

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

**IN RE: The Narragansett Electric Company
d/b/a Rhode Island Energy Proposed Green
Button Connect, Home Area Network, and
Grid Edge Computing**

DOCKET NO. 25-19-EL

**MOTION FOR INTERVENTION 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:

The George Wiley Center is an Appropriate Intervenor in this Docket

1. 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 pro bono legal assistance to low-income individuals and families across the State relating to their rights as utility consumers.
2. 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.

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)).

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

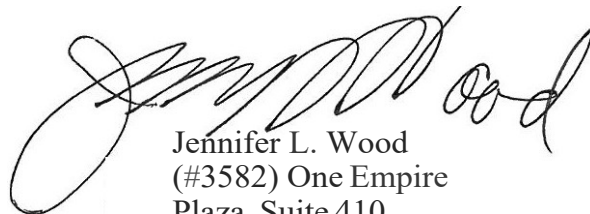
5. The George Wiley Center advocates for and works with low-income consumers, who certainly have an interest in the policies being proposed in the instant docket, as they will impact the way said consumers interact with and get the benefits of the new advanced metering which is being implemented throughout the state. Through its counsel, the R.I. Center for Justice, the George Wiley Center also 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. 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 is best positioned to bring the experiences of low-income consumers with the new meters, and their experiences with the programs that are enabled by the new meters forward in the instant docket. The George Wiley Center will also be in a position to inform the Commission about any problems or concerns that low-income consumers encounter with Green Button Connect, Home Area Network, and Grid Edge Computing attendant to the rollout of the new meters.
7. 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 4600, 4651, 4770, 4780, 4890, 4678, 4978, 5022, 22-08-GE, 22-07-GE, 22-49-EL, and 24-38-GE. The George Wiley Center, through its counsel the R.I. Center for Justice, has particularly prioritized participating in rate setting dockets and other dockets that examine the financial impact of utility business proposals on all consumers, and particularly low-income consumers. The George Wiley Center has done so without objection in several rate dockets and other economic impact dockets in recent years due to its unique ability to reflect the lived experiences and economic circumstances of low-income utility customers. The instant docket involves the way in which ratepayers will be able to interact with the newly implemented advance metering functionality, which is critical for low-income consumers who have an elevated stake in the opportunity to access their meter data to guide their utility consumption and aid in cost containment efforts at the consumer level.
8. As already mentioned, the George Wiley Center intervened in Docket 22-49-EL, the Advanced Metering Functionality Business Case, to which this docket is directly related.

9. The George Wiley Center's participation in Docket 25-19-EL as an advocate for low-income utility consumers should be granted because (1) the George Wiley Center has been an active participant in the advanced metering deliberations in previous dockets; (2) 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 (3) 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)). The George Wiley Center's intervention is necessary and appropriate under both Rule 1.14(B)(2) and Rule 1.14(B)(3) of the Commission's Rules of Practice and Procedure.

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 25-19-EL, 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,



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

Dated: August 8, 2025

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2025, I sent a true copy of this document by electronic mail to the parties in the Docket Service List as of August 8, 2025. Hard copies will be served via regular mail to the Clerk of the Public Utilities Commissi