

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**RE: The Narragansett Electric Company  
d/b/a Rhode Island Energy  
2024 Residential Assistance  
Recovery Filing**

**Docket No. 24-17-EL**

**MOTION TO INTERVENE OF THE GEORGE  
WILEY CENTER RELATING TO THE  
RESIDENTIAL ASSISTANCE RECOVERY  
FILING**

The George Wiley Center hereby moves, through counsel, to intervene in the above-captioned proceedings on behalf of low-income utility consumers pursuant to Rule 1.14 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission ("Commission") (R.I. Code of Regulations, Title 810, Chapter 00, Subchapter 00, Part 1, Section 1.14). This Motion to Intervene relates specifically to the RI Energy Residential Assistance Recovery Filing.

In support of this motion, the George Wiley Center states the following:

1. The George Wiley Center is a grassroots, community-based organization comprised of low-income consumers and focused on advocacy for social and economic justice in our state. The George Wiley Center works in partnership with its counsel, the R.I. Center for Justice, a nonprofit public interest law center, to provide legal assistance to low-income individuals and families across the State relating to their rights as consumers.
2. The George Wiley Center has been a leading voice advocating for the interests of

low-income consumers in Rhode Island for more than forty years.

3. Intervention in Commission proceedings is governed by Rule 1.14 of the Commission's Rules of Practice and Procedure, which states at Rule 1.14(B):

Subject to the provisions of these rules, 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. Such right or interest may be:

1. A right conferred by statute.
2. 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.)
3. Any other interest of such nature that movant's participation may be in the public interest.

4. The Commission rule further provides that “all timely motions to intervene not objected to by any party within ten (10) days of service of the motion for leave to intervene shall be deemed allowed” (Rule 1.14(E)).

5. The George Wiley Center advocates for and works with low-income consumers who rely upon the Arrearage Management Program and the Low Income Discount. The proposed Arrearage Management Adjustment Factor (“AMAF”) and Low Income Discount Recovery Factor (“LIDRF”) are of importance to these low-income consumers. Through its counsel, the R.I. Center for Justice, the George Wiley Center facilitates legal representation for low-income consumers seeking to protect their rights as consumers under the law. The George Wiley Center conducts meetings and workshops with low-income utility consumers on a regular basis in order to remain fully informed about the lived experience of low-income consumers, particularly as it relates to their challenges in maintaining affordable utility services in the homes they own and rent.

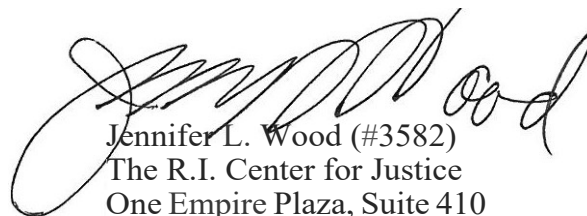
6. Economic impact on all customers, particularly low-income customers, and sustainable access to affordable utility service are central considerations in the PUC's review of the proposed recovery factors in Docket 24-17, and the George Wiley Center is uniquely capable to help to inform issues of economic impact on directly affected low-income consumers due to its extensive work with these affected

consumers over several decades. The George Wiley Center has participated, through its counsel the R.I. Center for Justice, without objection, in many previous PUC Dockets including, most recently, Dockets 4651, 4770, 4780, 4890, 5022, 4978 and LRS dockets including 23-01. The George Wiley Center, through its counsel the R.I. Center for Justice, has prioritized participating in dockets of importance to low-income consumers.

7. The George Wiley Center's participation in Docket 24-17 as an advocate for low-income utility consumers should be granted because the George Wiley Center is able to bring forward the rights and interests of low-income consumers directly affected by the docket, which interests are not adequately represented by existing parties to the docket, (Rule 1.14(B)(2)) and the George Wiley Center is able to assert the perspectives and concerns of low-income consumers affected by the filings and the inclusion of a voice for low-income consumers in this proceeding is in the public interest (Rule 1.14(B)(3)).

WHEREFORE, the George Wiley Center, through its counsel the R.I. Center for Justice, requests that the Commission grant its Motion to Intervene in Docket 24-17 with regard to the 2024 Residential Assistance Recovery, that it be granted status as a party in this proceeding, and that the Commission grant all other relief it deems meet and just.

Respectfully submitted,



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Dated: June 11, 2024

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2024, I sent a true copy of this document by electronic mail to the parties in the Docket 24-17 Service List as of June 11, 2024.