

September 29, 2020

ELECTRONIC AND REGULAR MAIL

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

STEPHEN J. MACGILLIVRAY

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Admitted in: RI, MA, NY

**Re: Docket No. 5058 - The Narragansett Electric Co. d/b/a National Grid –
Application to add Terms and Conditions for Municipal Aggregators
(R.I.P.U.C. No. 2222)**

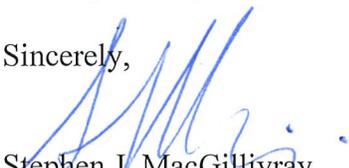
Dear Ms. Massaro:

Attached please find the Late-Filed Motion to Intervene (“Motion”) on behalf of Colonial Power Group, Inc. (“Colonial”) for filing in the above-referenced proceeding as well as Colonial’s initial comments in line with the established procedural schedule. Due to the COVID-19 Pandemic emergency period, Colonial is providing a pdf version of the above-referenced Motion and contemporaneously mailing a paper copy. Additional paper copies can be provided upon request.

Please also enter my appearance on behalf of Colonial in this matter. Please contact me if you have any questions with respect to this matter.

Thank you for your courtesy and consideration.

Sincerely,


Stephen J. MacGillivray

Enclosure

cc: Mark Cappadona, President, Colonial Power Group, Inc.
Denise Allard, Sr. Vice President, Colonial Power Group, Inc.
Stuart Ormsbee, Vice President, Colonial Power Group, Inc.
James M. Avery, Esq.
See also attached Certificate of Service

CERTIFICATE OF SERVICE

I, Stephen J. MacGillivray, Esq., hereby certify that on this 29th day of September, 2020, the foregoing letter was filed with the Rhode Island Public Utilities Commission. All counsel of record listed below have been served, via email, as follows:

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File an original (with electronic copies) to: Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov;	401-780-2017
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/s/ Stephen J. MacGillivray

**STATE OF RHODE ISLAND
AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION**

**IN RE: TERMS AND CONDITIONS)
FOR MUNICIPAL AGGREGATORS)**

DOCKET NO. 5058

ENTRY OF APPEARANCE

I, Stephen J. MacGillivray, Esq., of Pierce Atwood LLP, hereby enter my appearance as attorney for Colonial Power Group, Inc., in the above-captioned case.

COLONIAL POWER GROUP, INC.

By its Attorneys,

/s/ Stephen J. MacGillivray

Stephen J. MacGillivray (#5416)

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Dated: September 29, 2020

**STATE OF RHODE ISLAND
AND PROVIDENCE PLANTATIONS**

PUBLIC UTILITIES COMMISSION

**IN RE: TERMS AND CONDITIONS)
FOR MUNICIPAL AGGREGATORS)**

DOCKET NO. 5058

LATE-FILED MOTION TO INTERVENE OF COLONIAL POWER GROUP, INC.

Colonial Power Group, Inc. (“Colonial”) hereby respectfully requests that the Public Utilities Commission (“Commission”) grant Colonial’s intervention in the above-referenced docket pursuant to 810-RICR-00-00-1.14. The reasons for intervention are set forth in this Late-Filed Motion to Intervene (“Motion”). Colonial maintains a longstanding and constructive working relationship with Narragansett Electric – d/b/a/ National Grid’s (“Company”) affiliate on essentially identical matters, and has been authorized to indicate that the Company does not oppose this motion.

INTRODUCTION

1. On August 11, 2020, the Company filed its request to add certain terms and conditions for the operation of municipal aggregations within their distribution territory and the obligations of those entities that are part of the operations of a municipal aggregation program.
2. On September 4, 2020, a procedural schedule was set for this docket establishing the September 11, 2020 deadline for intervention.
3. Colonial did not file a petition by such date due to the press of other business, including client requirements made more challenging during these times.
4. Colonial has more than 80 Massachusetts community aggregation plan clients and expects to serve communities in Rhode Island. Colonial respectfully submits that it has established and maintained a strong and effective working relationship with the Company’s expected team related to aggregation plan matters and may also be able to

offer substantial insight to the Commission on the best means to administer aggregation plans effectively and for the benefit of customers. Finally, Colonial and Company will need to collaborate for the efficient implementation of the proposed aggregation programs including the securing share of customer information in order to prepare municipal competitive supply bids and the subsequent enrollment of customers into an aggregation plan.

5. Colonial has good cause for filing late, is willing to accept the established procedural schedule, and has a long and innovative history of administering aggregation plans in Massachusetts and working effectively and constructively with the Company's affiliate on these same matters. This experience and expertise may provide helpful insights to the Commission, the Company and other parties.

LEGAL STANDARD

6. 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." 810-RICR-00-00-1.14(B).
7. The Commission may grant the motion to intervene when: (1) the right of intervention is conferred by statute; (2) a movant may be bound the Commission's action in the proceeding and its interests are not adequately represented by existing parties; or (3) the movant's intervention is in the public interest. See 810-RICR-00-00-1.14(B)(1) through (3).

ARGUMENT

8. Colonial's intervention in this docket is beneficial and appropriate, and Colonial's participation in the docket is in the public interest pursuant to 810-RICR-00-00-1.14(B)(2) and (B)(3).
9. Colonial currently represents numerous communities in Massachusetts pursuant to a similar tariff and expects to represent communities in Rhode Island. As such, its ability to fulfill its obligations with respect to these communities will be affected by the establishment of these proposed terms and conditions. As Colonial's business operations and professional services will be dictated by these terms and conditions, intervention is necessary and appropriate to represent Colonial's interests consistent with RICR-00-00- 1.14(B)(2).
10. Colonial's concerns are articulated in its comments filed coincidentally with this motion and its proposed enhancements to the tariff and aggregation plan administration generally is in the public interest consistent with RICR-00-00-1.14(B)(3).

CONCLUSION

For the foregoing reasons, Colonial hereby requests that the Commission grant its Late-Filed Motion to Intervene in this proceeding as a full party.

WHEREFOR, Colonial requests that the Commission grant its Late-Filed Motion to Intervene as stated herein.

Respectfully submitted,

COLONIAL POWER GROUP, INC.

By its attorneys,

/s/ Stephen J. MacGillivray

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Dated: September 29, 2020