

March 4, 2021

The Hon. Jorge O. Elorza
Mayor

Ricky Caruolo
General Manager

Mrs. Luly Massaro, Commission Clerk
RI Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Dk 4994; Technical Session on Renewable Energy - Record Requests

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Dear Mrs. Massaro:

Attached, please find an original and nine copies of Providence Water's responses to the Commission's record requests from the Technical Session on Renewable Energy on February 11, 2021. An electronic copy has been provided to the service list.

Thank you for your attention to this matter.

Sincerely,

Mary L. Deignan-White
Division Manager-Finance

cc: service list(via email)

MEMBER

Rhode Island Water Works Assn.
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RIPUC DK. 4994
**PUBLIC UTILITIES COMMISSION RECORD REQUESTS FROM
TECHNICAL SESSION ON RENEWABLE ENERGY
February 11, 2021**

RR-1 In setting the rates in this Docket (4994), did Providence Water account for any increase in renewable energy charges on its electric bills?

RESPONSE: PW assumed a 2.00% annual general increase in electrical utility costs, which included all electrical utility bill components, and was meant to cover all increase in costs over the course of the contract.

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**PUBLIC UTILITIES COMMISSION RECORD REQUESTS FROM
TECHNICAL SESSION ON RENEWABLE ENERGY
February 11, 2021**

RR-2 Provide a redacted version of the opening presentation.

RESPONSE: The redactions have been applied. Please see attached.



Tech Session RR-2

Providence Water Supply Board 100% Renewable Energy Goal

February 11, 2021

Julian Dash
Managing Partner
Clean Economy Development, LLC
225 Dyer Street, 2nd Floor
Providence, RI 02903
jdash@cleaneconomydevelopment.com
401.484.1570



Providence Water 100% Renewable Background

Overview

- PW has long been a steward of the environment:
 - Environmental protection ensures the long-term protection of PW's water quality.
 - Climate change poses long-term negative impacts on PW's watershed, forest and water quality.
 - PW sees the reduction and elimination of the use of fossil fuels as critical in addressing the negative impact climate change poses to the environment and water quality.
- PW has undertaken a multitude of "green" energy measures to address this, including:
 - Lighting upgrades, variable frequency drives, motors, and low-water-consumption fixtures;
 - Addition and use of electric vehicles and charging stations.
 - Renewable energy initiatives (detailed below).

Renewable Energy: On-Site

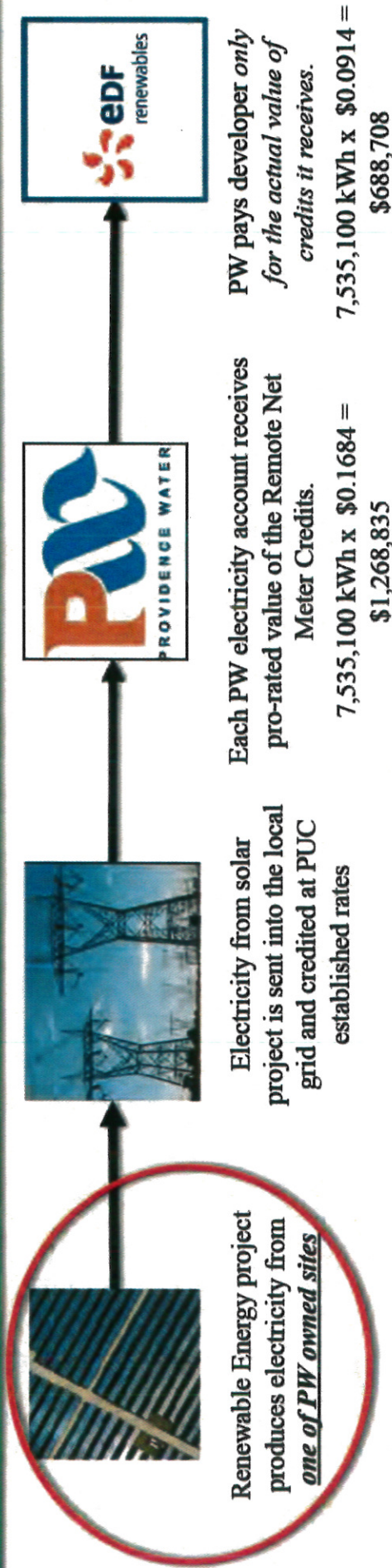
- PW commissioned an independent consultant to identify PW locations that could host on-site solar PV:
 - Of all possible sites, PW's Central Operations Facility ("COF") identified as greatest opportunity.
 - January 4, 2018: PW commissioned its 497 kW, behind-the-meter, rooftop solar PV system.
 - System produces 768,924 kWh annually and covers about 50% - 60% of PW's COF use.

