

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 18-0974-TF

	)
Tariff Filing of Green Mountain Power	)
Corporation's requesting a base rate increase	)
effective January 1, 2019	)

RENEWABLE ENERGY VERMONT

MOTION TO INTERVENE

NOW COMES Renewable Energy Vermont ("REV") and pursuant to Vermont Public Utility Commission ("Commission" or "PUC") Rule 2.209(B), moves to intervene in the above-captioned proceeding. Grounds for this motion are as follows:

1. Commission Rule 2.209(B) governs permissive intervention in Commission proceedings, and provides:

(B) Permissive intervention. Upon timely application, a person may, in the discretion of the Commission, be permitted to intervene in any proceeding when the applicant demonstrates a substantial interest which may be affected by the outcome of the proceeding. In exercising its discretion in this paragraph, the Commission shall consider (1) whether the applicant's interest will be adequately protected by other parties; (2) whether alternative means exist by which the applicant's interest can be protected; and (3) whether intervention will unduly delay the proceeding or prejudice the interests of existing parties or of the public.
2. REV meets the above-standards for permissive intervention in this proceeding and REV's motion is timely within the Commission's procedural order.
3. REV has a substantial interest in this proceeding which may be affected by the outcome of the proceeding. A non-profit trade organization, REV's membership includes businesses, non-profits, and utility customers committed to reducing reliance on fossil fuels by increasing clean renewable energy and energy efficiency in Vermont. GMP's rate filing identifies net-metering as a driver for this proceeding. REV's members work with customers to provide renewable energy services, including net meter renewable electricity generation projects, energy storage, renewable heating, electric vehicles and associated charging infrastructure, and more in Vermont. REV consistently participates in proceedings before the legislature and

Commission regarding net metering and other renewable energy infrastructure issues. REV has a substantial interest in ensuring that current and future Green Mountain Power customers, as well as current and future REV member customers and local businesses, and progress toward the State total renewable energy and greenhouse gas pollution reduction commitments are not adversely impacted by proposals, positions or actions taken in this docket.

4. REV regularly participates in proceedings before the Commission on behalf of its membership and has been granted intervenor status regularly.
5. The interests of REV are not adequately protected by other parties to this proceeding. The Department of Public Service (“DPS”) represents the general interests of the public. REV’s members have different and unique interests that sometimes differ from those of DPS.
6. REV’s participation will not unduly delay the proceeding or prejudice the interests of existing parties or of the public.

Dated at Montpelier, Vermont, this 26 day of June, 2018.

Renewable Energy Vermont



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