

Rhodes Consulting, James G. Rhodes Esq.  
205 Governor St.  
Providence, RI 02906

January 15, 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 5073 – Petition of Retail Energy Supply Association for Implementation of  
Purchase of Receivables Program**

Dear Ms. Massaro:

Enclosed please find an electronic version of Direct Testimony of Philip Carr on behalf of Good Energy in above-referenced docket.

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 5073 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 15, 2021

**Docket No. 5073 – Retail Energy Supply Associations Petition for Implementation of Purchase of Receivables Program  
Service List updated 1/5//2021**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
<b>NRG Energy, Inc.</b> Ryan M. Murphy, Esq. Eckert Seamans Cherin & Mellott, LLC Two International Place, 16 <sup>th</sup> Floor Boston, MA 02110	<a href="mailto:rmmurphy@eckertseamans.com">rmmurphy@eckertseamans.com;</a>	617-342-6884
	<a href="mailto:CWaksler@eckertseamans.com">CWaksler@eckertseamans.com;</a>	
	<a href="mailto:Kmoury@eckertseamans.com">Kmoury@eckertseamans.com;</a>	
	<a href="mailto:DODell@eckertseamans.com">DODell@eckertseamans.com;</a>	
<b>National Grid</b> Andrew Marcaccio, Esq. National Grid. 280 Melrose St. Providence, RI 02907	<a href="mailto:Andrew.Marcaccio@nationalgrid.com">Andrew.Marcaccio@nationalgrid.com;</a>	781-907-2121
	<a href="mailto:CELIA.OBRIEN@nationalgrid.com">CELIA.OBRIEN@nationalgrid.com;</a>	
	<a href="mailto:Jennifer.hutchinson@nationalgrid.com">Jennifer.hutchinson@nationalgrid.com;</a>	
	<a href="mailto:Juliana.Griffiths@nationalgrid.com">Juliana.Griffiths@nationalgrid.com;</a>	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com;</a>	
<b>Division of Public Utilities</b> Leo Wold, Esq. John Spirito, Esq. Division of Public Utilities and Carriers	<a href="mailto:Leo.wold@dpuc.ri.gov">Leo.wold@dpuc.ri.gov;</a>	
	<a href="mailto:John.spirito@dpuc.ri.gov">John.spirito@dpuc.ri.gov;</a>	
	<a href="mailto:Margaret.L.Hogan@dpuc.ri.gov">Margaret.L.Hogan@dpuc.ri.gov;</a>	
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov;</a>	
	<a href="mailto:Joel.Munoz@dpuc.ri.gov">Joel.Munoz@dpuc.ri.gov;</a>	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov;</a>	
	<a href="mailto:Mfolcarelli@riag.ri.gov">Mfolcarelli@riag.ri.gov;</a>	
Kathy Kelly Carrie Gilbert Daymark Energy Advisors	<a href="mailto:kkelly@daymarkea.com">kkelly@daymarkea.com;</a>	
	<a href="mailto:cgilbert@daymarkea.com">cgilbert@daymarkea.com;</a>	

<p><b>Direct Energy Business LLC</b> Joseph A. Farside, Jr. Locke Lord LLP 2800 Financial Plaza Providence, RI 02903</p>	<p><a href="mailto:Joseph.Farside@lockelord.com">Joseph.Farside@lockelord.com</a>;</p>	<p>401-274-9200</p>
<p><b>Good Energy, Inc.</b> James G. Rhodes, Esq. 205 Governor St. Providence, RI 02906</p>	<p><a href="mailto:jamie.rhodes@goodenergy.com">jamie.rhodes@goodenergy.com</a>; <a href="mailto:philip.carr@goodenergy.com">philip.carr@goodenergy.com</a>; <a href="mailto:stefano@goodenergy.com">stefano@goodenergy.com</a>; <a href="mailto:patrick@goodenergy.com">patrick@goodenergy.com</a>;</p>	<p>401-225-3441</p>
<p><b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk Cynthia Wilson-Frias, Counsel <b>Public Utilities Commission</b> 89 Jefferson Blvd. Warwick, RI 02888</p>	<p><a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a>; <a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a>; <a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a>; <a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a>; <a href="mailto:John.harrington@puc.ri.gov">John.harrington@puc.ri.gov</a>; <a href="mailto:Rudolph.S.Falcone@puc.ri.gov">Rudolph.S.Falcone@puc.ri.gov</a>;</p>	<p>401-780-2017</p>
<p><b>Office of Energy Resources</b> Albert Vitali, Esq. Nicholas Ucci Christopher Kearns</p>	<p><a href="mailto:Nicholas.ucci@energy.ri.gov">Nicholas.ucci@energy.ri.gov</a>; <a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a>; <a href="mailto:Becca.Trietch@energy.ri.gov">Becca.Trietch@energy.ri.gov</a>; <a href="mailto:Nathan.Cleveland@energy.ri.gov">Nathan.Cleveland@energy.ri.gov</a>; <a href="mailto:Carrie.Gill@energy.ri.gov">Carrie.Gill@energy.ri.gov</a>; <a href="mailto:Albert.vitali@doa.ri.gov">Albert.vitali@doa.ri.gov</a></p>	

STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION

DIRECT TESTIMONY OF

**PHILIP CARR**

ON BEHALF OF GOOD ENERGY L.P.

