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April 11, 2023

VIA ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. 23-07-EE - System Reliability Procurement and Energy Efficiency and Conservation Procurement
Rhode Island Energy's Motion of Intervention

Dear Ms. Massaro:

Enclosed is Rhode Island Energy's¹ Motion of Intervention in the above-referenced docket.²

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

Andrew S. Marcaccio

Enclosure

cc: Docket No. 23-33-EE Service List

¹ The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy").

² Per a communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by six (6) hard copies filed with the Clerk within 24 hours of the electronic filing.

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

SYSTEM RELIABILITY PROCUREMENT :
AND ENERGY EFFICIENCY : **DOCKET NO. 23-07-EE**
LEAST COST PROCUREMENT STANDARDS :

THE NARRAGANSETT ELECTRIC COMPANY d/b/a RHODE ISLAND ENERGY
MOTION OF INTERVENTION

The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) hereby respectfully requests that the Public Utilities Commission (“Commission”) grant the Company’s intervention in the above referenced docket pursuant to 810-RICR-00-00-1.14. The reasons for intervention are set forth in this motion to intervene (this “Motion”).

INTRODUCTION

1. In accordance with R.I. Gen. Laws § 39-1-27.7, the Commission established Least Cost Procurement (“LCP”) Standards, which are subject to periodic review.
2. Per R.I. Gen. Laws § 39-1-27.7, the LCP Standards are subject to periodic review which is to be conducted not less frequently than every three (3) years.
3. The current LCP Standards were adopted by written order on August 25, 2020, and are subject to review this year.
4. On March 31, 2023, Commission counsel distributed draft revisions as proposed by Commission staff to the LCP Standards.
5. On April 6, 2023, Commission staff conducted a technical session during which the proposed revisions and amendments to the LCP Standards were discussed and a procedural schedule set forth.

6. Per the procedural schedule, the deadline to file for intervention is April 14, 2023 and the deadline to file written comments in response to the proposed revisions to the LCP Standards is April 21, 2023.

7. The Company attended the technical session, desires to intervene in this docket, and anticipates submitting written comments.

LEGAL STANDARD

8. Intervention in Commission proceedings is governed by 810-RICR-00-00-1.14 which provides that “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.” See 810-RICR-00-00-1.14(B).

9. It is appropriate for the Commission to grant a motion to intervene when (1) the right of intervention is conferred by statute; (2) a movant may be bound and its interests may be directly affected by the proceedings, and those interests are not adequately represented by existing parties; or (3) the movant holds an interest of such nature that the movant's participation may be in the public interest. See 810-RICR-00-00-1.14(B)(1) through (3).

ARGUMENT

10. In this case, the Company’s intervention in the above-referenced docket is necessary and appropriate.

11. The Company is seeking intervention pursuant to 810-RICR-00-00-1.14(B)(2) as it may be bound and its interests may be directly affected by the proceedings, and those interests are not adequately represented by existing parties.

12. Per R.I. Gen. Laws § 39-1-27.7(d)(4), the Company is required to submit a plan for system reliability and energy efficiency and conservation procurement every three years, and that plan must include content pursuant to the LCP Standards established by the Commission.

13. In addition to the express statutory requirements pertaining to the three-year plan, the LCP Standards also govern any related annual plans and other potential filings made by the Company related to system reliability and least-cost procurement.

14. Accordingly, the Company will be bound by and its interests will be directly affected by the final version of the LCP Standards.

15. The Company is the State of Rhode Island's largest electrical and natural gas distribution company and its interests are not adequately represented by any other potential party.

CONCLUSION

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

Respectfully submitted,

**The Narragansett Electric Company
d/b/a Rhode Island Energy**
By its attorney,



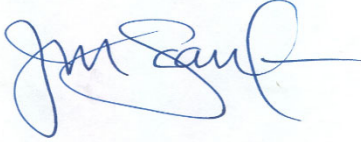
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April 11, 2023

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

April 11, 2023
Date

**Docket No. 22-33-EE – Rhode Island Energy’s Energy Efficiency Plan 2023
Service list updated 10/12/22**

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