Renewable Energy: Remote Net Metering

- COF solar only provides 9% of PW's *total* electricity use.
- With that, PW explored remote net metering as an option to reach its 100% renewable energy goal.



Providence Water 100% Renewable Remote Net Metering



Renewable Energy project produces electricity from one of PW owned sites

Electricity from solar project is sent into the local grid and credited at PUC established rates

Each PW electricity account receives pro-rated value of the Remote Net Meter Credits

PW pays developer only for the actual value of credits it receives.

$$7,535,100 \text{ kWh} \times \$0.1684 = \$1,268,835$$

$$7,535,100 \text{ kWh} \times \$0.0914 = \$688,708$$

PW Savings: \$1,268,835 - \$688,708 = \$580,127

Other (existing) Remote Net Meter Projects

- | | | |
|----------------------------------|---------------------------------|--------------------------------|
| City of Central Falls | Town of Scituate | Pawtucket Housing Authority |
| City of East Providence | Town of West Warwick | West Warwick Housing Authority |
| City of Providence | RI Airport Corporation | Brown University |
| Town of North Smithfield | RI Convention Center | Johnson & Wales University |
| South Kingstown Solar Consortium | RI Public Transit Authority | University of Rhode Island |
| Town of North Kingstown | Narragansett Bay Commission | Greater Providence YMCA |
| Town of North Providence | Quonset Development Corporation | Private Organizations (many) |
| Town of North Smithfield | Central Falls Housing Authority | |

PW's Unique Opportunity

PW identified this as one of the greatest economic opportunities available to pursue renewables. Because PW owns significant land, where there is limited to no commercial use viability, an appropriately sited renewable energy project is a great option. By utilizing PW owned land, it eliminates 3rd party land costs for renewable energy developers, which results in a higher value proposition (ex: net meter pricing) to PW.



Providence Water 100% Renewable Request for Proposal: Process and Selection

RFP Process

- June 2016: Initial solar study complete.
- January 2018: COF Solar facility operational.
- April 2018: Remote Net Meter RFP Issued (Pre-bid: May 3-4; Questions due: June 8).
- 2018: Responses due/received:
 - 8 Developer responses (7 solar; 1 hydro).
 - 22 options provided (ex: fixed/ discount pricing, RECs included/excluded, etc.).
- August 2018: Technical and Financial Analysis complete.
- April 2020: Contract Signed.
- August 2020: Project Operational.

Selected Developer: EDF Renewables

- A Full-Service Renewable Energy Project Developer.
 - Local subcontracting for key components (electrical, civil, etc.)
- 2,000+ solar projects nationwide across multiple customer segments (including water + utilities).
- Strong references with reputation for completing projects on time.
- Strong financial capacity.
- Strong Project proposal with solid design, timeline, performance guarantees and operational plan.
- Only respondent offering both a fixed rate contract with the option to retain the RECs.
- PW Board of Directors recently extended the contract an additional 10 years, increasing lifetime savings to over \$40M.

Key Contractual Provisions

- Early termination protections.
- PW only pays for actual credits received.
- 90% Production Guarantee.
- On-going insurance requirements; protection against failure, bankruptcy;
 - Includes a \$3M payment and performance bond in place through term.
- Flexibility in contract to purchase additional future credits if needed.
- \$3M bond includes reserve for committed decommission plan at the end of the project life.



