

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN RE: THE NARRAGANSETT ELECTRIC
COMPANY D/B/A/ RHODE ISLAND ENERGY'S
RESIDENTIAL ASSISTANCE RECOVERY FILING**

DOCKET NO. 23-17-EL

**MOTION FOR INTERVENTION OF THE GEORGE WILEY CENTER
THROUGH ITS COUNSEL THE RHODE ISLAND CENTER FOR JUSTICE**

The George Wiley Center hereby moves, through counsel the Rhode Island Center for Justice, to intervene in the above-captioned proceeding on behalf of low-income utility consumers pursuant to Rule 1.14 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission ("PUC" or "Commission") (R.I. Code of Regulations, Title 810, Chapter 00, Subchapter 00, Part 1, Section 1.14). In support of this motion, the George Wiley Center states the following:

The George Wiley Center is an Appropriate Intervenor in this Docket

1. The George Wiley Center is a grassroots, community-based organization comprised of low-income consumers and focused on advocacy for social and economic justice in our state. The George Wiley Center works in partnership with its counsel, the R.I. Center for Justice, a nonprofit public interest law center, to provide legal assistance to low-income individuals and families across the State relating to their rights as consumers.
2. The George Wiley Center has been a leading voice advocating for the interests of low-income consumers, and in particular low-income utility consumers, in Rhode Island for more than forty years.
3. Intervention in Commission proceedings is governed by Rule 1.14 of the Commission's Rules of Practice and Procedure, which states at Rule 1.14(B):

- a. Subject to the provisions of these rules, 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. Such right or interest may be:
 - b. A right conferred by statute.
 - c. 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. (The following may have such an interest: consumers served by the applicant, defendant, or respondent; holders of securities of the applicant, defendant, or respondent.)
 - d. Any other interest of such nature that movant's participation may be in the public interest.
4. The Commission rule further provides that “all timely motions to intervene not objected to by any party within ten (10) days of service of the motion for leave to intervene shall be deemed allowed” (Rule 1.14(E)).

The George Wiley Center has a Direct Interest in this Docket, Has Historically Participated in Related Dockets to Assert that Direct Interest, and Participation by the George Wiley Center is in the Public Interest

5. This docket addresses the mechanism through which certain aspects of the costs of the statutorily created Arrearage Management Program (AMP) are accounted for. The Arrearage Management Program (AMP) is a program created to assist low-income consumers who have fallen behind on their bills to reduce arrears when they participate in an AMP payment plan. Through its counsel, the R.I. Center for Justice, the George Wiley Center facilitates legal representation for low-income consumers seeking to protect their rights as consumers under the law and advises consumers on the AMP and other low-income supports and programs. The George Wiley Center conducts meetings and workshops with low-income utility consumers on a regular basis in order to remain fully informed about the lived experience of low-income consumers, particularly as it relates to their challenges in maintaining affordable utility services in the homes they own and rent. These consumers have a direct interest in the sustainability, appropriate oversight

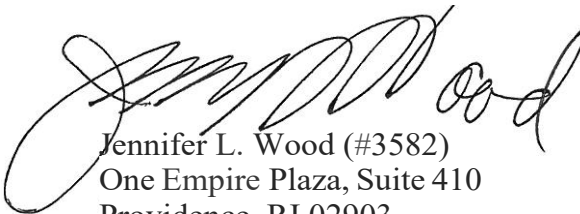
and implementation of the AMP.

6. The economic impact on all customers, including low-income customers, of the AMP and the mechanisms for residential assistance recovery is of direct importance to the low-income consumers who are George Wiley Center members and whom the George Wiley Center works to support. The George Wiley Center is uniquely capable to help to inform issues of economic impact of the residential assistance recovery mechanism and the corollary impact on the sustainability of the AMP on directly affected low-income consumers due to its extensive work with these affected consumers over several decades.
7. The George Wiley Center has participated, through its counsel the R.I. Center for Justice, without objection, in many previous PUC Dockets including, most recently, Dockets 4600, 4651, 4770, 4780, 4890, 4678, 4978, 5022, 22-08-GE and 22-07-GE. The George Wiley Center, through its counsel the R.I. Center for Justice, has prioritized participating in rate setting dockets and other dockets that examine financial impact of utility business proposals on all consumers, and particularly low-income consumers. The George Wiley Center has done so without objection in several rate dockets and other economic impact dockets in recent years due to its unique ability to reflect the lived experiences and economic circumstances of low-income utility customers. The instant docket involves the recovery mechanism for certain aspects of the costs of the AMP and will thus have a direct impact on the future costs of utility service for all residential consumers and, predictably, directly impact low-income consumers who are least able to sustain cost increases and have unique interests in sustainability of the AMP.
8. The intervention of the George Wiley Center in this docket as an advocate for low-income utility consumers should be granted because (1) the George Wiley Center has

been an active participant in multiple related dockets concerning the AMP and cost recovery; (2) the George Wiley Center is able to bring forward the rights and interests of low-income consumers directly affected by the docket, which interests are not adequately represented by existing parties to the docket, (Rule 1.14(B)(2)) and (3) the George Wiley Center is able to assert the perspectives and concerns of low-income consumers affected by the filings and the inclusion of a voice for low-income consumers in this proceeding is in the public interest (Rule 1.14(B)(3)). The George Wiley 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.

WHEREFORE, the George Wiley Center, through its counsel the R.I. Center for Justice, requests that the Commission grant its Motion to Intervene in Docket 23-17-EL, that it be granted status as a party in this proceeding, and that the Commission grant all other relief it deems meet and just.

Respectfully submitted,



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Dated: June 9, 2023

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2023, I sent a true copy of this document by electronic mail to the parties in the Docket Service List as of June 9, 2023. Hard copies will be served via regular mail to the Clerk of the Public Utilities Commission.

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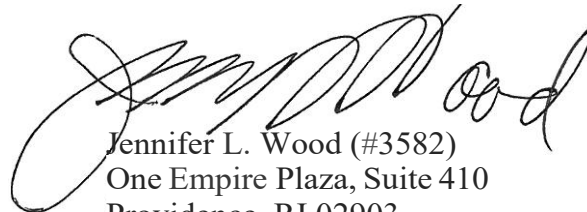
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NOTICE OF APPEARANCE OF COUNSEL

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 the George Wiley Center, in the above-captioned proceeding.

Respectfully submitted,



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