



STATE OF RHODE ISLAND  
OFFICE OF THE ATTORNEY GENERAL

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*Peter F. Neronha*  
*Attorney General*

March 4, 2024

Luly Massaro, Clerk  
Division of Public Utilities and Carriers  
89 Jefferson Blvd.  
Warwick, RI 02888  
[Luly.massaro@puc.ri.gov](mailto:Luly.massaro@puc.ri.gov)

**RE: Docket No. 24-06-EE – The Narragansett Electric Company d/b/a Rhode Island Energy’s System Reliability Procurement Investment Proposal for Electric Demand Response 2024-2026**

Dear Ms. Massaro:

Enclosed please find for filing an original and nine (9) copies of the Attorney General’s Motion to Intervene in the above-referenced docket.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Nicholas Vaz*

Special Assistant Attorney General  
[nvaz@riag.ri.gov](mailto:nvaz@riag.ri.gov)

Enclosures

Copy to: Service List

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: THE NARRAGANSETT ELECTRIC :  
COMPANY D/B/A RHODE ISLAND ENERGY'S : DOCKET NO. 24-06-EE  
SYSTEM RELIABILITY PROCUREMENT :  
INVESTMENT PROPOSAL FOR ELECTRIC :  
DEMAND RESPONSE 2024-2026 :**

**THE ATTORNEY GENERAL OF THE STATE OF RHODE ISLAND'S  
MOTION TO INTERVENE**

**NOW COMES** Peter F. Neronha, Attorney General of the State of Rhode Island (“Attorney General”), and hereby moves to intervene with full-party status in the above-captioned proceeding in accordance with Rule 1.14(B) of the Public Utilities Commission’s (the “Commission”) Rules of Practice and Procedure (the “Commission Rules”).

**I. Standard of Review**

Commission 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.” 810-RICR-00-00-1.14(B). Further, such right or interest may be:

- a. A right conferred by statute.
- b. 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.)
- c. Any other interest of such a nature that movant’s participation may be in the public interest.

810-RICR-00-00-1.14(B)(1)-(3). As explained below, the Attorney General has a statutory right to intervene and is in a unique position to represent the interests of the State and the public such that intervention is both necessary and appropriate.

## II. Basis for Intervention

In this docket, The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”), has filed its System Reliability Procurement Investment Proposal for Electric Demand Response for the years 2024-2026 and has requested approval pursuant to R.I. Gen. Laws § 39-1-27.7 and Chapter 5 of the Least Cost Procurement Standards. The total projected programmatic budget for the Company’s demand response program (“ConnectedSolutions”), including proposed administrative funding to the Office of Energy Resources and Energy Efficiency and Resources Management Council and a performance incentive to be earned by the Company, is \$9.8 Million for 2024, \$10.5 Million for 2025, and \$11.6 Million for 2026.

The Attorney General seeks to represent the interests of the ratepayers and the public as a whole. He is in a unique position to represent these interests and should be permitted to do so. The Attorney General is, pursuant to § 42-9-6 of the General Laws of Rhode Island of 1956, as amended, the “legal advisor of all state boards, divisions, departments, and commissions and the officers thereof....” He is also the public officer charged with representing the State of Rhode Island, the public interest, and the people of the State. This includes representation with respect to environmental, electric or gas industry matters, as well as consumer protection matters. Additionally, the Attorney General “has a common law duty to protect the public interest.” *State v. Lead Indus., Ass'n, Inc.*, 951 A.2d 428, 471 (R.I. 2008) (quoting *Newport Realty, Inc. v. Lynch*, 878 A.2d 1021, 1032 (R.I. 2005)).

It should also be noted that the Attorney General has been granted full-party status in prior proceedings before the Public Utilities Commission involving public utility operations and rates. Moreover, the legislature and courts have recognized role of the Attorney General as an intervenor

on behalf of the state or its citizens as customers of the public utility. *See e.g.* R.I. Gen. Laws § 39-1-19(b), *see also Narragansett Elec. Co. v. Harsch*, 117 R.I. 395, 405 n. 6 (1977).

Participation by the Attorney General in the instant proceeding is sanctioned by law and consistent with the public interest. The Attorney General seeks to intervene to ensure that the Company's proposal is thoroughly vetted and considers the needs to appropriately achieve reliable service, controlled costs to ratepayers, and all other goals of the demand response program, while aiding Rhode Island in achieving the 2021 Act on Climate's mandated greenhouse gas reductions. Additionally, the Attorney General has conferred with the Company and the Company has indicated that it does not object to the Attorney General's intervention as a full party in this docket.

### **III. Conclusion**

For the reasons set forth herein, the Attorney General respectfully requests that the Public Utilities Commission grant his Motion to Intervene in this proceeding.

Respectfully submitted,

PETER F. NERONHA  
ATTORNEY GENERAL OF THE  
STATE OF RHODE ISLAND

By his Attorneys,

/s/ Nicholas M. Vaz  
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Dated: March 4, 2024

CERTIFICATE OF SERVICE

I hereby certify that on the 4<sup>th</sup> day of March 2024, the original and nine hard copies of this Motion were sent via in hand-delivery to Luly Massaro, Clerk of the Division of Public Utilities and Carriers, 89 Jefferson Boulevard, Warwick, RI 02888. In addition, electronic copies of the Motion were served via electronic mail on the service list for this Docket on March 4, 2024.

/s/ Nicholas M. Vaz