Providence Water 100% Renewable Monitoring and Accounting

PW receives Pine Hill solar invoice from National Grid
(production report).

nationalgrid ELECTRIC BILL

www.nationalgridus.com
CUSTOMER SERVICE
1-800-323-3223
CHIEF OF ACCOUNTS
1-888-211-1313
1-800-640-1595
POWER OUTAGE OR DOWNED LINE
1-800-485-1312
CORRESPONDENCE ADDRESS
PO Box 960
Northborough, MA 01532-0960
PAYMENT ADDRESS
PO Box 11739
Newark, NJ 07101-4739

DATE BILL MADE
Dec 16, 2020

SERVICE FOR
PROVIDENCE WATER SUPPLY
MICHELLE WAY LOT 4,
SOLAR
JOHNSTON RI 02919

BILLING PERIOD
Nov 12, 2020 to Dec 14, 2020

ACCOUNT NUMBER
██████████

NO PAYMENT DUE
No payment due

ACCOUNT BALANCE

Previous Balance -23,924.04
Payment Received -0.00
Balance Forward -23,924.04
Current Charges -51.40
Credit Balance ▶ -23,972.56

SUMMARY OF CURRENT CHARGES

DELIVERY 23,972.56
SUPPLY - OTHER CHARGES 0.00
TOTAL -23,972.56

Electric Service
Distributions

Total Current Charges -23,972.85

Total Current Charges \$23,972.85

Total Current Charges \$51.40

PAGE 1 of 2

RNM credits show up on PW consolidated utility bills
(see below).

nationalgrid

SERVICE FOR
PROVIDENCE WATER SUPPLY
125 DUPONT DR, **SOLAR**
PROVIDENCE RI 02907

ACCOUNT NUMBER
271444-85017

NO PAYMENT DUE
NO payment due

Supply Services
CONSTITUTION
ENERGY INC
1221 LAMAR ST.
SUITE 700
HOUSTON TX 77030
ACCOUNT NO 10160184

Electricity Supply
0.0781 x 91116 kWh
6,693.93

Gross Earnings Tax
0.04166667 x 6,693.93
286.91

Total Supply Services
\$ 7,982.84

Other Charges/Adjustments
Paperless Billing Credit -0.37
Gross Earnings Tax 260.07
Transfer of Net Missing Credit -3,216.37

Total Charges by Account
2,864.20
\$ 4,362.89

PAGE 3 of 3

AEP invoices PW for RNM credits produced and delivered by
Pine Hills solar at contract rate.

nationalgrid

INVOICE
PINE HILL SOLAR PARTNERS, LLC
STATEMENT OF SCHEDULED TRANSACTIONS
WITH
PROVIDENCE WATER SUPPLY BOARD OF THE CITY OF PROVIDENCE RHODE ISLAND

INVOICE DATE: 12/28/20
PAYMENT DUE DATE: 12/31/21
INVOICE NUMBER: 437-21281445

INVOICE PERIOD:
8/1-Nov-2020 30-Nov-2020

GENERATOR
8,119.100

Total Sales

METHOD OF PAYMENT
Check or Wire Transfer To: ██████████
Please Send Checks To: ██████████

8142.09
8142.09

PW verifies (via 3rd party) actual RNM value received and
accuracy of AEP invoices.

nationalgrid

SERVICE FOR
PROVIDENCE WATER SUPPLY
WATER SUPPLY BOARD
125 DUPONT DR, **SOLAR**
PROVIDENCE RI 02907

ACCOUNT NUMBER
271444-85017

NO PAYMENT DUE
NO payment due

Supply Services
CONSTITUTION
ENERGY INC
1221 LAMAR ST.
SUITE 700
HOUSTON TX 77030
ACCOUNT NO 10160184

Electricity Supply
0.0781 x 91116 kWh
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PAGE 3 of 3



Providence Water 100% Renewable REC Management

PW receives monthly reporting via 3rd party:

- System production and delivery.
- Invoice verification.
- REC production and cumulative tracking against use to determine PW's position with 100% renewable energy goal.
- System performance vs. guarantee (ex: 90%).

PW's NEPOOL account:

- Retire REC's as needed.
- Trade (sell) excess RECs (in coordination with Broker).
- Purchase of RECs (in the event of shortfall) done outside of NEPOOL account, but still accounted for in monthly reporting.

