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205 Governor St.  
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January 27, 2021

*VIA ELECTRONIC SERVICE  
and USPS*

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

**Re: Dockets 5058 – Good Energy Response to National Grid’s First Set of Data Requests**

Dear Ms. Massaro:

Enclosed please find five hard copies of Good Energy’s response to National Grid’s First Set of Data Reqeusts issued on January 6, 2021.

Thank you for your attention to this submission. If there any questions, please contact me at 401-758-7288.

Sincerely,



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

Enclosure

cc: Docket 5058 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.



January 27, 2021

**Docket No. 5058 – National Grid’s Proposed Terms & Conditions for Municipal Aggregators**

**Docket No. 5059 – National Grid’s Proposed Change to Existing Terms & Conditions for NPPs**

**Service Lists updated 10/2/2020**

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## National Grid 1-1

### Request:

On October 23, 2020, the Massachusetts Department of Public Utilities (MA DPU) issued a report and order in D.P.U. 19-51 and D.P.U. 19-52 in which the MA DPU directed National Grid to provide towns/municipal aggregators with only information about eligible customers and not provide any data for ineligible customers. (see page 17 of the Report and Order).

- (a) Would Good Energy have any objections to adding language that reflects this directive into the proposed terms and conditions for municipal aggregators in Rhode Island?
- (b) If so, please explain why this directive from the MA DPU should not apply to Rhode Island? Please explain why diverging from Massachusetts on this topic would be beneficial to Rhode Island customers.

### Response:

- (a) Without having actual language available to evaluate, Good Energy believes it would object only in part to “not provid[ing] any data for ineligible customers.” This is based on distinguishing aggregate data and individual customer data. Aggregate load data should be included in the information that is provided by the utility to aggregators. Good Energy would not object to not providing individual account level data for ineligible customers as part of any eligible customer list.
- (b) To further clarify the extent to which Good Energy would consider objecting, aggregate load data for an entire community, which would include that of customers ineligible for auto-enrollment in an aggregation program, aids the development and execution of a competitive bid for supply service. Sufficiently detailed load data such that suppliers who are bidding on the program are aware of the municipality’s total load potential.

The provision of this aggregate load data is both consistent with current practice in both Rhode Island and Massachusetts. Currently, when Good Energy is selected by a community to serve as aggregation consultant, it receives a letter of authorization from the municipality to receive aggregate load data from the utility. This practice is the same as what has been undertaken in Massachusetts. Upon receiving this authorization, National Grid has provided Good Energy with aggregate load data, by rate class, for the entire community and then specifically for the load, by rate class, that represents those customers eligible for auto-enrollment into the aggregation program.

This practice is also consistent with an existing MA DPU order. In MA DPU Order 16-10 the DPU found that “it is appropriate for the distribution companies to allow municipal aggregators to access, upon request, aggregate load data for all customers by customer class so that suppliers bidding on the aggregators’ load are aware of the municipality’s total potential load.”<sup>1</sup> The provision of this data allows a supplier to understand the current and potential load of the aggregation program, resulting in more accurate and competitive pricing. The benefit of sharing this information is the potential of lower electricity supply prices for program participants.

Good Energy would object to any tariff provision that would deviate from this existing practice. Good Energy is in agreement with the policy rationale cited by the MA DPU in providing this data. Additionally, in the effort to seek operational consistency for National Grid in both states, this practice should be preserved.

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<sup>1</sup> MA DPU 16-10 at 18.