

kWdc / 200 kWac in capacity by the end of 2025) planned and targeted in reliance on the forthcoming REG Program. These facilities each create jobs, pay taxes, support local real estate and contribute to additional electricity supply resulting in lower costs for all ratepayers.

5. Rule 1.14(B)(2) allows intervention for any 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. It specifically notes that “[t]he following may have such an interest: consumers served by the applicant, defendant, or respondent.”
6. Rule 1.14(B)(3) also provides for intervention of “any other interest of such nature that movant's participation may be in the public interest.”
7. Gridwealth’s interest in the value of generation output sold under REG tariffs over the next three program years is directly affected by this proceeding. Among other specific interests, Gridwealth has interest in:
 - a. the tariff classes, sizes and rates proposed by Rhode Island Energy (“RIE”) and the DG Board, which Gridwealth is relying on to model, finance and develop its projects;
 - b. maintaining existing REG program rules that Gridwealth is relying on to plan development of its projects;
 - c. ensuring the proceeding unfolds in a timely manner, as delays in the program approval could cause delays in financialization of Gridwealth’s ongoing projects, which would prevent Gridwealth from financing and installing and meeting targets for projects projected to operate by year-end.
8. Gridwealth’s interests in the REG tariff is not otherwise represented by any other parties. No other renewable energy developer raises or is better positioned to represent Gridwealth’s specific

interests and concerns. No other party shares Gridwealth's commercial interests. Gridwealth has a distinct private interest which the government could have no interest in protecting. State of Maine v. U.S. Fish & Wildlife Service, 262 F.3d 13, 20 (1st Cir. 2001) (citing Cotter v. Mass. Ass'n of Minority Law Enforcement Officers, 219 F.3d 31, 34-37 (1st Cir. 2000), cert. denied, 531 U.S. 1072 (2001)); In re Narragansett Elec. Co. (d/b/a National Grid) Proposed Standard Offer Service Rate Reduction, PUC Docket 3739, Order 18794, 2006 WL 4070740, at 15–16 (R.I. Pub. Utils. Comm'n Dec. 27, 2006).

9. Gridwealth's advocacy in this docket is also in the public interest per rule 1.14(B)(3), in many ways. Advocating that REG tariffs are properly administered and accounted for helps ensure that all participants in this marketplace will be appropriately compensated, fairly treated, and accorded due value for services. That interest accords with:
 - a. the guiding principles adopted by the PUC in docket 4600 (Order 22851, July 31, 2017), as more specifically noted in italics:
 - i. ensuring safe, reliable, affordable, and environmentally responsible electricity service today and in the future.
 - ii. promoting economic efficiency over the short and long term.
 - iii. empowering consumers to manage their costs.
 - iv. ensuring that all parties provide fair compensation for value and services received and receive fair compensation for value and benefits delivered.
 - v. being transparent and understandable to all customers.
 - vi. providing opportunities to reduce energy burden and address low income and vulnerable customers' needs.

- vii. being consistent with policy goals such as environmental protection, addressing climate change and the Resilient Rhode Island Act, energy diversity, competition, innovation, power/data security, and least cost procurement.
 - viii. evaluating rate structures on whether they encourage or discourage appropriate investments that enable the evolution of the future energy system.
 - b. the purpose of Rhode Island's Renewable Energy Growth Program law as set out in § 39-26.6-1:
 - to enable the state to meet its climate and resilience goals, including those established in the act on climate. This includes the goals to facilitate and promote installation of grid-connected generation of renewable energy; support and encourage development of distributed renewable energy generation systems while protecting important core forest areas essential to climate resilience and complying with Rhode Island's climate change mandates; reduce environmental impacts; reduce carbon emissions that contribute to climate change by encouraging the siting of renewable energy projects in the load zone of the electric distribution company and in preferred areas that have already been disturbed by industry or other uses; diversify the energy-generation sources within the load zone of the electric distribution company; stimulate economic development; and improve distribution-system resilience and reliability with the load zone of the electric distribution company.
 - c. Rhode Island's State Energy Plan, Energy 2035, which calls for policies that support development of local distributed generation of renewable energy to enhance energy security and reliability, provide economic benefits like job creation and stable energy pricing, and provide environmental benefits including the reduction of greenhouse gas emissions.

10. Gridwealth attempted to confer with the other current parties about whether they oppose this motion in accordance with Rule 1.16. The Office of Energy Resources has no objection.

Otherwise, Gridwealth has not received any responsive position as of this filing.

11. Please direct service of any correspondence or pleadings in connection with this proceeding to:

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and

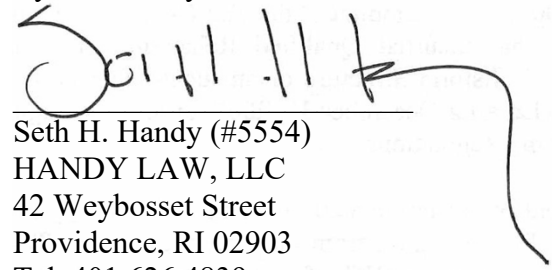
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WHEREFORE, Gridwealth asks that the PUC grant its motion to intervene.

Respectfully submitted,

**MASSAMERICAN ENERGY LLC dba
GRIDWEALTH DEVELOPMENT,**

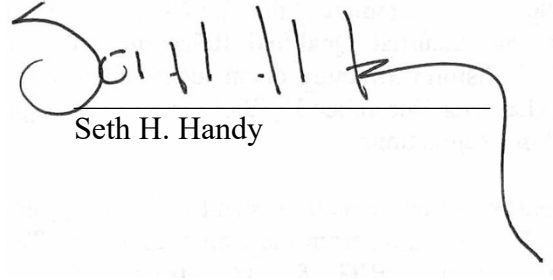
By its attorney,

A handwritten signature in black ink, appearing to read 'Seth H. Handy', is written over a horizontal line. A long, thin arrow-like stroke extends from the right side of the signature down and to the right.

Seth H. Handy (#5554)
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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2024, I sent a true copy of the document by electronic mail to the PUC and the service list and filed the original pleading and 9 photocopies with the PUC.



Seth H. Handy