Account #	Account Name	NMC Allocation	NMC	WVS Generated	WVS	REC Calculation	NMC Retired	NMC	NMC Variance	AEP Issued	AEP	PW Settings	PW
		Per Hour		Per Hour		Per Hour				Per Hour		Per Hour	
1231 Depot Dr, Providence, RI 02907		12321-10004	2.42%										
FRUIT HILL AVE, POLETA, WASHINGTON, RI 02911		80328-34009	0.09%										
187 GREENVILLE AVE., JOHNSTON, RI 02939		01915-69008	0.09%										
HURONG RD POLE IS, CRANSTON, RI 02909		00960-21001	0.16%										
1533 MINERAL SPRING AVE, CENTERVILLE, RI 02904		12794-37009	0.16%										
36 STAMLINE WAY RIGHT, CRANSTON, RI 02921		14776-18001	1.21%										
1000 WASHINGTON ST, WASHINGTON, RI 02907		14776-18001	0.23%										
1400 WASHINGTON ST, WASHINGTON, RI 02907		14776-18001	0.23%										
1400 WASHINGTON ST, WASHINGTON, RI 02907		14776-18001	0.23%										
CARRIAGE WAY LOT 2A, PRESSURE STATION, WASHINGTON, RI 02919		20726-89004	0.07%										
799 PLAINFIELD PKBL, POLE 151, NORTH SCITUATE, RI 02957		20795-70013	0.09%										
175 DEPONT DR., "SOLAR" PROVIDENCE, RI 02907		27144-68017	13.44%										
30 SCARALIA RD POLE-95, CRANSTON, RI 02921		28230-61009	0.01%										
1000 WASHINGTON ST, WASHINGTON, RI 02907		14776-18001	0.23%										
1400 WASHINGTON ST, WASHINGTON, RI 02907		14776-18001	0.23%										
AUDUBON ST POLE 1A, WASHINGTON, RI 02919		17796-22006	1.09%										
605 GREENVILLE AVE, WATER TANK, JOHNSTON, RI 02919		51515-93000	0.30%										
HOOVER ST POLE 9, WEST WARWICK, RI 02891		53514-69009	0.63%										
ATWOOD AVE POLE 17F, JOHNSTON, RI 02919		5371-46007	2.37%										
MELROY IN PUMP POLE A, CRANSTON, RI 02920		64204-56002	22.29%										
1000 WASHINGTON ST, WASHINGTON, RI 02907		14776-18001	0.23%										
SCITUATE AVE ROAD POLE IS, CRANSTON, RI 02921		72901-46002	12.77%										
CHILLA LN POLE A, CRANSTON, RI 02920		79601-24004	4.13%										
ELMORE AVE, POLE 10 NORTH PROVIDENCE, RI 02911		87907-80001	0.32%										
RIEGER RD POLE 1A, ESMOND, RI 02917		88794-60001	0.29%										
BATH ST, PROVIDENCE, RI 02908		90031-05008	16.94%										
125 Depot Drive, Providence, RI 02907		83302-11001	0.07%										
Total			100.00%										



Providence Water 100% Renewable System Sizing

System Sizing within § 39-26.4-2.(5)

§39-26.4-2.(5) "Eligible net-metering system" means a facility generating electricity using an eligible net-metering resource that is reasonably designed and sized to annually produce electricity in an amount that is equal to, or less than, the renewable self-generator's usage at the eligible net-metering system site measured by the three-year (3) average annual consumption of energy over the previous three (3) years at the electric distribution account(s) located at the eligible net-metering system site".

§39-26.4-2.(7) "Excess renewable net-metering credit" means a credit that applies to an eligible net-metering system or community remote net-metering system for that portion of the production of electrical energy beyond one hundred percent (100%) and no greater than one hundred twenty-five percent (125%) of the renewable self-generator's own consumption at the eligible net-metering system site or the sum of the usage of the eligible credit recipient accounts associated with the community remote net-metering system during the applicable billing period.

- PW Schedule B Submission (3-year average): 7,833,106 kWh
- PW (Pine Hills) solar production estimate at 100%: 8,521,100 kWh
- At 100%, Pine Hills Solar production will provide 108.78% of PW's utility grid use and 97.90% of its overall consumption.
- At 90%, Pine Hills Solar production will provide 97.90% of PW's utility grid use and 89.15% of its overall consumption.
- PW also anticipates increased usage, including but not limited to, the acquisition of Johnston Water (230,000 kWh).
- With a 90% performance guarantee, PW believes the system is sized "reasonably designed and sized" in an amount equal to or less than PW's annual consumption over the previous 3 years.
- National Grid conducted their own annual production estimate of the Pine Hills solar project, calculated at 7,050,389.
 - At 90%, Pine Hills Solar production will provide 81.01% of PW's utility grid use and 73.77% of its overall consumption.
 - At 100%, Pine Hills Solar production will provide 90.01% of PW's utility grid use and 81.96% of its overall consumption.
 - National Grid has deemed that the project size "does not exceed its three-year average annual usage of 7,833,106 kWh, as required by R.I. Gen. Laws § 39-26.4-2.(5), making the project eligible."

