



Commission's action in the proceeding. It specifically notes that “[t]he following may have such an interest: consumers served by the applicant, defendant, or respondent. . .”

5. Rule 1.14(B)(3) also provides for intervention of “any other interest of such nature that movant's participation may be in the public interest.”
6. Gridwealth’s interest in the tariff implementing the 2023 legislative changes to net metering is directly affected by this proceeding. Among other specific interests, Gridwealth has interest in:
  - a. Clarity regarding tariff implementation of all of the amendments;
  - b. The means of getting DEM approval of a Core Forest designation per § 39-26.4-2(2) as amended and how that will coincide with RIE’s interconnection process;
  - c. How RIE proposes to implement section § 39-26.4-2(6) as amended regarding termination of net metering eligibility for system not interconnected behind the same meter as the net-metering customer’s load effective July 1, 2060;
  - d. Tariff implementation of this language in § 39-26.4-2(22)(iv) as amended “For projects after April 15, 2023, subject to the allowable two hundred seventy-five megawatts alternating current (275MWac), under § 39-26.4-3(a)(1)(vi), the credit shall be reduced by twenty percent (20%).” More specifically,
    - i. what is meant by “after April 15, 2023” and how will that benchmark be defined by the tariff; and
    - ii. what is meant “by subject to the allowable two hundred seventy-five megawatts alternating current (275MWac)” –are projects that are not subject to the cap not subject to this rate decrease?
  - e. The significance of the following language in the Tariff definition of Renewable Net Metering Finance Agreement” –

For purposes of entering into a Public Entity Net Metering Financing Arrangement as defined in R.I. Gen. Laws § 39-26.4-2(16)(i) (Net Metering Act), the requirement that an Eligible Net Metering Resource be located on property owned or controlled by a Public Entity, Educational Institution, Hospital, Municipality, Multi-Municipal Collaborative, or Commercial or Industrial Customer is satisfied by showing documentation of ownership or, for control, granting an irrevocable license or sublicense to the Eligible Net Metering Customer or equivalent.

- i. Is an “irrevocable license or sublicense” proposed to be the only way to satisfy that requirement or do the prior PUC rulings authorizing other instruments still stand as well?
  - ii. What provision of the legislation prompts this tariff amendment?
- f. In light of the General Assembly’s definition of “Preferred Site” to include “parking lots or sites that are designated appropriate for carpools,” what is the process for determining whether a site is “designated appropriate for carpools?”
7. Gridwealth’s interests in the tariff implementation of these legislative changes are not otherwise represented by any other parties. No other existing party raises Gridwealth’s specific interests/concerns. No other party shares Gridwealth’s commercial interests. Gridwealth has a distinct private interest which the government could have no interest in protecting. State of Maine v. U.S. Fish & Wildlife Service, 262 F.3d 13, 20 (1st Cir. 2001) (citing Cotter v. Mass. Ass'n of Minority Law Enforcement Officers, 219 F.3d 31, 34-37 (1st Cir. 2000), cert. denied, 531 U.S. 1072 (2001)); In re Narragansett Elec. Co. (d/b/a National Grid) Proposed Standard Offer Service Rate Reduction, PUC Docket 3739, Order 18794, 2006 WL 4070740, at 15–16 (R.I. Pub. Utils. Comm’n Dec. 27, 2006).
8. Gridwealth’s advocacy in this docket is also in the public interest per rule 1.14(B)(3), in many ways. Advocating that net metering is properly administered according to legislative language accords with:

a. the guiding principles adopted by the PUC in docket 4600 (Order 22851, July 31, 2017), as more specifically noted in italics:

- i. ensuring safe, reliable, affordable, and environmentally responsible electricity service today and in the future;
- ii. promoting economic efficiency over the short and long term;
- iii. providing efficient price signals that reflect long-run marginal cost;
- iv. identifying future rates and rate structures that appropriately address “externalities” that are not adequately counted in current rate structures;
- v. empowering consumers to manage their costs;
- vi. ensuring that all parties provide fair compensation for value and services received and receive fair compensation for value and benefits delivered;
- vii. being transparent and understandable to all customers;
- viii. providing opportunities to reduce energy burden and address low income and vulnerable customers’ needs;
- ix. being consistent with policy goals such as environmental protection, addressing climate change and the Resilient Rhode Island Act, energy diversity, competition, innovation, power/data security, and least cost procurement;
- x. evaluating rate structures on whether they encourage or discourage appropriate investments that enable the evolution of the future energy system;

b. the purpose of Rhode Island’s net metering law as set out in § 39-26.4-1.

this chapter is to facilitate and promote installation of customer-sited, grid-connected generation of renewable energy; to support and encourage customer development of renewable generation systems; to reduce environmental impacts; to reduce carbon

emissions that contribute to climate change by encouraging the local siting of renewable energy projects; to diversify the state's energy generation sources; to stimulate economic development; to improve distribution system resilience and reliability; and to reduce distribution system costs.

- c. Rhode Island's State Energy Plan, Energy 2035, which calls for policies that support development of local distributed generation of renewable energy to enhance energy security and reliability, provide economic benefits like job creation and stable energy pricing, and provide environmental benefits including the reduction of greenhouse gas emissions.

9. Precedent supports the allowance of Gridwealth's intervention in this proceeding. In prior proceedings to amend the net metering tariff developers relying on the net metering tariff for the development and operation of their renewable energy projects have been allowed intervention. For example, in docket 4790, the Coalition for Community Solar Access, a "business-led trade organization comprising over forty member companies that work to expand access to clean, local, affordable energy nationwide through community solar," was allowed intervention in a net metering tariff amendment proceeding. In docket 4568, Narragansett's proposed access charge on net metering customers, the PUC allowed intervention for: Conservation Law Foundation, Acadia Center, Wal-Mart Stores East, LP and Sam's East, Inc., Northeast Clean Energy Council, Green Development, LLC dba Wind Energy Development, LLC, The Alliance for Solar Choice, the US Dept. of Navy, Energy Development Partners, LLC, Narragansett Bay Commission, Hectate Energy LLC and CME Energy, and Forbes Street Solar LLC. In docket 4549, WED Coventry One, LLC, WED Coventry Two, LLC, WED Coventry Six, LLC, and WED Portsmouth 1, LLC were allowed intervention.
10. Gridwealth conferred with the other current parties about whether they oppose this motion in accordance with Rule 1.16, but has not received any responsive position as of this filing.

11. Please direct service of any correspondence or pleadings in connection with this proceeding to:

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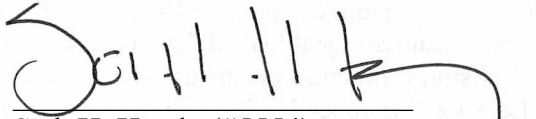
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WHEREFORE, Gridwealth asks that the PUC grant its motion to intervene.

Respectfully submitted,

**MASSAMERICAN ENERGY LLC dba  
GRIDWEALTH DEVELOPMENT,**

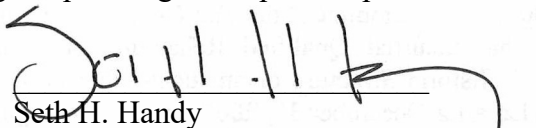
By its attorney,



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CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2024, I sent a true copy of the document by electronic mail to the PUC and the initial service list and filed the original pleading and 9 photocopies with the PUC.



Seth H. Handy