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September 15, 2023

VIA ELECTRONIC SERVICE

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

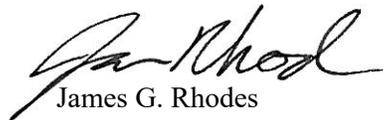
Re: DOCKET 23-25-EL – Bristol Aggregation Plan

Dear Ms. Massaro:

On behalf of the Town of Bristol enclosed please find an electronic version of Town's responses to the record requests issued by the Commission in the above-referenced matter. Paper copies are available 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 23-25-EL Service List

PUC 1-1

Request:

Based on Good Energy's experience in other municipalities' procurements and 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:

At this time, it has not. While it is expected that the default supply option in the aggregation plans will reach 100% renewable on a faster timeline than that required by the renewable energy standard, there is still a significant percentage of customers that select a supply option that does not increase renewable content.

As we collectively move closer to the 2032 requirement for 100% renewable energy, Good Energy will be engaged in discussions with municipal staff and suppliers to identify ways that the aggregation program can be utilized to further local climate related goals beyond sourcing electricity supply from renewable sources.

PUC 1-2

Request:

Based on Good Energy's experience launching community aggregation in other municipalities, what, if any, modifications in its practices have been adopted to ensure a smooth enrollment process?

Response:

Good Energy is planning to share consumer notification letters further in advance to elected and Town officials prior to them being mailed out to residents. Contemporaneous delivery, as was done during the launch of the other programs, led to avoidable confusion. These individuals often serve as a first point of contact for questions regarding the program, rather than the customer support number provided on the letters as was anticipated.

Additionally, when early notices go out, they will include dates and time for community meetings for individuals to attend to respond to questions customers may have regarding the program. For previous aggregation launches these meetings were communicated following receipt of the consumer notification letter. This led to misunderstandings that they were planned and executed in response to community questions rather than as part of an integrated communication plan.

PUC 1-3

Request:

The public comment hearing on the draft plan was held on May 24, 2023. Were any comments received? If so, please summarize and explain any response provided.

Response:

Yes, public comment was received at the hearing. The comment was primarily clarifying questions about whether and how the role of RI Energy would change as a result of this program. Good Energy attended the hearing and provided a response that explained delivery services and how those differ from supply, and that RI Energy's delivery services would continue unaffected. Additionally, Good Energy explained how the supply section of the bill would change to reflect the Town's program, supplier name and pricing.

There was additional input and feedback from the Town Council after the public questions. Additional information regarding those points are captured in the minutes of the meeting, which are available at: <https://mccmeetings.blob.core.usgovcloudapi.net/bristolri-pubu/MEET-Minutes-d41b455da2204b34ab9d6ecc811838b3.pdf>.

PUC 1-4

Request:

What was the nature of the feedback from Bristol that was adopted in the consumer notification letter and opt-out card compared to prior aggregation plans?

Response:

In developing the aggregation plan, the Town reviewed the existing consumer notification letters in previous aggregation plans. Overall, the Town wanted to see the letter adjusted such that it would present first the most useful information to the most people. This meant starting at a high level with the most critical points and then providing additional layers of detail as the reader progresses.

The Town felt the previous letters did a good job in the opening of notifying a consumer of the automatic enrollment but felt that the context for that automatic enrollment and the consumers' options were too buried and disconnected, which could lead to confusion. As a result, the opening has been revised, with the addition of three boxes at the very top that provide the three most important things the Town felt a reader should know: 1) context concisely explaining the program, 2) a notice of automatic enrollment in said program and 3) how the customer can exercise their option not to participate either now or in the future.

Additionally, the Town felt that the "Your Options" section was a bit overwhelming with three options and directions for how to access each. Addressing this, the first change was to reduce the number of options from three to two by removing "Automatically enroll in the standard product" as an option. Instead, the letter simply states the fact that by receiving the letter you are slated for automatic enrollment in the standard product. Then the consumer is then presented with a simplified two option choice: opt-out or choose an optional product. The Town felt this more accurately represented the options and was more approachable. Second, the Town chose to separate the consumer's options from the directions on how to exercise those options. They felt it was distracting to have the menu of options broken up by directions for how to exercise each, as previous versions did.

Finally, the Town opted to simplify the presentation of renewable energy. In the previous letters, renewable energy had a detailed table with rows referencing the RES, additional renewables, and totals. This was also presented in a separate table from the Product Summary. The Town felt that this approach was too detailed and cumbersome for the average consumer to engage with. As a result, the Town moved the renewable energy information into the same summary table with product pricing and highlighted the two elements it found most useful: what, if any, voluntary renewables are included and what is the total renewable energy content once those are added in. The letter maintains information about the RES in a bullet under Program Detail, so that it is available to those interested in digging further.

PUC 1-5

Request:

Please highlight the additional notification requirements for rate changes that differ from prior aggregation plans.

Response:

The Plan includes a new commitment in section VI to include in the consumer notification letter “*the expected price change schedule, whether [the consumer] will be automatically renewed at the end of the pricing term, and that the current information about the program and prices will always be available on the aggregation web site.*” The goal is to inform consumers proactively about what will happen when the current pricing period ends, as well as to empower them with instructions on how to check themselves whenever they want.

PUC 1-6

Request:

When does Good Energy anticipate launching the Bristol aggregation plan? What would be the expected first month of new rates for these customers?

Response:

The launch date is dependent upon the ability of Bristol, subsequent to PUC approval, to select a supplier to serve the program. The launch date would be determined in negotiation with that supplier. Based on previous experience, it is likely that the earliest that would be May 2024, though this is subject to clarification once discussions begin with potential suppliers.