

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 5058  
In Re: National Grid's Application to Add  
Terms and Conditions for Municipal Aggregators  
Responses to the Good Energy's First Set of Data Requests  
Issued on April 8, 2021

---

Good Energy 1-1

Request:

In Section 4C of the revised Terms and Conditions filed on March 25, 2021, there is an explicit prohibition on National Grid providing the current supply rate for customers participating in a Municipal Aggregation Program to the Aggregator after the launch of the Aggregation Program. Good Energy has requested this information be included in the tariff so that the Aggregation Program does not solely rely on its current supplier to provide the data necessary to rebid the supply contract and subsequently enroll customers with a potentially new supplier. This data would allow the Aggregator to check and verify the information of their contracted supplier while also not solely relying on their data to engage in a commercial activity that may result in the termination of their contract. Additionally, given that the supply rates are selected by the Aggregator during the bidding process and that customers are customers of the Aggregation Program, the data for each participating customer's current supply rate should be made available to the Aggregation Program.

What is National Grid's justification for not including this information in the tariff? What are National Grid's concerns with respect to providing this information to the Aggregator?

Response:

The Company's Massachusetts affiliates, Massachusetts Electric Company and Nantucket Electric Company (together, "Mass. Electric") do not provide Supplier rates to Aggregators or any other third party in Massachusetts, with over 70 active municipal electric aggregations, totaling over 443,000 enrolled accounts.

The Company is of the opinion that it is not appropriate to share Supplier rates with a third party. A customer's rate is competitively sensitive information, negotiated between the customer and a given supplier. If National Grid shared that information, it would allow Supplier B to see rate information for Supplier A and give them a competitive advantage. That would be to the detriment of customers and the competitive marketplace and cannot be the desired outcome or purpose of an aggregation.

As explained in National Grid's response to PUC 1-9 issued on October 28, 2020, "The Supplier and the Aggregator have a business relationship as well as an executed Electric Service Agreement. National Grid should not be required to take action to bear the responsibility to ensure that the Aggregator receives the correct data from the active Supplier in order for the Aggregator to confirm that their financial agreement is satisfied. The burden to provide a

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 5058  
In Re: National Grid's Application to Add  
Terms and Conditions for Municipal Aggregators  
Responses to the Good Energy's First Set of Data Requests  
Issued on April 8, 2021

---

Good Energy 1-1, page 2

duplicate daily EDI file to the Aggregator, so that the Aggregator can confirm the Supplier's data, is clearly the responsibility of the Supplier rather than the utility.”

The customer's current supplier rate is confidential customer information, which the Company cannot share without the customer's consent.