Scenario	3-Year Average Utility Use	COF Solar Production	3-Year Average Consumption	Pine Hills Production @ 100%	Pine Hills Production @ 90%
EDF Production Estimate	7,833,106	768,924	8,602,030	8,521,100	7,668,990
National Grid Production Estimate	7,833,106	768,924	8,602,030	7,050,389	6,345,350

Pine Hills		Pine Hills	
% of Utility Use @ 100% Production	% of Consumption	% of Utility Use @ 100% Production	% of Consumption
108.78%	99.06%	90.01%	81.96%

Pine Hills		Pine Hills	
% of Utility Use @ 90% Production	% of Consumption	% of Utility Use @ 90% Production	% of Consumption
97.90%	89.15%	81.01%	73.77%



Providence Water 100% Renewable Rhode Island 100% Renewable by 2030

- January 2020: Governor Raimondo signs E.O. setting a goal to meet 100% of RI's electricity demand with renewable energy by 2030.
- December 2020: Rhode Island's Office of Energy Resources (OER) and the Brattle Group prepared a first report that outlines a high-level economic analysis to meet this goal. Policy recommendations in this report include:
 - Increase the state's Renewable Energy Standard to 100%
 - Extend Least Cost Procurement for Energy Efficiency
 - Continue support for utility-scale and local renewable energy developments

Potential Issue

- If Rhode Island realizes 100% of its electricity demand with renewable energy by 2030, it could be argued that this might result in a double purchasing or "counting" of renewable energy for entities (like PW) who own their own renewable energy generation (and/or the associated RECs).

PW Response

- PW plans to work with stakeholders in the development and implementation of policies that will assist Rhode Island in achieving its own 100% renewable energy goal, while not inadvertently resulting in policies that cause PW to obtain renewables "twice over."
- The State's 100% Renewable Energy report identifies the importance of addressing this within its policy-development framework.
- Excerpts from the report acknowledging projects and initiatives, like PW's 100% renewable energy projects include:
 - *"To identify the full extent of Rhode Island's path to 100% renewables, as shown in Figure 3 below, we are not accounting for future additions from existing statutory programs (e.g. Renewable Energy Growth) beyond those resources already committed to, but not yet online. We acknowledge that these programs are likely to continue (in some form) throughout the decade and will contribute to closing the gap by 2030".*
 - *"In designing a 100% by 2030 RES, we should also seek methods by which Rhode Island might retain, for statewide RES compliance, all of the RECs procured through existing policy and programmatic channels (e.g. through long-term contracts and the Renewable Energy Growth Program), as well as those RECs produced from ratepayer investment in net metered projects. All of these RECs, which are ultimately paid for by electric distribution ratepayers, should be retired on their behalf to support compliance with the 100% RES goal".*

PROVIDENCE WATER SUPPLY BOARD
RIPUC DK. 4994
**PUBLIC UTILITIES COMMISSION RECORD REQUESTS FROM
TECHNICAL SESSION ON RENEWABLE ENERGY
February 11, 2021**

RR-3 Please update Page 7 of the opening presentation to change the reference to “systems” to reflect “Pine Hill Solar” for clarification purposes.

RESPONSE: The clarification has been made. Please see page 7 of RR-2 attachment.

PROVIDENCE WATER SUPPLY BOARD
RIPUC DK. 4994
**PUBLIC UTILITIES COMMISSION RECORD REQUESTS FROM
TECHNICAL SESSION ON RENEWABLE ENERGY
February 11, 2021**

RR-4 Demonstrate that the RECs generated by Providence Water's COF solar project are being retired voluntarily as opposed to being retired automatically by letting them expire in the system.

RESPONSE: PW contacted its rooftop solar monitoring agent DayMark, who informed PW that they were retiring the RECs pursuant to the NEPOOL retirement guide for retiring RECs for "General Purposes". This process is slightly different than a "voluntary action," as outlined by the NEPOOL GIS User Guide. Moving forward, PW will establish its own sub-account in its NEPOOL portal and will retire RECs (as needed) through this voluntary retirement process. This will continue on an on-going basis, and will be done as part of its on-going renewable energy management contract.

