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August 1, 2022

VIA ELECTRONIC SERVICE

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

Re: DOCKET 4978 – Last Resort Service

Dear Ms. Massaro:

Please see the attached motion by Good Energy to intervene in Docket 4978 – Last Resort Service. An electronic copy of this letter and the motion have been sent to the Service List, and ten (10) paper copies shall follow by mail.

Please let me know if you have any questions regarding this submission. Thank you for your consideration.

Sincerely,



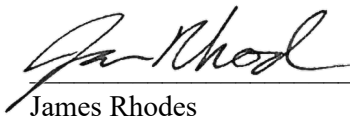
James G. Rhodes
Counsel for Good Energy, L.P.

Enclosures

cc: Docket 22-10 EL Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below. Ten (10) paper copies shall be sent to the Commission and are available to other parties upon request.



James Rhodes

8/1/2022

Date

**Docket No. 4978 – Narragansett Electric Co. d/b/a Rhode Island Energy – 2021
Last Resort Service Procurement Plan
Service List updated 7/19/2022**

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**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

2021 LAST RESORT SERVICE (LRS) : DOCKET NO. 4978
PROCUREMENT PLAN :

MOTION TO INTERVENE

Good Energy, LLP (“Good Energy”) hereby respectfully requests that the Public Utilities Commission (“Commission”) grant Good Energy’s intervention in the above-referenced docket pursuant to 810-RICR-00-00-1.14. The reasons for intervention are set forth in this Motion to Intervene (“Motion”). Based upon the procedural conference of July 27, 2022, then parties to the docket and those intending to intervene did not express objection to the intervention.

INTRODUCTION

1. On October 11, 2019, the predecessor to RI Energy, National Grid, filed its proposed 2021 Last Resort Service (“LRS”) Procurement Plan.
2. Within this docket, multiple updates to this procurement plan have been provided, such that the procurement plan for electricity supply services was set through September 30, 2022.
3. On July 21, 2022, RI Energy filed its proposed LRS rates for residential and commercial customers to begin October 2022 and run through March 2023.
4. Good Energy is the consultant to seven (7) municipalities who either have approved aggregation plans or their plans are currently under review by the Commission. See RIPUC Dockets 5042, 5047, 5061, 5062, 5169, 5212, and 22-10-EL.
5. The above-referenced aggregation plans provide an alternative default electricity supply service to Last Resort Service.
- 6.

LEGAL STANDARD

7. 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).

8. 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

9. Good Energy’s intervention in this docket is appropriate, as its interests in this docket are not adequately represented by existing parties.

10. Good Energy’s municipal clients are seeking to launch their aggregation programs in order to provide alternative supply options that have competitive pricing, price stability, and help meet climate related goals.¹

11. At the time of launch for each of these programs, eligible customers will be automatically enrolled in the aggregations’ default electricity supply product unless those customers choose to opt-out before the program launch, or they exercise their opt-out rights after the program launches.

12. When communicating program launch to eligible customers, each will receive direct communication from the aggregation program indicating not just the program’s default supply rate but also the Last Resort Service rate as well as the offered rates for optional program

¹ Each of the communities covered in the dockets listed in paragraph 4 have placed different value and priority on each of these goals.

products that may contain more or less renewable energy than the program's default supply option.

13. By listing Last Resort Service in this way, it becomes the price against which customers will compare the rate of the aggregation supply product, a significant factor when determining whether to participate in the program.

14. Any decision made in this docket to alter the Last Resort Service Rate for the October 1 to March 31 rate period will have a direct impact on the ability of these communities to meet the conditions that have been set to launch their programs.

15. Additionally, the Last Resort Service rate will have a significant impact on the number of customers that choose to opt-out of the program altogether.

CONCLUSION

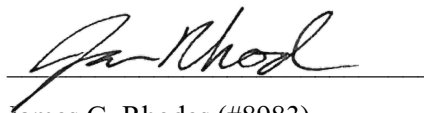
For the foregoing reasons, Good Energy, LLP, hereby requests that the Commission grant its motion to intervene in this proceeding as a full party.

WHEREFORE, Good Energy requests that the Commission grant its Motion to Intervene as stated herein, and that it be granted a full party in this proceeding.

Respectfully submitted,

GOOD ENERGY, LLP

By its attorney,



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Dated: August 1, 2022