL §39-1-27.7.
3. Rhode Island Energy has indicated that they do not oppose this Motion to Intervene.

WHEREFORE, based on the above statements, the EERMC respectfully requests that the PUC grant the EERMC’s Motion to Intervene in this matter.

Dated: October 17, 2022

Respectfully submitted,  
Energy Efficiency and  
Resource Management Council  
By and through its counsel:



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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I filed an original of the within Motion to Intervene with the RIPUC and sent a true copy, via electronic mail, of the within Motion to the parties listed on the Service List for Docket #22-33-EE on this 17th day of October, 2023.



Marisa Desautel

**VIA FIRST CLASS MAIL:**

[Luly.massaro@puc.ri.gov](mailto:Luly.massaro@puc.ri.gov)

Luly E. Massaro, Commission Clerk  
Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

**VIA ELECTRONIC MAIL:**

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**Service List updated 10/12/2023**