A screenshot of this transaction is attached to this update.

Trading Period	2020 - Q2 10/15/2020 to 12/16/2020	2020 - Q3 - Open 1/15/2021 to 3/16/2021	2020 - Q4 4/15/2021 to 6/16/2021
Account Summary			
MSS Data & Manual Generation Tools			
Generation			
Imports			
Supply MWh	1,045,000		
Load			0
Exports	0		0
Demand MWh			
Account Activity			
Transferable	1,045		0
Reserved	1		0
On Bulletin Board	0		0
Banked	416		0
In Subaccounts	0		0
Account Totals			
Certificates Total	1,462		0
My requested certificates			
Subaccounts Summary			
SubAccount ID	Providence Water - REC Retirement	RI	State
36757			Obligations
			0
			Certificates
			0

- Create New Subaccounts
- View Subaccounts
- Assign Obligations

PROVIDENCE WATER SUPPLY BOARD
RIPUC DK. 4994
**PUBLIC UTILITIES COMMISSION RECORD REQUESTS FROM
TECHNICAL SESSION ON RENEWABLE ENERGY
February 11, 2021**

RR-5 Development of a policy that will set forth a Board approval policy for when Providence Water will sell excess RECs.

RESPONSE: The development of this policy is underway. Once finalized, PW will provide it to the RIPUC and the Parties.

PROVIDENCE WATER SUPPLY BOARD
RIPUC DK. 4994
**PUBLIC UTILITIES COMMISSION RECORD REQUESTS FROM
TECHNICAL SESSION ON RENEWABLE ENERGY
February 11, 2021**

RR-6 Please provide the renewable energy disclosure form provided to PW by Constellation.

RESPONSE: Please see attached.

Disclosure Label

Constellation NewEnergy, Inc.

Electricity suppliers are required by the Rhode Island Public Utilities Commission to provide customers with a disclosure label. This label enables you to look at the energy sources and air emissions of the power used to serve your needs.

Electricity Facts

Power Sources

Demand for this electricity product in the period of 7/1/19-6/30/20 was assigned generation from the following sources:

Power Source	Resource Mix
Biomass	4.78%
Coal	0.22%
Diesel	0.42%
Digester Gas	1.49%
Efficient Resource	0.00%
Energy Storage	0.01%
Fuel Cell	0.00%
Hydroelectric/Hydropower	6.36%
Jet	0.01%
Import Power	0.00%
Landfill gas	0.00%
Municipal Solid Waste	0.14%
Natural Gas	34.44%
Nuclear	17.98%
Oil	4.01%
Solar Photovoltaic	3.26%
Trash-to-energy	0.14%
Wind	8.62%
Wood	0.07%
System Mix	18.06%

Air Emissions

Air emissions from the electric power resources used to serve Constellation's customers are compared to the New England regional average air emissions for all power resources in the period of 7/1/19- 6/30/20.

Air Emissions	Pounds per MWh	Air Emissions as a % of NEPOOL System Mix
Carbon Dioxide	693.09	90.75%
Carbon Monoxide	0.71	107.78%
Mercury	0.00	4.57%
Nitrogen Oxides	0.73	93.59%
Particulates	0.20	90.33%
Fine Particulates	0.21	99.97%
Sulphur Dioxides	0.49	113.90%
Organic Compounds	0.08	218.42%

Notes:

1. Electricity customers in New England are served by an integrated power grid, not particular generating units. The above information is based on the most recently available information in the NEPOOL Generation Information System.
2. You may call Constellation at 844-636-3749 or the Rhode Island Public Utilities Commission at 401-941-4500 for additional information.

PROVIDENCE WATER SUPPLY BOARD
RIPUC DK. 4994

**PUBLIC UTILITIES COMMISSION RECORD REQUESTS FROM
TECHNICAL SESSION ON RENEWABLE ENERGY
February 11, 2021**

RR-7 Please clarify whether Providence Water will be allowed to opt-out of the Providence Community Choice Aggregation proposal, or whether Providence Water's participation will be controlled by the City. The concern here is that if Providence Water is in the Community Choice Aggregation Plan and the City of Providence elects the 100% renewable option, Providence Water could effectively be 200% renewable.

