

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN RE: THE NARRAGANSETT ELECTRIC
CO. D/B/A RHODE ISLAND ENERGY – LAST
RESORT SERVICE RATES FOR RESIDENTIAL
AND COMMERCIAL GROUPS FOR PERIOD
APRIL 2024 - SEPTEMBER 2024 AND INDUSTRIAL
GROUP FOR PERIOD APRIL 2024 - JUNE 2024**

DOCKET 24-04

**MOTION TO INTERVENE OF THE GEORGE
WILEY CENTER RELATING TO THE
PROPOSED LAST RESORT SERVICE RATE FOR
THE PERIOD APRIL 2024 THROUGH
SEPTEMBER 2024**

The George Wiley Center hereby moves, through counsel, to intervene in the above-captioned proceedings 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 ("Commission") (R.I. Code of Regulations, Title 810, Chapter 00, Subchapter 00, Part 1, Section 1.14). This Motion to Intervene relates specifically to the RI Energy filing of Proposed Last Resort Service (LRS) rates for the Residential and Commercial Groups for the period of April 2024 through September 2024; and the Industrial Group for the period of April 2024 through June 2024.

In support of this motion, the George Wiley Center states the following:

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 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):

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:

1. A right conferred by statute.
2. 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.)
3. 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)).

5. The George Wiley Center advocates for and works with low-income consumers, all of whom will be directly affected by the proposed rates in Docket 24-04 which will take effect during the period April to September 2024. Through its counsel, the R.I. Center for Justice, the George Wiley Center also facilitates legal representation for low-income consumers seeking to protect their rights as consumers under the law. 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.

6. Economic impact on all customers, including low-income customers, and sustainable access to affordable utility service are central considerations in the PUC's review of the proposed rates in Docket 24-04, and the George Wiley Center is uniquely capable to help to inform issues of economic impact on directly affected low-income consumers due to its extensive work with

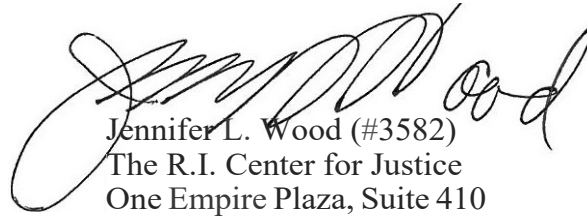
these affected consumers over several decades.

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 4651, 4770, 4780, 4890, 5022,4978 and LRS dockets including 23-01. The George Wiley Center, through its counsel the R.I. Center for Justice, has prioritized participating in rate setting dockets, and has intervened without objection in the 2022 and 2023 rate setting dockets due to its unique ability to reflect the lived experiences and economic circumstances of low- income utility customers.

8. The George Wiley Center's participation in the current filing of LRS rates for the period April through September 2024 as an advocate for low-income utility consumers should be granted because 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 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)).

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 24-04 with regard to the filing of Proposed Last Resort Service rates for the Residential and Commercial Groups for the period April through September 2024; and the Industrial Group for the period April through June 2024, 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: February 28, 2024

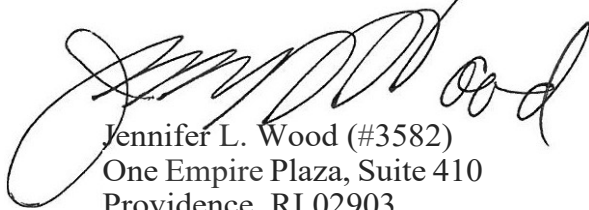
CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2024, I sent a true copy of this document by electronic mail to the parties in the Docket 24-04 Service List as of February 28, 2024 and will submit hard copies via regular mail to the Clerk of the Public Utilities Commission.

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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