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July 20, 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 22-10 EL – Narragansett Aggregation Plan

Dear Ms. Massaro:

On behalf of the Town of Narragansett enclosed please find an electronic version of Town's responses to the record requests issued by the Commission in the above-referenced matter. Five (5) paper copies shall be sent to the Commission and provided to other parties upon request.

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. Five (5) paper copies shall be sent to the Commission and are available to other parties upon request.

James Rhodes

Date

Docket No. 22-10-EL – Town of Narragansett Community Choice Electricity Aggregation (CCEA) Plan
Service List updated 07/06/2022

Name/Address	E-mail Distribution	Phone
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	Todd.bianco@puc.ri.gov;	
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1-1. Page 3 of the Aggregation Plan states:

Consumers that join by opting-in include two types of consumers: a) consumers that did not become part of the Program initially because they were being served by a competitive supplier and then joined the Program; and b) consumers joining the Program after having previously opted out. Those consumers that were being served by a competitive supplier at program initiation but who later join the Program will be treated the same as new consumers – residential and small commercial consumers will receive the contracted program pricing and all other commercial and industrial consumers will pay a price based on the then-current market rates. All consumers that join the Program after having previously opted out will be offered a price based on then-current market rates rather than the standard contract price. This distinction is designed to limit any incentive for frequent switching back and forth between the aggregation program and Last Resort Service of [Rhode Island Energy].

- a) Once the Program commences, what is the term? In other words, is it indefinite or commensurate with the length of the power contract(s) and those pricing terms?
- b) If a customer opts out of the Program and then a new energy procurement is conducted, is that customer still considered opted out automatically or is there a new opt-out opportunity?

Response:

- (a) The term is intended to be commensurate with the length of the power contract and those pricing terms. If the pricing terms change during the length of the power contract, the treatment of those customers that have opted out will need to be further clarified within the Electricity Services Agreement.
- (b) Given that the statute governing aggregation programs is silent on this point, except for requiring an opt-out option not less than every two years, it is our opinion that this aspect of the program will be determined by negotiation between a supplier and the aggregation program.

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- 1-2. Given that the Rhode Island General Assembly has recently passed changes to the Renewable Energy Standard that increase the percentages required each year and will lead to a 100% renewable energy standard by 2032, has that changed the strategy or expected composition of procurement of the Optional Products?

Response:

For the initial years of the program and the corresponding ramp up in the RES, the additionality concepts underpinning the procurement of voluntary RECs are still applicable. Thus, the voluntary RECs will still be procured as a method for program participants to achieve renewable energy goals at a pace faster than that outlined by the RES. However, this does mean that there will be diminishing returns on this approach within the next decade. Good Energy has begun talking with its strategic advisors as to how aggregations can accomplish other climate related goals through its operations in order to propose to its clients' different options for how the aggregations can provide value to the municipality and its customers.

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- 1-3. The following question and answer is in the public comment section of the filing: Q. What is the annual cost to the town to administer the program? A. There are no direct expenditures by the Town for this program. Existing staff are currently overseeing the program's development and launch while working with Good Energy, who is committed to covering the costs of program development, approval, and outreach.
- a) Did any public presentation at the public meeting discuss the inclusion of the \$0.001 per kWh added to the energy charge as Good Energy's commission? If so, please provide a copy of the presentation and if not, why not?

Response:

The text of the slides used in the three presentations made to the Council over the past 15 months did not include Good Energy's commission, however, Good Energy's compensation was discussed as part of each of those presentations. Those responses can be reviewed at the following locations:

- June 7, 2021 meeting. Link available at <https://www.youtube.com/watch?v=AsmPtdO1Pos>, questions from Councilman Murray at 43:00
- March 21, 2022 meeting. Link available at <https://www.youtube.com/watch?v=JeBjQw9C0Dk>, question from Councilman Murray at 1:48:20
- May 16, 2022 meeting. Link available at <https://www.youtube.com/watch?v=1mBXCgC5Dkg> response to question from the public at 1:32:20

Additionally, the fee is described in the Plan document, made available for public review, at page 8 of 10. It is also included on the Consumer Notification letter. See Attachment 3 at page 3 of 5.

Given the Council's limited time and attention for this program, the information regarding our Commission has not been seen as the most critical issue to raise in a Council's evaluation. As noted above, the Council did raise the question and was addressed with a clear and concise answer. This has been similar to the process we have witnessed in other communities. This structure has allowed us to craft presentations that focus on the plan's goals and the program's operations.

1-4. Messrs. DeLuca and Roche explained that “The plan was brought up for consideration at the June 6, 2022, Town Council meeting where it was approved by a vote of 4-1.” (Test. at 2). What was the primary concern of the dissenting member?

Response:

The reason provided by the Council member when casting a dissenting vote was based upon the program being an opt-out rather than opt-in program, and that he had a desire for the energy market to stabilize before the Town gets involved in purchasing.

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1-5. Other than homeowners/residents' associations, what local organizations have been identified by the Town of Narragansett for conducting in person outreach to all segments of Narragansett's community, including elderly, low income, or hard-to-reach residents? The filing lists the George Wiley Center but an organization located in Pawtucket may not be the best source. What other assistance organizations are active in Narragansett?

Response:

The program intends to also coordinate its outreach and education efforts with the following organizations that provide direct services with often hard-to-reach residents:

- Narragansett Housing Authority,
- The Jonnycake Center, and
- The Galilee Mission.

1-6. The filing states: Distribute to key locations such as Public Library, Municipal Offices and [insert any other locations]. What are the other key locations?

Response:

The Program intends to post materials in the following publicly accessible locations:

- Narragansett Community Center,
- Narragansett Public Safety Building, and
- Narragansett School Dept, pending approval by the Superintendent for posting within school buildings used for public assembly.