

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN RE: The Narragansett Electric Co. d/b/a
Rhode Island Energy Tariff Advice Filings to
Amend Electric and Gas Tariffs**

DOCKET NO. 24-38-GE

**MOTION TO INTERVENE OF THE GEORGE WILEY CENTER THROUGH ITS
COUNSEL THE RHODE ISLAND CENTER FOR JUSTICE**

The George Wiley Center, through its counsel the Rhode Island Center for Justice, hereby moves 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 (“PUC” or “Commission”) (R.I. Code of Regulations, Title 810, Chapter 00, Subchapter 00, Part 1, Section 1.14). In support of this motion, the George Wiley Center states the following:

I. The George Wiley Center is an Appropriate Intervenor in this Docket

The George Wiley Center is 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 utility consumers. The George Wiley Center has been a leading voice advocating for the interests of low-income consumers, and in particular low-income utility consumers, in Rhode Island for more than forty years. 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.

The 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).

II. The George Wiley Center has a Direct Interest in this Docket, has Historically Participated in Related Dockets to Assert that Direct Interest, and Participation by the George Wiley Center is in the Public Interest.

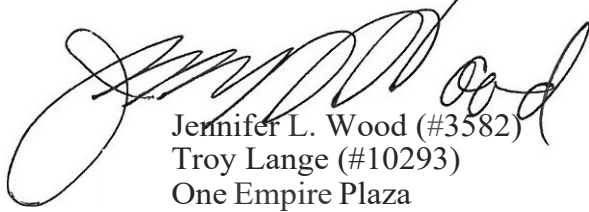
The George Wiley Center advocates for and works with low-income consumers, all of whom will be directly affected by the opt-out fees and tariffs proposed within this docket. The George Wiley Center works in partnership with its counsel, the Rhode Island Center for Justice, to facilitate legal representation of low-income consumers seeking to protect their rights as consumers. Additionally, 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. Economic impact on all customers, including low-income customers, is an important consideration for the PUC in reviewing the proposals within the instant docket. The George Wiley Center is uniquely capable of helping to inform issues of economic impact on low-income utility consumers based on its extensive work with its constituent population over the course of several decades.

Additionally, the George Wiley Center has participated, through counsel, without objection, in many previous PUC dockets. The instant docket is related to costs associated with opting out of new metering technology; the George Wiley Center has previously participated in dockets related to that new metering technology, including docket 22-49-EL and related filings in docket 3628. Further, the George Wiley Center participated extensively in stakeholder meetings regarding Advanced Metering Functionality (AMF) stemming back to 2018. Throughout the aforementioned dockets and stakeholder discussions, the George Wiley Center has appropriately had the ability to advocate for the interests of low-income consumers.

In summary, the George Wiley Center should be able to continue its advocacy on behalf of its constituent population with regards to the instant subject matter by being allowed to intervene in the instant related docket because (1) it is able to bring forward the rights and interests of low-income consumers directly affected by proposals in this docket, which interests will not be adequately represented by other parties to the docket; (2) it 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, and (3) it has been an active participant in discussions regarding AMF for several years. As such, the George Wiley Center's participation in the instant docket is appropriate under Rule 1.14(B)(2) and (3) of the Commission's Rules of Practice and Procedure.

Wherefore, the George Wiley Center, through its counsel the Rhode Island Center for Justice, requests that the Commission grant its Motion to Intervene in Docket 24-38-GE, that it be granted status as a party in this proceeding, and that the Commission grant all other relief it deems just.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "JL Wood", written in a cursive style.

Jennifer L. Wood (#3582)
Troy Lange (#10293)
One Empire Plaza
Suite 410
Providence, RI 02903
(401) 491-1101 (o)
(401) 837-6431 (c)
jwood@centerforjustice.org

Dated: October 29, 2024

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2024, I sent a true copy of this document by electronic mail to the parties in the Docket Service List as of October 29, 2024.