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February 27, 2024

VIA USPS AND ELECTRONIC MAIL

Luly Massaro
RI Public Utilities Commission Clerk
89 Jefferson Boulevard
Warwick, RI 02888

**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 herewith please find an original and nine (9) copies of the Rhode Island Energy Efficiency and Resource Management Council's Motion to Intervene to be filed in the above-entitled matter.

Please be advised that an electronic copy of this document has been sent to the Service List. Thank you for your attention to this matter.

Sincerely,

Marisa A. Desautel, Esq.

Enclosures

cc: Service List (Electronic Only)

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

**STATE OF RI ENERGY EFFICIENCY & RESOURCE MANAGEMENT COUNCIL'S
MOTION TO INTERVENE**

NOW COMES the State of Rhode Island Energy Efficiency and Resource Management Council ("EERMC"), by and through its undersigned counsel, and hereby moves the Public Utilities Commission ("PUC" or "Commission") to allow the EERMC to intervene in the above-captioned proceeding. Pursuant to Rule 1.14 of the Commission's Rules of Practice and Procedure ("Rules"), and in support of its Motion, the Town asserts that:

1. Rule 1.14(a) of the PUC Rules states that "[p]articipation in a proceeding as an intervenor may be initiated by order of the Commission upon a motion to intervene."
2. The EERMC maintains an interest of such nature that its participation may be in the public interest, as outlined in RIGL §39-1-27.7.

WHEREFORE, based on the above statements, the EERMC respectfully requests that the PUC grant the EERMC 's Motion to Intervene in this matter.

Dated: February 27, 2024

Respectfully submitted:



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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that an original and nine (9) copies of the within RI Energy Efficiency and Resource Management Council’s Motion to Intervene was mailed to PUC for filing, and a true copy of the within was served via electronic mail upon all parties set forth in the attached Service List on the 27th day of February, 2024.

/s/ Samuel Gilman

VIA FIRST CLASS MAIL:

Luly Massaro
Commission Clerk
89 Jefferson BLVD
Warwick, RI 02888

Luly.massaro@puc.ri.gov

VIA ELECTRONIC MAIL:

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Service List