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March 4, 2021

*VIA ELECTRONIC SERVICE  
and HAND DELIVERY*

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

**Re: Dockets 5042, 5047, 5061, & 5062 – Proposed Energy Disclosure Label**

Dear Ms. Massaro:

Enclosed please find an electronic version of the proposed Energy Disclosure Label that would serve as the template to be adapted by the by the electricity supplier for the aggregation plans contained in the above-referenced dockets.

For reference, those items in red are intended to be useful context to understand the purpose and information being provided and not included in a final version. As these were designed with the intention of serving as a template, it is to be expected that actual labels in individual programs may vary in format, layout, and other design elements.

Thank you for your attention to this submission. If there any questions, please contact me at 401-225-3441.

Sincerely,



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

Enclosure

cc: Docket 5042 Service List  
Docket 5047 Service List  
Docket 5061 Service List  
Docket 5062 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.

Paper copies are available upon request.



March 4, 2021

**Docket No. 5042 – City of Central Falls Community Choice Electricity Aggregation Plan  
Service List updated 8/13/2020**

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**Docket No. 5047 – Town of Barrington Community Choice Electricity Aggregation (CCEA) Plan**  
**Service List updated 8/13/2020**

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**Docket No. 5061– City of Providence - Community Electricity Aggregation (CEA) Plan Service List updated 1/7/21**

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**Docket No. 5062 – Town of South Kingstown - Community Choice Electricity Aggregation (CCEA) Plan**  
**Service List updated 8/27/2020**

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## Overview

- Pages 2-7 show a complete label for the Local Green 10% product
- Page 8-10 show tables showing variation with the Local Green 100% product

## Clarifying certificates over 100%

- We've adjusted language throughout section 2A to better describe voluntary purchase and purchases over 100%

## Notes on data for Actual Sources of Electricity (Table 2B-1 and 2B-2)

- Denominator for all percentages is total GIS Certificates retired. This means that:
  - Until a period ending in Q4, we may see few, if any, RES Certificates retired. We have inserted text to highlight Supplier's ability to retire certificates for a given calendar year any time through Q4.
  - We concluded that emissions cannot be negative. Emissions will be based on the sum of all certificates retired, thus 0 is the lower limit. Even in the Local Green 100% product, your excess certificates just account for more 0 emissions.
- Based on the data availability of NEPOOL GIS reports, when a program launches, we likely would produce our first quarterly report 2 quarters later
  - E.g. Q1 data is available Sept 15 per <http://www.nepoolgis.com/wp-content/uploads/sites/3/2013/11/Important-NEPOOL-GIS-Dates.pdf?x41232>
  - We would require the supplier to continue providing the quarterly report until data is available for the last quarter of their contract

**Electricity Supplier: [Insert Name]**

**Electricity Product: Local Green 10%**

This label provides the following information for the electricity product:

1. Pricing terms
2. Characteristics of electricity sources
  - a. Planned sources of electricity for each calendar year of the contract
  - b. Actual sources of electricity and air emissions for the most recent one year period

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**Section 1. Product Pricing:**

Pricing in Table 1 is effective from [MM/YY] through [MM/YY].

<b>Table 1. Product Pricing by Rate Class</b>			
<b>Product</b>	<b>Residential</b>	<b>Commercial</b>	<b>Industrial</b>
Local Green 10%	[\$[XXX]¢/kWh	[\$[XXX]¢/kWh	[\$[XXX]¢/kWh



## Section 2. Characteristics of Electricity Sources

### GIS Certificates for Electricity:

All electricity generated within the ISO New England (ISO-NE) control area and fed on to the New England grid, as well as electricity exchanged between ISO-NE and adjacent control areas, is tracked via the New England Power Pool (NEPOOL) Generation Information System (GIS). For each megawatt hour (MWh) of electricity generated within or exchanged between the ISO-NE control area, whether renewable or not, one serial-numbered, electronic GIS certificate is created. The GIS certificate represents all attributes or characteristics, such as fuel source, air emissions, location, etc. of that one MWh of electricity. The information in this Energy Source Disclosure is based on GIS Certificates obtained and retired by the Supplier.

**[If applicable:** One or more of Supplier's products contain additional attributes based on electricity that was not generated within or exchanged between the ISO-NE control area and therefore has no GIS certificate(s). For detail about these attributes please see [insert link or directions for more detail].]

### Definitions of Electricity Source Categories Used in Section 2:

**Renewable Energy Standard (RES):** the state-mandated minimum amount of GIS certificates from renewable energy. 2% may come from Rhode Island Existing Sources (RI Existing) and the remainder must come from Rhode Island New (RI New) sources. Generation for either of these categories must be located in New England or delivered into New England from New York or eastern Canada. The GIS Certificates can come from wind, landfill gas, biomass, solar, small hydroelectric (<30 MW), or anaerobic digestion generating plants. RI New sources began commercial operation after 12/31/1997. RI Existing sources began commercial operation before 1/1/1998.

**Voluntary:** GIS certificates of renewable energy in addition to the RES. The Voluntary renewable energy will be entirely from [insert definition of voluntary RECs – for Good Energy: “sources qualified as RI New sources (See RI New definition above) that are located only in New England”].

