

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

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 CONSERVATION LAW FOUNDATION**

I. Introduction

The Conservation Law Foundation (“CLF”), pursuant to Public Utilities Commission (“PUC” or “Commission”) Rule of Practice and Procedure 1.14(B), hereby moves to intervene in Docket No. 25-19-EL. CLF’s participation in this proceeding will be in the public interest within the meaning of PUC Rule 1.14(B)(3).

On May 12, 2025, Narragansett Electric Company, d/b/a Rhode Island Energy (“RIE” or “the Company”) filed with the Commission a compliance filing in Docket 22-49-EL, entitled *Compliance Filing – Open Meeting Motion 13*, which contained the Company’s plans for its Green Button Connect (“GBC”) program, Home Area Network (“HAN”) program, and Grid-Edge Computing (“edge-computing”) program.

On June 11, 2025, the Commission Clerk emailed the service list for Docket 22-49-EL notice that this filing would be docketed under 25-29-EL.

On July 28, 2025, Commission Counsel distributed a procedural schedule for Docket 25-19-EL that included a deadline for intervention of August 8, 2025.

Pursuant to PUC Rule 1.16(B), on August 7, 2025 CLF contacted the Company, to determine if there was an objection to CLF’s proposed intervention in this Docket. As of filing of

this motion, CLF had not received an indication as to whether the Company would oppose intervention.

II. The Standard Governing this Motion

Intervention in PUC proceedings is governed by PUC Rule 1.14. CLF bases its motion on the provisions of Rule 1.14(B)(3), which states that a party may intervene where “appropriate” if the party has “any . . . interest of such nature that movant’s participation may be in the public interest.”

III. The Intervenor

CLF is New England’s leading environmental advocacy organization. Since 1966, CLF has worked to protect New England’s people, natural resources, and communities. CLF is a nonprofit, member-supported organization with offices throughout New England. The Rhode Island office of CLF is located at 235 Promenade Street, Suite 560, Providence.

CLF promotes clean, renewable, and efficient energy production and heating throughout New England and has an unparalleled record of advocacy on behalf of the region’s environmental resources. In the course of its 58-year history, CLF has been a party in the landmark case where the United States Supreme Court ruled that the Environmental Protection Agency has an obligation under the Clean Air Act to consider regulating tailpipe emissions that contribute to global warming, *Massachusetts v. E.P.A.*, 127 S. Ct. 1438 (2007); CLF has obtained an injunction to stop oil and gas drilling in the environmentally sensitive Georges Bank, *Conservation Law Foundation v. Sec’y of the Interior*, 790 F.2d 965 (1st Cir. 1986); CLF has litigated to ensure enforcement of an earlier settlement agreement in a case stemming from the Big Dig, which settlement agreement required twenty public transit projects in and around Boston, including the construction of additional subway and rail lines, *Conservation Law*

Foundation v. Romney, 421 F. Supp. 2d 344 (D. Mass. 2006); and CLF has successfully advanced legal strategies to restore groundfish to the Gulf of Maine and southern New England waters, *Conservation Law Foundation v. Evans*, 211 F. Supp.2d 55 (D.D.C. 2002).

Additionally, CLF has a long history of productive participation in dockets before the Commission. These include Docket No. 4111 (the first of two dockets concerning Deepwater Wind's proposed Block Island demonstration wind project); Docket No. 4185 (the second of two dockets concerning Deepwater Wind's proposed Block Island demonstration wind project); Docket No. 4600 (concerning the development of goals for the future electric system and a benefit-cost framework for proposals before the PUC); Dockets No. 4770 (the most recent gas and electricity distribution rate case) and 4780 (the concurrent Power Sector Transformation case); Docket No 22-42-NG (Commission advisory opinion re: the Company's application to construct a LNG Vaporization Facility); Docket No. 22-49-EL (advanced metering functionality); Docket No. 24-30-EL (Last Resort Service Procurement Plan); Dockets No. 23-48-EL and 24-54-EL (recent electric infrastructure, safety and reliability plans); and Dockets No. 23-49-NG and 24-55-NG (recent gas infrastructure, safety and reliability plan). CLF has also submitted public comments in prior Gas ISR dockets, *see* Docket No. 5099, and is an active participant and member of the stakeholder group in Docket No. 22-01-NG (the Commission's ongoing investigation into the future of the state's gas distribution system in light of the Act on Climate).

IV. CLF's Interest in This Proceeding

As an organization committed to using the law to protect New England's environment and combat the climate crisis, CLF has extensive experience in energy law and policy. As noted above, CLF participated in the precursor to this proceeding, Docket 22-49-EL which evaluated

the Company's proposal to install advanced meters throughout its Rhode Island service territory. Through its participation in that investigation, CLF became acutely aware of the importance of the intersection of data and climate action. The primary purpose of CLF's previous engagement was the enablement of time-of-use rates through the functionality offered by the installation of advanced meter infrastructure in Rhode Island.¹ The testimony offered by Mission:data Coalition² regarding the impact of different data access policies associated with meter installation was informative and compelling. It is CLF's belief that the Commission's decision in this docket will have a direct impact on systemic policy, including time-of-use rates, and consumer behavior with respect to climate action. It is possible that decisions may limit the availability of software solutions and data analysis that may drive policy and behavior to achieve our state's required emissions reductions.³

It is CLF's intention to offer expert testimony on the intersection of meter data policy and climate action. Policy decisions made in this docket will impact Rhode Island's ability to meet its statutory obligations under the Act on Climate, and allowing CLF to participate and help inform the Commission's consideration of these issues will serve the public interest. CLF has extensive experience related to the creation, implementation, and interpretation of statutes mandating emissions reductions throughout New England, including successful litigation to require Massachusetts to create and implement regulations to meet its carbon emissions reduction mandates under its equivalent of the Act on Climate—the Global Warming Solutions Act. *See Kain v. Dep't of Env't Prot.*, 49 N.E.3d 1124 (Mass. 2016). Moreover, the participation in this proceeding of a public interest organization such as CLF will serve the public interest. *See,*

¹ Conservation Law Foundation, Statement of Issues for Open Meeting, RI PUC Docket 22-49-EL. Aug. 24, 2023.

² *See*, Michel Murray, Direct Testimony on behalf of Mission:data Coalition. RI PUC Docket 22-49-EL.

³ RI. Gen. Laws. § 42-6.2-9.

generally, John E. Bonine, *Public Interest Environmental Lawyers: Global Examples and Personal Reflections*, 10 Widener L. Rev. 451 (2004) (emphasizing the constructive and salutary role of public interest environmental lawyers in a wide range of legislative, judicial, and regulatory fora).

V. Conclusion

WHEREFORE, for the foregoing reasons, CLF respectfully requests that its motion to intervene in this Docket be granted.

Respectfully submitted,

CONSERVATION LAW FOUNDATION
By its attorney,

/s/ James Rhodes

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CERTIFICATE OF SERVICE

I certify that the original and nine copies of this motion were sent via First Class Mail to the Public Utilities Commission. In addition, the motion was provided electronically to the service list on August 7, 2025.

/s/ James Rhodes