

Massaro, Luly (PUC)

From: Jamie Rhodes <jamie.rhodes@goodenergy.com>
Sent: Monday, May 24, 2021 1:24 PM
To: WilsonFrias, Cynthia (PUC)
Cc: Massaro, Luly (PUC); patrick@goodenergy.com; stefano@goodenergy.com; philip.carr@goodenergy.com; Asouthgate@providenceri.gov; Lbamberger@providenceri.gov; Andrew.marcaccio@nationalgrid.com; Jennifer.hutchinson@nationalgrid.com; Juliana.Griffiths@nationalgrid.com; Joanne.scanlon@nationalgrid.com; Josh.Pasquariello@nationalgrid.com; Simpkins, Mark (DPUC); Wold, Leo (DPUC); Bell, John (DPUC); Munoz, Joel; Hogan, Margaret (DPUC); dmacrae@riag.ri.gov; Mfolcarelli@riag.ri.gov; Nault, Alan (PUC); Bianco, Todd (PUC); Harrington, John (PUC); Ucci, Nicholas (DOA); Steven.greco@nexteraenergy.com; Kearns, Christopher (DOA); Trietch, Becca (DOA); Cleveland, Nathan (DOA); Gill, Carrie (DOA); Vitali, Albert (DOA); rzarnetske@southkingstownri.com; mikeursillo@utrlaw.com; amygoins@utrlaw.com; phervey@barrington.ri.gov; tdeller@centralfallsri.us; Matt Jerzyk; Hagopian, Jon (DPUC)
Subject: Re: [EXTERNAL] : Re: Community Electricity Aggregation Plans - Dockets 5042, 5047, 5061 & 5062

My apologies for taking a bit of time to get back on this. Hopefully there is still sufficient time to consider this prior to Wednesday's Open Meeting. As mentioned, we can have folks available for followup questions if necessary.

Without addressing the individual items included in the MA standards, almost all of the requested information is already held by the utility, including number of eligible customers, enrolled customers, supply rates, etc. Conceptually, it would be more efficient for them to provide this data as needed rather than having aggregations request data from the utility, compile the data for administrative reports, and then submit it. At each step is a possibility for error and increased administrative costs. Working with the utility could lead to standardization of data and reports, decreasing their administrative costs along with aggregators.

For that reason, my request is that the Commission open a rulemaking process to establish a formal reporting requirement. Since this is not a required element in the statute, it should not delay Wednesday's meeting and can be resolved prior to the end of the first program year. This would allow a more thorough vetting of what information is stored with what entity and who is best suited to providing it to the Commission.

However, should the Commission proceed with establishing an annual reporting requirement on Thursday, our detailed comments on the MA rule are as follows:

- The level of detail expressed in subsection 9 for education and outreach efforts is overly detailed and onerous. We would ask the Commission to determine its purpose in requiring reports that include education and outreach information, and tailor the report accordingly. I've included our most recent report for Medford, MA as a sample.
- Beginning on page 9 are copies of each notification letter that was sent out. This mandate includes copies of letters, which we're already approved by the DPU, each time a sweep is done or change in utility rates for residential or industrial customers. As you can see, it leads to a lot of pages where it is hard to identify what the actual changes are. Instead of requiring annual copies of each version of the letter, this could be simplified if the aggregation program provided updated letters anytime they substantively change, not when the utility rates listed are updated over time. Beginning on page 21, the DPU mandates screenshots of all program web pages.

- An alternative would be to require the program website to be up-to-date, as screenshots are simply an administrative burden with little to know programmatic purpose. Meeting notices and minutes differ greatly across communities, and at times do not capture informational presentations since the requirement is to notice agendas and keep records of decisions made.
- I have also included a completed required spreadsheet. Some information, e.g. average number of customers in the municipality by rate class, is simply information that is not readily available to the aggregation. In this example, it was left incomplete as it was not made available prior to the reporting deadline. It seems unnecessary to have this information come from the utility through the aggregation to the Commission, when requesting the information from the utility directly would be more efficient.
- The product information tab is duplicative of the energy source disclosure label that we have worked on.
- For reporting opt-out information, neither the aggregation or the supplier knows whether someone opted-out to an alternative supply, or if they left the municipality. The only information we can accurately provide is the number of notices we sent and the number of participating customers. Any other information as to why someone opted-out or what service they have now is best obtained from other sources rather than these reports.
- Finally, we believe that the requirement to report any consumer complaints received by the municipality, consultant or supplier is overly broad, especially since it is not a requirement for non-aggregation NPP. Consumers still have the option to go to the Division or Commission to file a formal complaint. Any complaint received by the municipality, consultant or supplier which is adequately resolved should not be subject to additional reporting.

I hope this provides some insight as the Commission determines annual reporting requirements.

Jamie

On Wed, May 12, 2021 at 10:58 AM WilsonFrias, Cynthia (PUC) <Cynthia.WilsonFrias@puc.ri.gov> wrote:

Good Morning,

Thank you, Jamie for your response. If there are any reporting requirements from MA that Good Energy or a supplier has faced challenges meeting, please use this opportunity to advise the group. The same applies to Colonial.

Thank you,

Cindy

From: Jamie Rhodes <jamie.rhodes@goodenergy.com>

Sent: Wednesday, May 12, 2021 10:39 AM

To: WilsonFrias, Cynthia (PUC) <Cynthia.WilsonFrias@puc.ri.gov>

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Good Energy, on behalf of our municipal clients have no additional issues to raise.

On issue #4, Good Energy staff will be prepared to discuss any and all potential reporting requirements, and share our experience meeting the MA reporting requirements should it be helpful.

Jamie

On Mon, May 10, 2021 at 12:24 PM WilsonFrias, Cynthia (PUC) <Cynthia.WilsonFrias@puc.ri.gov> wrote:

Good Morning, Counsel,

I have reviewed these dockets and I believe they are ready for an Open Meeting decision. As I did earlier today with the Terms and Conditions (5058), attached is a list of issues, though I don't think any are contested. Please let me know if I have missed anything that has been raised by any party to this docket for consideration at an Open Meeting. Objective questions/statements only please.

Please provide a response by Wednesday, May 12, 2021.

Thanks, Cindy

Cynthia G. Wilson-Frias

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