**Other Known Resources:** Any other GIS certificates for electricity obtained by Supplier from specific generating units.

**Residual Mix:** [SupplierName] may purchase electricity supply from system power contracts, not from specific generating units. System power is assigned attributes based on the mix of GIS certificates of sources found on the New England electricity grid that have not been obtained and retired by other entities, referred to as the ‘Residual Mix’. The Residual Mix will largely be non-renewable, because most GIS certificates for renewable energy are obtained to meet the RI RES (and their equivalent in other New England states) or voluntary requirements.

## Section 2A. Planned Sources of Electricity

Table 2A illustrates the electricity source categories from which the Supplier plans to obtain and retire GIS certificates for each customer in each of the calendar years of the contract.

**Table 2A. Planned GIS Certificates as Percentage of Customer Electricity Usage\***

Product	Calendar Year	Electricity Source Category				Total
		Renewable Electricity		Other Known Resources	Residual Mix	
		Renewable Energy Standard (RES)	Voluntary RI New (In addition to RES)			
Local Green 10%	2021	16%	10%	-	74%	100%
	2022	18%	10%	-	72%	100%
	2023	20%	10%	-	70%	100%

\*All percentages in Table 2A are based on customer usage. Customer usage multiplied by the percentage equals the quantity of GIS certificates planned to be obtained and retired.

**[If applicable for Product with voluntary retirement of RECs:** Any voluntary retirement of GIS Certificates from renewable sources increases demand for renewable energy. The more GIS certificates voluntarily retired, the greater the increase in demand.] **[If applicable for Product with over 100% renewable Certificates:** Because this product provides GIS Certificates for renewable energy in excess of 100% of your usage, you are increasing demand for renewable energy above your total electricity usage.]

For definitions of Electricity Source Categories in Table 2A, see Section 2.

## **Section 2B. Actual Sources of Electricity and Air Emissions**

The following tables shows the actual fuel sources of electricity supply (2B) and the resulting air emissions (2C) based on GIS Certificates obtained and retired by the Supplier.

GIS Certificate data are typically available two quarters after the close of a calendar quarter. For example, data for quarter one is available at the end of quarter three. If the contract does not have a full year (i.e. four-quarters) of data available, then the most recent quarter(s) of data for that contract are used.

**[Insert either:** Data for this contract is not yet available for tables 2B and 2C **OR** Data in tables 2B and 2C cover calendar quarter [X YYYY] through quarter [X YYYY].]

## Section 2B-1. Actual Sources of Electricity

Table 2B-1 illustrates the electricity source categories and fuels from which the Supplier has obtained and retired GIS certificates for each customer for the period identified in Section 2B.

<b>Table 2B-1. Actual GIS Certificates as Percentage of Customer Electricity Usage*</b>					
<b>Product</b>	<b>Fuel Source</b>	<b>Electricity Source Category</b>			
		<b>RES</b>	<b>Voluntary RI New</b>	<b>Other Known Resources</b>	<b>Residual Mix</b>
Local Green 10%	Solar	-	1%	-	-
	Wind	16%	9%	-	0.76%
	Nuclear	-	-	-	29.04%
	Natural Gas	-	-	-	44.00%
	Other Fuel 1	-	-	-	-
	Other Fuel 2	-	-	-	-
	Other Fuel 3	-	-	-	-
	Other Fuel 4	-	-	-	-
	<b>Sub Total</b>	<b>16%</b>	<b>10%</b>	-	<b>74%</b>
	<b>Total</b>	<b>100%</b>			

\*All percentages in Table 2B-1 are based on customer usage. Customer usage multiplied by the percentage equals the quantity of GIS certificates that have been obtained and retired. **[If applicable:** As the time period of Table 2B-1 does not end in quarter four, fuel source percentages may be higher or lower than 100% and are subject to change until the end of the calendar year. This is because Suppliers may obtain and retire GIS Certificates for a given calendar year at any time through the end of quarter four.]

For definitions of Electricity Source Categories in Table 2B-1, see Section 2. Percentages in Table 2A and Table 2B-1 may not match exactly as they may cover different time periods.

## 2B-2. Actual Air Emissions of Electricity

Table 2B-2 provides the emissions from each of the products offered and provides a comparison to the New England regional average for all power sources for the time period specified in Section 2B.

<b>Table 2B-2. Actual Air Emissions as Percentage of Customer Electricity Usage</b>			
<b>Product</b>	<b>Emission Type</b>	<b>Product Emissions (Lbs / MWh)</b>	<b>Product Emission as Percentage of Regional Average (100% = Regional Average)</b>
Local Green 10%	Carbon Dioxide		
	Carbon Monoxide		
	Mercury		
	Nitrogen Oxides		
	Particulates		
	Fine Particulates		
	Sulphur Dioxides		
	Organic Compounds		

Emissions for the product are calculated based on the emissions for the GIS Certificates the Supplier has obtained and retired. Average emissions for all power sources are calculated based on the System Mix from NEPOOL GIS, which include all GIS Certificates in the entire system. 100% is the average (baseline) emissions of the System Mix.

