



Jonathan Bell  
[bellj@gtlaw.com](mailto:bellj@gtlaw.com)  
617-310-6038

March 4, 2024

**VIA USPS AND ELECTRONIC MAIL**

Luly Massaro  
RI Public Utilities Commissioner Clerk  
89 Jefferson Boulevard  
Warwick, RI 02999

RE: Docket No. 24-06-EE- The Narragansett Electric Company's D/B/A Rhode Island Energy's System Reliability Procurement Investment Proposal for Electric Demand Response 2024-2026

Dear Ms. Massaro,

Enclosed herein please find an original and nine (9) copies of CPower's Motion to Intervene in the above referenced docket. Electronic copy of this document has been sent to the Service List.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Bell".

Jonathan Bell

## STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

**IN RE: The Narragansett Electric Co:  
D/B/A RI Energy's System Reliability:  
Procurement Investment Proposal:**

**Docket No. 24-06-EE**

### **CPOWER'S MOTION TO INTERVENE**

Enerwise Global Technologies, LLC d/b/a CPower ("CPower"), by its attorney, hereby moves, pursuant to Rule 1.14 of the Rhode Island Public Utilities Commission ("Commission) Rules of Practice and Procedure, to intervene in the above-captioned proceeding. In support of its motion, CPower states:

1. CPower is a leading provider of distributed energy resource (DER) and load management services in Rhode Island and throughout the United States. More specifically, CPower helps customers optimize storage, demand response, and energy efficiency assets in wholesale electricity markets and state programs, including the ConnectedSolutions Program in Rhode Island. As a curtailment service provider in ConnectedSolutions, CPower enables customers to provide load reductions to the system; these load reductions benefit all ratepayers in Rhode Island by lowering costs, improving reliability, and reducing emissions.
2. On March 8, 2024, The Narragansett Electric Co d/b/a RI Energy's System Reliability ("RIE") submitted its System Reliability Procurement Investment Proposal for Electric Demand Response 2024-2026 – Connected Solutions ("SRP Investment Proposal) to the Commission. RIE proposes several material changes to the ConnectedSolutions Program in the SRP Investment Proposal.
3. CPower moves to intervene pursuant to Sections 1.14B(2) and 1.14B(3) of the Commission's Rules of Practice and Procedure.
4. Rule 1.14(B) states 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". Rule 1.14(B)2 specifies that such 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." Rule 1.14(B)3 specifies that such

right or interest may also be, “Any other interest of such nature that movant’s participation may be in the public interest.”

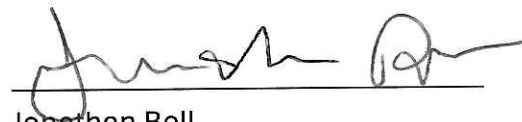
5. Consistent with Rule 1.14(B)2, CPower will be directly affected by the outcome of this proceeding because the proposed changes to the ConnectedSolutions Program will affect its ability to provide load reductions that create benefits for Rhode Island ratepayers. Further, CPower’s interests are not adequately represented by existing parties, consistent with the meaning of Rule 1.14(B)2.
6. Consistent with Rule 1.14(B)3, allowing CPower to intervene in the above-captioned proceeding is in the public interest because it will enable CPower to provide information to the Commission on how to maximize ratepayer benefits from the ConnectedSolutions Program.

Based on the foregoing, CPower respectfully requests intervenor status in the above-captioned proceeding and asks that the individual below be added to the service list

Nancy Chafetz  
[Nancy.Chafetz@CPowerEnergy.com](mailto:Nancy.Chafetz@CPowerEnergy.com)  
Senior Director, Regulatory Affairs  
CPower  
1001 Fleet St, #400  
Baltimore, MD 21202

Dated: March 4, 2024

Respectfully submitted:



Jonathan Bell  
Rhode Island Bar #3846  
Greenberg Traurig LLP  
One International Place, 20<sup>th</sup> Floor  
Boston, Massachusetts 02110  
617-310-6038  
[bellj@gtlaw.com](mailto:bellj@gtlaw.com)

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that an original and nine (9) copies of CPower's Motion to Intervene were mailed to the Commission for filing, and a true copy of the Intervention was served via electronic mail upon all parties set forth in the attached Service List on the 4th day of March, 2024.



Jonathan Bell  
Rhode Island Bar #3846  
Greenberg Traurig LLP  
One International Place, 20<sup>th</sup> Floor  
Boston, Massachusetts 02110  
617-310-6038  
[bellj@gtlaw.com](mailto:bellj@gtlaw.com)

VIA FIRST CLASS MAIL

Luly Massaro  
Commission Clerk  
89 Jefferson Blvd  
Warwick, RI 02888

VIA ELECTRONIC MAIL

[Luly.Massaro@PUC.RI.GOV](mailto:Luly.Massaro@PUC.RI.GOV)  
Service List