

August 10, 2020

VIA ELECTRONIC MAIL

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

**RE: Docket 5042 – Central Falls Request for Approval of Community
Electric Aggregation Plan
National Grid’s Motion of Intervention**

Dear Ms. Massaro:

Enclosed is National Grid’s¹ Motion of Intervention in the above-referenced docket.²

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Very truly yours,



Andrew S. Marcaccio

Enclosure

cc: Docket 5042 Service List
Leo Wold, Esq.
John Bell, Division

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

² Per practice during the COVID-19 emergency period, the Company is providing a PDF version of the above-referenced transmittal. The Company will provide the Commission Clerk with a hard copy and, if needed, additional hard copies at a later date.

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: CITY OF CENTRAL FALLS :
REQUEST FOR APPROVAL OF : **DOCKET NO. 5042**
COMMUNITY ELECTRIC :
AGGREGATION PLAN :

MOTION TO INTERVENE OF
THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID

The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”) hereby respectfully requests that the Public Utilities Commission (“Commission”) grant the Company’s intervention in the above referenced docket pursuant to 810-RICR-00-00-1.14. The reasons for intervention are set forth in this motion to intervene (this “Motion”). In accordance with 810-RICR-00-00-1.16(B) and based on a pre-conference that occurred on August 4, 2020, it is the Company’s belief that this Motion will not be opposed.

INTRODUCTION

1. On or around July 6, 2020, the City of Central Falls (“Municipality”) filed a petition with the Commission, pursuant to R.I. Gen. Laws § 39-3-1.2 (“Municipal Aggregation Statute”), for approval of its Community Electricity Aggregation Plan (“Municipal Aggregation Plan”).
2. On or around July 15, 2020, the Commission established the above-referenced docket to review the Municipality’s petition. On August 4, 2020, the Commission held a pre-conference and set an August 14, 2020 deadline for interventions in this proceeding. At the pre-conference, the Municipality, through Good Energy, L.P. (“Good Energy”)¹, the Division of Public Utilities and Carriers (“Division”), and the Office of Energy Resources (“OER”) indicated that they would not oppose this Motion.

¹ Good Energy was contracted by the Municipality to assist with the preparation of the Municipal Aggregation Plan and related regulatory filings.

3. The Municipal Aggregation Statute enables municipal aggregation through which a city or town may aggregate its electric load and procure electric supply from a nonregulated power producer for its residents and businesses. Residents and businesses who will be included in municipal aggregation plans are also distribution customers of the Company.
4. The Municipality, Good Energy, and nonregulated power producers from which municipal aggregators procure power supply may need to collaborate with the Company to fulfil their responsibilities under the Municipal Aggregation Plan.

LEGAL STANDARD

5. Intervention in Commission proceedings is governed by 810-RICR-00-00-1.14 which provides 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.” See 810-RICR-00-00-1.14(B).
6. It is appropriate for the Commission to grant a motion to intervene when (1) the right of intervention is conferred by statute; (2) a movant may be bound and its interests may be directly affected by the proceedings, and those interests are not adequately represented by existing parties; or (3) the movant holds an interest of such nature that the movant's participation may be in the public interest. See 810-RICR-00-00-1.14(B)(1) through (3).

ARGUMENT

7. The Company’s intervention in the above-referenced docket is necessary and appropriate, and the Company’s participation is in the public interest.

8. National Grid is seeking intervention pursuant to 810-RICR-00-00-1.14(B)(2) and B(3).

The Company does not have a position in this proceeding. Rather, the Company is seeking intervention in the above-referenced docket so that it can effectively fulfil its responsibilities as an electric distribution company within the state. As mentioned above and consistent with the Municipal Aggregation Statute, distribution customers of the Company will be included within the Municipal Aggregation Plan. See R.I. Gen. Laws § 39-3-1.2(a). In addition, the Company has a responsibility to provide the Municipality with reasonable and timely access to information that is pertinent to the formation of the Municipal Aggregation Plan. See R.I. Gen. Laws § 39-3-1.2(b). Intervention in this docket will allow the Company to effectuate its responsibilities in a manner that is beneficial to its customers and consistent with any applicable terms and conditions.² As such, the public interest would be served by National Grid's intervention in this proceeding.

CONCLUSION

For all of the foregoing reasons, National Grid hereby respectfully requests that the Commission grant its motion to intervene in this proceeding as a full party.

WHEREFORE, the Company respectfully requests that the Commission grant its Motion to Intervene as stated herein.

[Signature block starts on next page]

² The Company anticipates filing proposed Municipal Aggregation Terms & Conditions for Commission review by August 12, 2020.

Respectfully submitted,

NATIONAL GRID

By its attorney,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

Andrew S. Marcaccio (RI Bar #8168)
National Grid
280 Melrose Street
Providence, RI 02907
(401) 784-4263
Andrew.Marcaccio@nationalgrid.com

Dated: August 10, 2020

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

Joanne M. Scanlon

August 10, 2020
Date

**Docket No. 5042 – City of Central Falls Community Choice Electricity Aggregation Plan
Service List updated 8/4/2020**

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