



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Administration
DIVISION OF LEGAL SERVICES
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Andrew S. Marcaccio
Sr. Legal Counsel

November 10, 2016

SENT VIA FIRST CLASS MAIL AND ELECTRONIC MAIL:

Luly E. Massaro
Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

RE: Energy Efficiency Program Plan 2017 and the 2017 System Reliability
Procurement Report [Docket Numbers 4654 and 4655]

Dear Ms. Massaro:

Please see attached Motion to Intervene (an original plus ten (10) copies) pertaining to
the above mentioned matter.

Sincerely,

Andrew S. Marcaccio
Sr. Legal Counsel

ASM/njr

Enclosure

c. Docket Lists - 4654 and 4655

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

**IN RE: ENERGY EFFICIENCY PROGRAM PLAN 2017 AND THE 2017 SYSTEM
RELIABILITY PROCUREMENT REPORT [DOCKET NO's. 4654 AND 4655]**

**MOTION TO INTERVENE
BY THE RHODE ISLAND OFFICE OF ENERGY RESOURCES**

By its attorneys, the Rhode Island Office of Energy Resources (“OER”), hereby moves to intervene in the above-captioned proceeding pursuant to Rule 1.13 (a) and (b) of the Rhode Island Public Utilities Commission (“PUC”) Rules of Practice and Procedure (“Rules”). In support of this motion, OER provides:

1. OER is the Rhode Island State agency responsible for implementing and overseeing the state's energy policies and programs. The OER was created by the General Assembly in 2006.
2. Rule 1.13 allows for any person claiming an interest of such nature that intervention is necessary or appropriate to submit a motion to intervene in any proceeding before the PUC.
3. Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.
4. OER is referenced directly in R.I. Gen. Laws § 39-1-27.7(c)(1) & (3) relating to the subject matter in this proceeding. It is necessary and appropriate to grant OER’s motion to intervene because OER has a vested interest which is directly affected by this proceeding.

WHEREFORE, based on the reasons stated herein, the OER respectfully requests that the PUC grant this motion and allow the OER to intervene.

Please direct service of any correspondence or pleadings in connection with this proceeding to:

Carol Grant
Commissioner
Rhode Island Office of Energy Resources
One Capitol Hill, Fourth Floor
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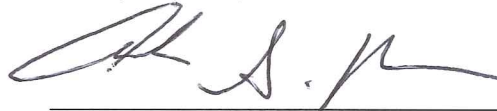
Nicholas Ucci
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Respectfully Submitted,
The OFFICE OF ENERGY RESOURCES,

By their Attorneys,



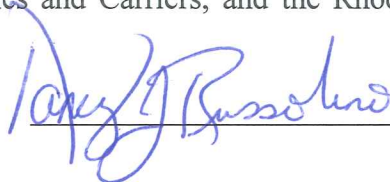
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CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2016, I mailed this original pleading and 10 copies to the PUC and sent a true copy of the document by electronic mail to the parties, the Office of Energy Resource, National Grid, The Division of Public Utilities and Carriers, and the Rhode Island Office of the Attorney General.

A handwritten signature in blue ink, appearing to read "Amy J. Russo", is written over a horizontal line.