

Marisa A. Desautel <u>marisa@desautelbrowning.com</u> 401.477.0023

April 4,2024

VIA USPS AND ELECTRONIC MAIL

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

RE: Docket No. 23-47-EE - The Narragansett Electric Company's d/b/a Rhode Island Energy's 2024-2026 System Reliability Procurement (SRP) Three Year Plan

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)

38 Bellevue Avenue, Suite B Newport, Rhode Island 02840 401.477.0023

STATE OF RHODE ISLAND PUBLIC UTILITIES COMISSION

IN RE: THE NARRAGANSETT ELECTRIC CO. D/B/A: RI ENERGY'S 2024-2026 SYSTEM RELIABILITY : PROCUREMENT (SRP) THREE YEAR PLAN :

Docket No. 23-47-EE

<u>STATE OF RI ENERGY EFFICIENCY & RESOURCE MANAGEMENT COUNCIL'S</u> <u>MOTION TO INTERVENE</u>

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 abovecaptioned 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:

- 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: April 4, 2024

Respectfully submitted:

Marisa A. Desautel, Esq. Desautel Browning Law 38 Bellevue Ave., Unit B Newport, RI 02840 Tel. (401) 477-002 marisa@desautelbrowning.com

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 4th day of April, 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:

Luly.massaro@puc.ri.gov

Service List