

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

Petition of the Episcopal Diocese of Rhode  
Island for Declaratory Judgment on  
Transmission System Costs and Related  
“Affected System Operator” Studies

**Docket No. 4981**

**THE EPISCOPAL DIOCESE OF RHODE ISLAND**  
**OBJECTION**

The Episcopal Diocese of Rhode Island objects to the “public comment” filed by the Narragansett Electric Company d/b/a National Grid and asks the Commission to strike it from the record and not consider it. TNEC has intervened in this docket without objection and is, therefore, a party to this proceeding. The procedural schedule required TNEC’s intervention and comments and legal memoranda by November 22, 2019. The Diocese then had until December 4, 2019, to file its reply. In the interest of expeditious resolution of this matter, under the Commission rules, there was no provision for TNEC to file an additional surreply. TNEC did not even request any such authorization in the procedural conference. If it had, the Diocese certainly would have asked for time to file its own reply. At the open meeting held on December 17, 2019, the Commission decided to seek public comments and then have a hearing on this matter.

TNEC may have unlimited time and (ratepayer) money to file pleadings in this docket. The Diocese does not. If TNEC prefers to be treated as a member of the “public,” and not a party to this proceeding, and the Commission accepts its preference, then the Diocese will present its argument at the hearing without any opposition from TNEC. Otherwise, TNEC’s “public comment” must be stricken from the record of this proceeding and not considered.

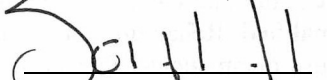
If the Commission did intend to authorize parties to provide additional comments as part of a public comment period, the Diocese objects to that procedure. Such allowance effectively authorizes respondents to have the final opportunity for briefing. Having filed its reply to the original briefs, the Diocese was in no position to offer public comment responding to its reply brief. Allowing respondents to have the final opportunity to brief is completely out of keeping with standard rules of procedure.

While the Diocese is tempted to file responsive “public comment” to refute the (confusing and unfounded) substance of TNEC’s pleading, such a reply is unauthorized and would be inappropriate. However, if this proverbial “bell has already rung” and there is now no way to prevent any potential undue influence on the Commission (or its staff), then the Diocese must request the opportunity to formally respond to TNEC’s filing.

**THE EPISCOPAL DIOCESE OF  
RHODE ISLAND**

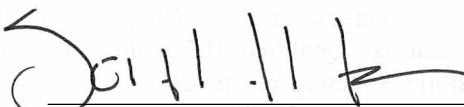
By its attorneys,

**HANDY LAW, LLC**

  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 24, 2020, I delivered a true copy of the foregoing document to the service list by electronic mail.

  
Seth H. Handy