

6. On August 23, 2020, the Commission circulated a series of proposed deadlines for this docket to those parties which have been part of other aggregation dockets, including setting a deadline of September 11 for intervention.
7. On September 4, with no objection a procedural schedule was set for this docket establishing the September 11 deadline for intervention.
8. In the interim, Good Energy has engaged in information conversations with Company regarding the proposed terms and conditions to ensure that the procedure set forth would be sufficient for the effective development and implementation program for Good Energy's existing clients.
9. Good Energy 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.

LEGAL STANDARD

10. 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).
11. 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

12. Good Energy's intervention in this docket is necessary and appropriate, and Good Energy's participation in the docket is in the public interest pursuant to 810-RICR-00-00-1.14(B)(2) and (B)(3).

13. Good Energy currently represents client communities referenced in paragraphs 1, 2, 4 and 5. As such, its ability to fulfill its obligations with respect to these client communities will be impacted by the effectuation of these proposed terms and conditions. As Good Energy's business operations and professional services will be dictated by these terms and conditions, intervention is necessary and appropriate to represent Good Energy's interests consistent with RICR-00-00-1.14(B)(2).

14. Good Energy's position is that the tariff, as proposed, does not provide sufficient information to the Municipal Aggregator such that it can prepare bid documents that would result in the lowest possible rates by nonregulated power producers seeking to provide electricity supply services to Good Energy's clients' aggregation programs. Provision of electricity supply services at a rate that would represent individual consumer savings in comparison with Company's supply services is in the public interest consistent with RICR-00-00-1.14(B)(3).

CONCLUSION

For the foregoing reasons, Good Energy, LLP, hereby requests that the Commission grant its motion to intervene in this proceeding as a full party.

WHEREFOR, Good Energy requests that the Commission grant its Motion to Intervene as stated herein.

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Respectfully submitted,
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