Docket No. 5073

January 15, 2021

1 **I. Introduction**

2 **Q. Please state your name and business address.**

3 A. My name is Philip Carr, and my business address is 17 High St. Norwalk, CT 06851.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am currently employed by Good Energy, L.P., in the role of Director, Energy Sales.

6 **Q. Please describe your present responsibility.**

7 A. I serve as the New England Director for Good Energy, L.P., a national energy  
8 consulting firm which provides advice on energy procurement throughout U.S.  
9 deregulated markets. In this role, I oversee all of our Community Electricity  
10 Aggregation operations, including over 40 active aggregation programs in  
11 Massachusetts and our developing programs in Rhode Island.

12 **Q. Have you previously testified before the Rhode Island Public Utilities Commission**  
13 **(“Commission”)?**

14 A. Yes, I have testified on behalf of Good Energy as part of the petitions from the City of  
15 Central Falls (Docket #5042), Town of Barrington (5047), Town of South Kingstown  
16 (5062), and the City of Providence (5061) requesting the Commission’s approval of  
17 their Community Choice Electricity Aggregation Plans.

18 **Q. What is the purpose of your testimony?**

19 A. The purpose of this testimony is to support the observation of the Retail Electric  
20 Suppliers Association’s (RESA) expert that “[i]mplementation of a POR program  
21 would facilitate supplier participation in municipal aggregation and increase the  
22 likelihood of its success.”

23  
24 **II. Impact of Purchase of Receivables on Municipal Aggregation Programs**

25 **Q. What is Good Energy’s interest in the outcome of this docket and the potential**  
26 **establishment of a Purchase of Receivables (“POR”) program?**

27 A. Good Energy is currently working with six (6) Rhode Island communities to develop  
28 and implement municipal aggregation programs. One of the primary differences  
29 between the competitive electric markets in Rhode Island and Massachusetts is the  
30 existence of a POR program. Our belief is that the creation of a POR program in Rhode

1 Island would encourage the development of a more robust market for competitive  
2 electric supply. That would in turn allow Rhode Island communities to develop and  
3 administer more effective aggregation programs with increased competition and greater  
4 participation of suppliers when communities take their electricity load out to bid.

5 **Q. What is the history of aggregation programs in Massachusetts prior to the**  
6 **establishment of a POR program?**

7 A. Based on data compiled by the Massachusetts Department of Public Utilities (MA  
8 DPU) from 1999 through 2013 there were only 13 municipal aggregation plans filed  
9 with the Department. POR was introduced in Massachusetts in the first quarter of 2014.

10 **Q. What happened following the establishment of POR in Massachusetts?**

11 A. Beginning at the end of 2013 and the start of 2014, and continuing through the end of  
12 2019, the Department received 203 plans from communities in the Commonwealth to  
13 establish municipal aggregation programs. We expect to be able to update this data  
14 when the MA DPU compiles and releases its 2020 Annual Report. Since the  
15 introduction of POR, most of the larger municipalities in Massachusetts have  
16 established or are developing electric aggregation programs, including Boston,  
17 Worcester, Cambridge, New Bedford, Quincy and Fall River. My observation is that  
18 the establishment of POR increased the participation of suppliers in the Massachusetts  
19 electric market that serve municipal aggregations.

20 **Q. How will POR impact the operations of an aggregation program?**

21 A. POR will simplify the billing process for customers that are participating in the  
22 aggregation program and allow for greater participation regardless of a customer's  
23 ability to pay. As noted by the Division of Public Utilities and Carriers in both the  
24 Central Falls and South Kingstown aggregation plan dockets, the implementation of a  
25 POR program in Massachusetts addresses the fact that, currently, customers who  
26 choose competitive supply do not have access to a number of utility run billing options  
27 for the supply portion of their bill.

28

1       **Q. Can you further describe the billing options that POR would make available to**  
2       **aggregation program participants?**

3       A. As noted by the Division, the existing Arrearage Management Plan and Budget Billing  
4       programs are not currently available to customers that utilize a non-regulated power  
5       producer for electricity supply. A POR program would allow customers who participate  
6       in an aggregation program to avail themselves of these budgeting options. This is a  
7       direct benefit to customers, especially the Arrearage Management Plan that could  
8       provide low-income ratepayers a direct financial benefit in the form of debt  
9       forgiveness. While the budget billing program does not reduce the amount owed by a  
10      customer, it does provide consistent and predictable monthly payments.

11      **III. Conclusion**

12      **Q. Does that conclude your testimony?**

13      A. Yes, and I reserve the right to further supplement this testimony as may be necessary.