

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: THE NARRAGANSETT ELECTRIC COMPANY :  
d/b/a RHODE ISLAND ENERGY'S :  
PROPOSED FY 2027 ELECTRIC :  
INFRASTRUCTURE, SAFETY AND :  
RELIABILITY PLAN : Docket No. 25-54-EL**

**THE ATTORNEY GENERAL OF THE STATE OF RHODE ISLAND'S  
MOTION TO INTERVENE**

NOW COMES Peter F. Neronha, Attorney General of the State of Rhode Island (“Attorney General”), and hereby moves to intervene with full-party status in the above-captioned proceeding in accordance with Rule 1.14(B) of the Public Utilities Commission’s (the “Commission”) Rules of Practice and Procedure (the “Commission Rules”).

**I. Standard of Review**

Commission Rule 1.14(B) states that “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.” 810-RICR-00-00-1.14(B). Further, such right or interest may be:

- a. A right conferred by statute.
- b. 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.)
- c. Any other interest of such a nature that movant’s participation may be in the public interest.

810-RICR-00-00-1.14(B)(1)-(3). As explained below, the Attorney General has a statutory right to intervene and is in a unique position to represent the interests of the State and the public such that intervention is both necessary and appropriate. R.I. Gen. Laws §§ 10-20-3, 39-1-19, 42-9-6.

## **II. Basis for Intervention**

On December 22, 2025, The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”) filed its Fiscal Year 2027 Electric Infrastructure, Safety and Reliability (“ISR”) Plan. At the time of filing, the Division and Company had not reached agreement with respect to the Electric ISR Plan despite having consulted with each other since at least October 17, 2025. *See* Filing Correspondence (December 22, 2025)(“[T]he Company and the Division did not reach a mutual agreement on the enclosed Electric ISR Plan.”). R.I. Gen. Laws § 39-1-27.7.1(d)(4) provides that “[i]f the company and the division cannot agree on a plan, the [C]ompany shall file a proposed plan with the [C]ommission and the [C]ommission shall review and, if the investments and spending are found to be reasonably needed to maintain safe and reliable distribution service over the short and long term, approve the plan within ninety (90) days.”

The ISR Plan addresses the Company’s proposed activities from April 2026 through March 2027 with respect to, *inter alia*: capital spending on electric infrastructure; operation and maintenance (“O&M”) expenses on vegetation management; O&M expenses on system inspection; and other costs related to maintaining the safety and reliability of the electric distribution system. The Company proposes some \$153.7 million in capital spending (including \$13.8 million related to implementing Advanced Metering Functionality (“AMF”)). The ISR Plan also addresses the revenue requirement, rate design, and bill impacts related to the Company’s proposal.

In this docket, the Attorney General seeks to represent the interests of the ratepayers and the public as a whole. He is in a unique position to represent these interests and should be permitted to do so. The Attorney General is, pursuant to § 42-9-6 of the General Laws of Rhode Island of 1956, as amended, the “legal advisor of all state boards, divisions, departments, and commissions and the officers thereof...” He is also the public officer charged with representing the State of Rhode Island, the public interest, and the people of the State. This includes representation with respect to environmental, electric or gas industry matters, as well as consumer protection matters. The Attorney General also serves as the State’s environmental advocate and has a legal duty to “take all possible action” to secure and ensure compliance with Rhode Island’s environmental quality standards and laws. R.I. Gen. Laws § 10-20-3. Capital investments, as well as their financial effects, stand to substantially impact the State’s ability to achieve its environmental and renewable energy goals and requirements, including efforts to comply with the 2021 Act on Climate. To be sure, increasing electrification of transportation and heating is essential for the State in working towards mandated emission reductions.

Additionally, the Attorney General “has a common law duty to protect the public interest.” *State v. Lead Indus., Ass’n, Inc.*, 951 A.2d 428, 471 (R.I. 2008) (quoting *Newport Realty, Inc. v. Lynch*, 878 A.2d 1021, 1032 (R.I. 2005)). Moreover, the legislature and courts have recognized the role of the Attorney General as an intervenor on behalf of the state or its residents as customers of the public utility. *See e.g.* R.I. Gen. Laws § 39-1-19(b), *see also* *Narragansett Elec. Co. v. Harsch*, 117 R.I. 395, 405 n. 6 (1977).

It should also be noted that the Attorney General has been granted full-party status in prior proceedings before the Public Utilities Commission involving public utility operations and rates, including past ISR proceedings. This also includes the related Commission Docket No. 22-49-EL,

which considered and conditionally approved the Company's implementation of AMF, where the Attorney General intervened and participated as a full party.

Participation by the Attorney General in the instant proceeding is sanctioned by law and consistent with the public interest. The Attorney General seeks to intervene to ensure that the Company's ISR Plan is fully vetted and that any potential impacts and/or alternatives are carefully considered. This includes careful consideration of financial impacts, the Company's plans for implementation of AMF and its related obligations, and other impacts related to the State's compliance with the Act on Climate's greenhouse gas emission reduction mandates. *See* R.I. Gen. Laws § 42-6.2-9.

### **III. Conclusion**

For the reasons set forth herein, the Attorney General respectfully requests that the Public Utilities Commission grant his Motion to Intervene as a full party in this proceeding.

The Attorney General has consulted with the Company; however, the Company has declined to take a position concerning the Attorney General's intervention prior to the filing of the within motion.

Respectfully submitted,

PETER F. NERONHA  
ATTORNEY GENERAL OF THE  
STATE OF RHODE ISLAND

By his attorney,

/s/ Nicholas M. Vaz  
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Dated: January 21, 2026

CERTIFICATE OF SERVICE

I hereby certify that on the 21<sup>st</sup> day of January 2026, the original and nine hard copies of this Motion were sent, via electronic mail and first-class mail, to Stephanie De La Rosa, Clerk of the Public Utilities Commission, 89 Jefferson Boulevard, Warwick, RI 02888. In addition, electronic copies of the Motion were served via electronic mail on the service list for this Docket on this date.

/s/ Nicholas Vaz