

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION

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IN RE: THE NARRAGANSETT ELECTRIC CO. d/b/a RHODE  
ISLAND ENERGY'S ADVANCED METERING  
FUNCTIONALITY ("AMF") BUSINESS CASE

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Docket No. 22-49-EL

**MOTION TO INTERVENE OF ACADIA CENTER**

By its attorney, Acadia Center hereby moves pursuant to Rule 1.14 of the Rhode Island Public Utilities Commission (Commission) Rules of Practice and Procedure ("Rules") to intervene in the above-captioned proceeding. Acadia Center is a non-profit research and advocacy organization that has been working in the public interest for over 20 years with a long history working on energy and environment issues on behalf of Rhode Islanders, consistent with the meaning of Rule 1.14 (B)(3). Further, Acadia Center will be directly affected by the outcome of this proceeding, and its interests are not adequately represented by existing parties, consistent with the meaning of Rule 1.14(B)(2). Accordingly, Acadia Center respectfully asks the Commission to grant this petition to intervene, and in support of its motion, states:

1. On August 24, 2018, the Public Utilities Commission (PUC or Commission) approved an Amended Settlement Agreement (ASA) in Dockets 4770 and 4780. Acadia Center was an intervenor in those proceedings and a party to the ASA.
2. Between August 2018 and January 2021, Acadia Center participated extensively in meetings with the Narragansett Electric Company (TNEC or the Company), the Division of Public Utilities and Carriers (Division), and other stakeholders to advise TNEC in development of its Advanced Metering Functionality (AMF) business case and Grid Modernization Plan (GMP).

3. On January 21, 2021, pursuant to Article II, Section C.16.a of the ASA, TNEC, while still under National Grid ownership, filed its AMF business case with the PUC, subsequently docketed as Docket 5113.
4. In May 2022, National Grid and PPL Corporation finalized the transaction to transfer ownership of TNEC to PPL Corporation. TNEC now does business as “Rhode Island Energy.”
5. On September 12, 2022, TNEC filed a Notice of Withdrawal pertaining to its earlier AMF Business Case filed in Docket No. 5113
6. On November 18, 2022, petitioner TNEC, now doing business as 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.
7. In response, the PUC opened the current proceedings as Docket 22-49-EL.

#### **About Acadia Center**

8. Acadia Center is a non-profit research and advocacy organization committed to advancing the clean energy future through data-driven research, innovative policies, and market-based solutions. Acadia Center has become a central public interest voice in Rhode Island energy issues, on topics including, but not limited to grid modernization, advanced metering functionality, ratepayer benefits, energy efficiency, natural gas infrastructure, climate planning, electric vehicles, energy storage, distributed generation, and system reliability procurement.

#### **Basis for Intervention: Direct Interest**

9. Rule 1.14(B) of the Commission’s Rules states “subject to the provisions of this part, 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.” Further, Rule 1.14(B)(2) goes on to state that such a right or interest may be 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."

10. Acadia Center's interests are directly affected by the issues in this proceeding and cannot be adequately represented by any other party. Acadia Center's status as a settling party to the ongoing implementation of the settlement in Dockets 4770 and 4780 includes substantial investment of time and other resources related to the business case at issue in this docket. More broadly, Acadia Center's comprehensive efforts to ensure the alignment of utility programs with state policy requirements may all be directly impacted by this proceeding, binding Acadia Center with the decision.
11. Acadia Center has a substantial interest in advancing policies and decisions that achieve the state's greenhouse gas (GHG) emissions reduction targets required by the 2021 Act on Climate law—specifically a 45% reduction below 1990 levels by 2030, 80% below 1990 levels by 2040, and net-zero emissions by 2050. As TNEC will necessarily play a significant role in reducing GHG emissions from energy transmission and distribution networks, this docket also represents a critical opportunity to evaluate whether petitioners' plans will support public health and safety goals, as well as the state's carbon reduction requirements under Rhode Island General Law §42-6.2.

**Basis for Intervention: Public Interest**

12. The Commission's Rule 1.14(B)(3) also states that such a right or interest to intervene may also include "any other interest of such nature that movant's participation may be in the public interest." Acadia Center's staff has a combined several decades of experience on the design and implementation of consumer-friendly and climate conscious policies, energy efficiency, utility innovation, and clean energy technologies. Acadia Center has the capacity and organizational

commitment to advance climate and energy policy in Rhode Island that will further a clean environment and protect ratepayers from incurring unnecessary risk and costs.

13. Acadia Center experts have researched and written extensively about utility policy reforms and investments vital to reducing fossil fuel dependency, including its 2015 resource, “UtilityVision”<sup>1</sup> and 2021 resource, “Reforming Energy System Planning for Equity and Transformation”<sup>2</sup> (RESPECT).

Acadia Center’s breadth of experience in regulatory proceedings across the Northeast is a valuable resource for the public interest of all Rhode Islanders.

14. Acadia Center has also developed expertise relating to Time-Varying Rates (TVR) and Time-of-Use (TOU) rate policy and finds modest alterations to TNEC’s business plans would more quickly deliver direct economic opportunities and benefits to ratepayers, system resiliency and reliability enhancements, and emissions reduction benefits critical to meeting the state’s GHG reduction and Renewable Energy Standard mandates.

15. Accordingly, Acadia 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. Acadia Center respectfully requests the Commission approve its motion to intervene in the above referenced matter.

Service of any correspondence or pleadings in connection with these matters should be directed to:

Henry (Hank) Webster (RI Bar #9540)  
Rhode Island Director & Senior Policy Advocate  
Acadia Center  
144 Westminster St., Suite 203  
Providence, RI 02903  
401.276.0600 ext. 402  
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<sup>1</sup> <https://acadiacenter.org/resource/utilityvision/>

<sup>2</sup> <https://acadiacenter.org/work/respect/>

WHEREFORE, based on the foregoing reasons, ACADIA CENTER asks that the Commission grant its Motion to Intervene.

Respectfully submitted,

ACADIA CENTER

By its attorney,



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Dated: December 30, 2022

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**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 Acadia Center, in the above-captioned proceeding.

Respectfully submitted,



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CERTIFICATE OF SERVICE

Pursuant to Public Utilities Commission Rules 1.8 and 1.6(G), I certify that an electronic copy of the Motion to Intervene and Notice of Appearance of Counsel were served, via electronic mail, to all parties on the service list for this Docket on December 30, 2022.

Respectfully submitted,



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Dated: December 30, 2022