RESPONSE: In addressing this question, there are three components of significant applicability:

1. PW initial qualification and enrollment into the Providence Community Choice Aggregation (CCA) contract.
2. PW's ability to opt-out.
3. PW's exposure to increasing percentages of renewable energy being provided under a CCA contract.

1. Initial Qualification

While PW has the right to opt-out of the Providence CCA contract (see #2), it is important to note that, PW (and its electricity accounts) would not qualify for the automatic opt-in or enrollment into the contract. As specified in the CCA plan "Initial Consumers" for the contract are:

"Initial consumers are those consumers in applicable classes on Standard Offer Service with National Grid that are automatically enrolled in the Program, unless they choose to opt-out".

Because all of PW's electric accounts are currently being served by a competitive supplier (Constellation), PW's accounts would not qualify as eligible initial consumers and therefore would not be automatically enrolled in the program. Enrollment would have to be made by PW proactively requesting participation through the opt-in process.

This determination is further clarified in the Providence CCA Plan as it describes "Applicable Customers:"

"Applicable Consumers: Applicable Consumers shall include consumers of electricity located in Applicable Classes within the geographic boundaries of the municipality who are (1) Standard Offer Service consumers; (2) Standard Offer Service consumers who have indicated that they do not want their contact information shared with competitive suppliers for marketing purposes; or (3) consumers receiving Standard Offer Service plus an optional renewable energy product that allows concurrent enrollment in either Standard Offer Service or competitive supply. The following consumers shall be excluded as Applicable Consumers: (1) Standard Offer Service consumers who have asked that National Grid not enroll them in competitive supply; (2) Standard Offer Service consumers

PROVIDENCE WATER SUPPLY BOARD
RIPUC DK. 4994

**PUBLIC UTILITIES COMMISSION RECORD REQUESTS FROM
TECHNICAL SESSION ON RENEWABLE ENERGY
February 11, 2021**

enrolled in a green power product program that prohibits switching to a competitive supplier; and (3) consumers receiving competitive supply service”.

Because PW’s accounts are currently being serviced by a competitive supplier, they do not qualify as initial eligible accounts to be enrolled into the CCA contract automatically, nor does PW (or its accounts) qualify as “Applicable Consumers.” As such, the matters of opt-out and/or exposure to renewable energy contract percentages would not be applicable.

2. Ability to opt-out

Based on a review of the proposed Providence Community Choice Aggregation Plan, PW will have the right to opt-out, if that action is necessary. Throughout the CCA Plan and its filing, the City of Providence and its Consultant have clearly stated that the CCA is completely optional for Eligible Customers (meaning there are both options to “opt-out” and “opt-in”). As specifically stated in the most recently filed Revision to Electricity Services Agreement:

“Eligible Consumer Opt-Out: Participating Consumers are free to opt-out of the Program utilizing established EDI drop protocols. Participating Consumers are to provide five (5) days notice to the Competitive Supplier of such termination. There are no fees or charges for Participating Consumers to opt-out or terminate service”.

3. Exposure to increasing percentages of renewables in CCA contract

In the unlikely event that PW accounts are enrolled in the CCA, PW will have CCA contract provisions and measures available to ensure that the amount of renewable energy that is received through the CCA competitive supply does not exceed the current RES mandated amount that all utility customers receive (including PW with its existing Constellation Energy competitive supply contract).

Specifically, the CCA program states that it will offer four (4) electricity supply products to consumers:

- a) Standard Product: A product that is “expected to include 10% renewable energy above the Renewable Energy Standard (“RES”).
- b) Basic: A product that offers the same amount of renewable energy offered by National Grid’s Standard Offer product.
- c) Local Green 50%: A product that provides more electricity generated from new, renewable energy resources than is offered by Local Green, but not at the 100% level.
- d) Local Green 100%: A product that offers up to a 100% renewable energy option.

PROVIDENCE WATER SUPPLY BOARD
RIPUC DK. 4994
**PUBLIC UTILITIES COMMISSION RECORD REQUESTS FROM
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February 11, 2021**

With these options, and in the event PW were enrolled in the Providence CCA, PW would opt for the Basic plan, which would provide only the amount of renewable energy currently required by the state RES, and this would represent no change from, or impact to, PW's existing renewable energy strategy.