**[If applicable:** As the time period of Table 2B-2 does not end in quarter four, emissions for the Product and are subject to change until the end of the calendar year. This is because Suppliers may obtain and retire GIS Certificates for a given calendar year at any time through the end of quarter four.]

- **Table 2A for our Local Green 100% product**

## Section 2A. Planned Sources of Electricity

Table 2A illustrates the electricity source categories from which the Supplier plans to obtain and retire GIS certificates for each customer in each of the calendar years of the contract.

<b>Table 2A. Planned GIS Certificates as Percentage of Customer Electricity Usage*</b>						
<b>Product</b>	<b>Calendar Year</b>	<b>Electricity Source Category</b>				<b>Total</b>
		<b>Renewable Electricity</b>		<b>Other Known Resources</b>	<b>Residual Mix</b>	
		<b>Renewable Energy Standard (RES)</b>	<b>Voluntary RI New (In addition to RES)</b>			
Local Green 100%	2021	16%	100%	-	0%	116%
	2022	18%	100%	-	0%	118%
	2023	20%	100%	-	0%	120%

\*All percentages in Table 2A are based on customer usage. Customer usage multiplied by the percentage equals the quantity of GIS certificates planned to be obtained and retired.

**[If applicable for Product with voluntary retirement of RECs:** Any voluntary retirement of GIS Certificates from renewable sources increases demand for renewable energy. The more GIS certificates voluntarily retired, the greater the increase in demand.] **[If applicable for Product with over 100% renewable Certificates:** Because this product provides GIS Certificates for renewable energy in excess of 100% of your usage, you are increasing demand for renewable energy above your total electricity usage.]

For definitions of Electricity Source Categories in Table 2A, see Section 2.

- Hypothetical Table 2B-1 for our Local Green 100% product with only 1 quarter of data, in which supplier has only retired some voluntary RECs and nothing else yet (so total percentage doesn't yet match the planned percentage)

## Section 2B-1. Actual Sources of Electricity

Table 2B-1 illustrates the electricity source categories and fuels from which the Supplier has obtained and retired GIS certificates for each customer for the period identified in Section 2B.

Table 2B-1. Actual GIS Certificates as Percentage of Customer Electricity Usage*					
Product	Fuel Source	Electricity Source Category			
		RES	Voluntary RI New	Other Known Resources	Residual Mix
Local Green 100%	Solar	-	1%	-	-
	Wind	-	9%	-	-
	Nuclear	-	-	-	-
	Natural Gas	-	-	-	-
	Other Fuel 1	-	-	-	-
	Other Fuel 2	-	-	-	-
	Other Fuel 3	-	-	-	-
	Other Fuel 4	-	-	-	-
	<b>Sub Total</b>	-	<b>10%</b>	-	-
	<b>Total</b>				

\*All percentages in Table 2B-1 are based on customer usage. Customer usage multiplied by the percentage equals the quantity of GIS certificates that have been obtained and retired. **[If applicable:** As the time period of Table 2B-1 does not end in quarter four, fuel source percentages may be higher or lower than 100% and are subject to change until the end of the calendar year. This is because Suppliers may obtain and retire GIS Certificates for a given calendar year at any time through the end of quarter four.]

For definitions of Electricity Source Categories in Table 2B-1, see Section 2. Percentages in Table 2A and Table 2B-1 may not match exactly as they may cover different time periods.

- Hypothetical Table 2B-1 for our Local Green 100% product with data for a full calendar year ending in quarter 4, so total percentage matches the planned percentage

## Section 2B-1. Actual Sources of Electricity

Table 2B-1 illustrates the electricity source categories and fuels from which the Supplier has obtained and retired GIS certificates for each customer for the period identified in Section 2B.

<b>Table 2B-1. Actual GIS Certificates as Percentage of Customer Electricity Usage*</b>					
<b>Product</b>	<b>Fuel Source</b>	<b>Electricity Source Category</b>			
		<b>RES</b>	<b>Voluntary RI New</b>	<b>Other Known Resources</b>	<b>Residual Mix</b>
Local Green 100%	Solar	2%	10%	-	-
	Wind	14%	90%	-	-
	Nuclear	-	-	-	-
	Natural Gas	-	-	-	-
	Other Fuel 1	-	-	-	-
	Other Fuel 2	-	-	-	-
	Other Fuel 3	-	-	-	-
	Other Fuel 4	-	-	-	-
	<b>Sub Total</b>	<b>16%</b>	<b>100%</b>	-	-
	<b>Total</b>				

\*All percentages in Table 2B-1 are based on customer usage. Customer usage multiplied by the percentage equals the quantity of GIS certificates that have been obtained and retired. **[If applicable:** As the time period of Table 2B-1 does not end in quarter four, fuel source percentages may be higher or lower than 100% and are subject to change until the end of the calendar year. This is because Suppliers may obtain and retire GIS Certificates for a given calendar year at any time through the end of quarter four.]

For definitions of Electricity Source Categories in Table 2B-1, see Section 2. Percentages in Table 2A and Table 2B-1 may not match exactly as they may cover different time periods.