

April 20, 2021

VIA ELECTRONIC MAIL

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

**RE: Docket 5058 - Application to add Terms and Conditions for Municipal Aggregators
National Grid's Reply to Colonial Power Group**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company"), attached is the Company's reply to the Supplemental Comments submitted by Colonial Power Group, Inc. in connection with the above-referenced matter.¹

Thank you for your attention to this filing. If you have any questions or concerns, please do not hesitate to contact me at 401-784-4263.

Sincerely,



Andrew S. Marcaccio

Enclosures

cc: Docket 5058 Service List
John Bell, Division
Leo Wold, Esq.

¹ Per Commission counsel's update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing followed by five hard copies filed with the Clerk within 24 hours of the electronic filing.

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID APPLICATION TO ADD TERMS AND CONDITIONS FOR MUNICIPAL AGGREGATORS :
: **DOCKET NO. 5058**
:
:

**RESPONSE OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A
NATIONAL GRID TO THE SUPPLEMENTAL COMMENTS
OF COLONIAL POWER GROUP, INC.**

The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”) hereby submits this response to the Supplemental Comments submitted by Colonial Power Group, Inc. (“Colonial”) in connection with National Grid’s Proposed Terms & Conditions for Municipal Aggregators (“Terms & Conditions”).¹

1. National Grid reiterates its objection to providing duplicate EDI transactions.

Colonial encourages the Public Utilities Commission (“PUC”) to adopt its previously suggested revision to Section 3B(11) of the Terms & Conditions. This request by Colonial requires duplicate electronic data interchange (“EDI”) transactions. In response, the Company reiterates its objection to this request and notes that its Massachusetts affiliates, Massachusetts Electric Company and Nantucket Electric Company (together, “Mass. Electric”) do not provide duplicate EDI transactions to municipal aggregators or any other third-party vendor. In support of the Company’s objection to this request, please see National Grid’s responses to PUC 1-9 filed November 13, 2020² and PUC 2-2 filed December 23, 2020.³ In the event that the PUC

¹ Proposed Revised Terms & Conditions may be accessed at: [http://www.ripuc.ri.gov/eventsactions/docket/5058-Ngrid-Revised%20TC%20\(redlined%20&%20clean\)%20\(3-24-2021\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/5058-Ngrid-Revised%20TC%20(redlined%20&%20clean)%20(3-24-2021).pdf)

² [http://www.ripuc.ri.gov/eventsactions/docket/5058-NGrid-DR-PUC1%20\(11-13-2020\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/5058-NGrid-DR-PUC1%20(11-13-2020).pdf)

³ [http://www.ripuc.ri.gov/eventsactions/docket/5058-NGrid-DR-PUC2%20\(12-23-2020\).pdf](http://www.ripuc.ri.gov/eventsactions/docket/5058-NGrid-DR-PUC2%20(12-23-2020).pdf)

determines that EDI transactions are to be provided to municipal aggregators, National Grid respectfully requests that the PUC establish a cost recovery mechanism so that municipal aggregators are responsible for the costs incurred by the Company to program its systems to allow for duplicate EDI transactions. Please see the Company's response to PUC 2-2 for estimated costs.

2. National Grid does not agree with Colonial's request for the Company to provide mailing lists of all plan community customers on a periodic basis.

Colonial is requesting that the Company provide municipal aggregators with mailing lists of all plan community customers on a periodic basis to facilitate plan customer education and consumer protection efforts. This process is currently not done in Massachusetts and, in fact, was ordered not to be done by the Massachusetts Department of Public Utilities ("MA DPU").⁴ The Company's role in municipal aggregations is to facilitate the implementation of an aggregation, which includes providing a list of eligible customers to the aggregator/nonregulated power producer, so that the opt-out process and the enrollment process can be accomplished. The Company recommends that the responsibility to provide a list of all customers in a municipality to aggregators be the responsibility and option of the specific municipality. Each municipality has resident and business information, including name and address, readily available and could provide such information to aggregators upon request.

⁴ See Report and Order in D.P.U. 19-51 and D.P.U. 19-52 (<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/12800815>) 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. "Therefore, the Towns will not receive a list of customers on competitive supply from National Grid and competitive supply customers will not: (1) be included in the eligible customer lists provided to the Program supplier by the distribution company; and (2) receive opt-out notices from each Town." (See Page 17 of the Report and Order)

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.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

April 20, 2021

Date

Docket No. 5058 – National Grid’s Terms & Conditions for Municipal Aggregators
Docket No. 5059 – National Grid’s Changes to Existing Terms & Conditions for NPPs
Service Lists updated 4/1/2021

Name/Address	E-mail Distribution	Phone
National Grid	Andrew.marcaccio@nationalgrid.com ;	401-784-7263
	Jennifer.hutchinson@nationalgrid.com ;	781-907-2121
Andrew Marcaccio, Esq.	Juliana.Griffiths@nationalgrid.com ;	
National Grid.	Joanne.scanlon@nationalgrid.com ;	
280 Melrose St.	Josh.Pasquariello@nationalgrid.com ;	
Providence, RI 02907		
Good Energy	jamie.rhodes@goodenergy.com ;	401-225-3441
	philip.carr@goodenergy.com ;	
James G. Rhodes, Esq.	stefano@goodenergy.com ;	
25 Governor St.	patrick@goodenergy.com ;	
Providence, RI 02906	tdeller@centralfallsri.us ;	
	mjerzyk@centralfallsri.us ;	
	phervey@barrington.ri.gov ;	
	mikeursillo@utrlaw.com ;	
Division of Public Utilities and Carriers	Jon.hagopian@dpuc.ri.gov ;	401-784-4775
	Leo.wold@dpuc.ri.gov ;	401-780-2177
Leo Wold, Esq.	John.bell@dpuc.ri.gov ;	
Jon Hagopian, Esq.	Margaret.L.Hogan@dpuc.ri.gov ;	
	Joel.Munoz@dpuc.ri.gov ;	
	dmacrae@riag.ri.gov ;	
	MFolcarelli@riag.ri.gov ;	
Colonial Power Group	smacgillivray@pierceatwood.com ;	
	javery@PierceAtwood.com ;	
Stephen McGillivray, Esq.	sormsbee@colonialpowergroup.com ;	
Pierce Atwood LLP	Mark@colonialpowergroup.com ;	
	denise@colonialpowergroup.com ;	
File an original (with electronic copies) to:	Luly.massaro@puc.ri.gov ;	401-780-2017
	Alan.nault@puc.ri.gov ;	

Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Cynthia.WilsonFrias@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	John.harrington@puc.ri.gov ;	
Office of Energy Resources Nicholas Ucci Christopher Kearns	Nicholas.ucci@energy.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	Becca.Trietch@energy.ri.gov ;	
	Nathan.Cleveland@energy.ri.gov ;	
	Carrie.Gill@energy.ri.gov ;	
	Albert.vitali@doa.ri.gov ;	
PPL Electric Utilities Ronald Reybitz Stephen Breininger	rjreybitz@pplweb.com ;	
	skbreininger@pplweb.com ;	