

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

In Re: The Narragansett Electric Company
d/b/a National Grid:
Energy Efficiency Program Plan for 2015

Docket No. 4527

**PETITION TO INTERVENE OF THE GEORGE WILEY CENTER
AND NATIONAL HOUSING TRUST**

Pursuant to Commission Rules of Practice and Procedure 1.13, the George Wiley Center (“Wiley Center”) and National Housing Trust (“NHT”) hereby jointly petition to intervene in Docket No. 4527 regarding the National Grid (“NGRID” or “Company”) Energy Efficiency Plan for 2015. In support of this petition, the Wiley Center and NHT state:

1. On or about October 31, 2014, NGRID filed its energy efficiency plan for 2015 (“Plan”), pursuant to R.I.G.L. § 39-1-27.7 and applicable Commission orders, including in Docket 4443. Among the many customer segments discussed in the Plan, NGRID describes how it plans to serve the multifamily housing section through “Energywise Multifamily.” The Company notes that it considers the “multifamily sector as a major priority”, one that has “vast potential for deep savings.” The Company further notes that it has set up a “multifamily working group” and received advice from “national experts” in developing the multifamily portion of its Plan.¹

FACTS SUPPORTING INTERVENTION OF THE WILEY CENTER

2. The Wiley Center is a non-profit membership organization with a business address at 32 East Avenue, Pawtucket, RI. The Wiley Center works with members of the low-income community to advocate for systematic changes aimed at alleviating problems associated with poverty, with a special focus on food and energy insecurity issues in Rhode Island.

¹ Plan, Attachment 1, pp. 5-6.

3. The Wiley Center is itself a customer of NGRID, and many of its approximately 500 members are also NGRID customers. Because those members are predominantly low-income, they disproportionately reside in multifamily rental housing, as opposed to one-family homes.

4. Because many of its members live in multifamily housing, the Wiley Center has a strong interest in ensuring that NGRID offers energy efficiency programs that meet the particular energy needs of those buildings. For low-income tenants who pay for some or all of their energy needs directly, NGRID's efficiency programs can be an important tool for reducing energy consumption and, thereby, making energy bills more affordable. To the extent that the owners of the multifamily buildings in which Wiley Center members reside pay some or all of the energy bills, increasing the building's energy efficiency and reducing the owner's bills increases the comfort and well-being of the tenants while moderating upward pressures on the rents tenants pay.

5. The Wiley Center, through its leadership team and its legal counsel, has been monitoring and attending the proceedings before the Energy Efficiency Resource Management Council (EERMC) which led to the development of the Plan, and offered advice and assistance to NGRID and the EERMC's consultants during the drafting of the Plan, specifically regarding the multifamily portions of the Plan.

6. Both the Wiley Center as a corporate entity and many of its members are "consumers served by the applicant", one of the categories of parties who "may have . . . an interest" in a proceeding sufficient to justify the granting of intervention status. Rule 1.13(b)(2). Given the Wiley Center's interest in ensuring that NGRID offers strong efficiency programs for multifamily housing, and specifically for buildings primarily serving low income tenants, its interests are not adequately represented by other parties, including the Attorney General, as the

Attorney General must represent the broad interests of all ratepayers. The Wiley Center believes that the Attorney General may not specifically address during these proceedings the multifamily portions of the Plan.

7. The Wiley Center's participation in this docket is also "in the public interest", within the meaning of Rule 1.13(b)(3). As the Division of Public Utilities and Carriers held in D-06-13 (May 4, 2006):

In deciding whether the "public interest" demands the participation of these movants [in that docket], the Division must logically find that their individual interests warrant recognition and protection in furtherance of the general welfare of the public.²

D-06-13, p. 16. In that case, the Division found that "the Wiley Center's participation in this docket is generally in the public interest." *Id.*, pp. 20-21.

FACTS SUPPORTING INTERVENTION OF NATIONAL HOUSING TRUST (NHT)

8. NHT is a not-for-profit organization located at 1101 30th Street NW, Suite 100A, Washington D.C.

9. NHT is dedicated to protecting and improving existing multifamily affordable housing so that low-income individuals and families can live in quality neighborhoods with access to opportunities. NHT works to ensure that low-income renters can benefit from energy efficient, healthy homes. NHT has long recognized that keeping energy costs low in multifamily housing is critical to maintaining affordable homes for low-income families. Together with its partners, NHT has been working to overcome the challenges to serving the multifamily housing sector with utility energy efficiency resources. In recognition of its leadership in this field, NHT was named this year's Andromeda Star award recipient by the Alliance to Save Energy.

10. For several years now, NHT has been working with local groups in a number of states to increase the efficacy and adequacy of utility funded energy efficiency programs for

² The Division was interpreting its rule 17(b)(2), which in substance is identical with Commission Rule 1.13(b)(2).

multifamily housing. NHT began working with local groups in Rhode Island approximately 3 years ago.

11. In addition to the local, low-income consumer perspective that the Wiley Center can add to this proceeding, NHT can add its expertise in the design and implementation of multifamily energy efficiency programs.

12. It is in the public interest pursuant to Rule 1.13(b)(3) to allow NHT to intervene in this proceeding.

13. Allowing the Wiley Center and NHT to intervene in this proceeding will neither unduly burden the parties nor delay prompt resolution of this docket. The Wiley Center and NHT are fully aware of the already-set schedule and fully intend to comply with it.

WHEREFORE, the Wiley Center and NHT ask that their joint petition to intervene be allowed.

Respectfully submitted,

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³ On October 21, 2014, a miscellaneous petition was filed with the Rhode Island Supreme Court to allow Mr. Harak to appear pro hac vice before this Commission. The court clerk has advised Mr. Harak that the petition should be addressed by the Court by November 14, 2014.

CERTIFICATE OF SERVICE

I, Steven Fischbach, do affirm that an electronic copy of the foregoing “Petition To Intervene Of The George Wiley Center And National Housing Trust” was duly served November 13, 2014, by e-mail upon each party on the Docket 4527 Service List, as updated November 6, 2014, a copy of which is appended.

Any party who wishes to obtain a hard copy by U.S. mail of the Petition may contact me at sfischbach@rils.org or 401 274-2652 x182.

Steven Fischbach