

Joule Assets, Inc.

Community Choice Aggregation Implementation Plan

Appendix B: Finger Lakes Community Choice

March 2020

Revised August 2020

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

This Appendix to the Master Community Choice Aggregation (“CCA”) Implementation Plan (filed by Joule Assets, Inc. on 11/9/2017 in Case 14-M-0224) is hereby submitted on behalf of the Village of Lima, Village of Brockport, Town of Geneva and any additional area municipalities that adopt this Implementation Plan pursuant to the requirements set forth in the PSC CCA Order (collectively, “Program Municipalities”). Program Municipalities have selected Joule Assets, Inc. (“Joule”) as the CCA Administrator, and comprise its Rochester/Finger Lakes regional aggregation.

The Village of Lima and Village of Brockport have decided to move forward with an opt-out Community Distributed Generation (CDG) program, as proposed in the Joule Assets CCA Master Implementation Plan, approved by the Public Service Commission in “Order Approving Joule Assets’ Community Choice Aggregation Plan with Modifications”, issued March 16, 2018 in Case 14-M-0224. The details of the opt-out CDG program are further described in the Opt-Out CDG Implementation Plan in Subsection B.1 of this Appendix.

Rochester People’s Climate Coalition (“RPCC”) is serving as Local Organizer for the Rochester/Finger Lakes Program, and will share in the administrative fees as a local contractor of Joule. RPCC, a non-profit organization committed to achieving sustainability and climate change action goals in the greater Rochester area, is responsible for Program inception, and has played an indispensable role in the organization of Program Municipalities and consensus-building around Program priorities and goals.

Since initial filing of this Appendix, principals of RPCC have formed a new entity, Roctricity, LLC. to serve in the Local Organizer role for this and other area CCA programs. Roctricity is a Rochester-based business founded by sustainability professionals with the mission of advancing clean energy initiatives in the greater Rochester area. Roctricity seeks to provide the focus, agility, and transparency to the local CCA effort.

Joule has been conducting consistent outreach to elected officials, community groups, and in public Q&A sessions in Program Municipalities, in partnership with RPCC starting in June 2016. Please see Public Outreach and Local Press Coverage Summary below.

Roctricity will continue to spearhead community outreach and education. Together, Joule and Roctricity will support Program Municipalities as they develop agreements and Solicitations that reflect community priorities and, above all else, protect consumers. RPCC is responsible for setting up and managing the Local Operation for ongoing local Program development, maintenance of the Program Portal, customer support, and stakeholder engagement.

Please find below:

- Public Outreach and Local Press Coverage Summary
- Local Government/Community Meeting and Event Timeline
- Certifications of Local Enabling Legislation
- Opt-Out CDG Implementation Plan (added August 2020)

Public Outreach and Local Press Coverage Summary Prepared by Joule Assets and Rochester People’s Climate Coalition

Background: The Rochester People’s Climate Coalition (RPCC) is an umbrella organization that includes business, civic, faith and environmental groups. Launched in 2014 to mobilize our community to attend the People’s Climate March in NYC, our organization has grown to include over 120 member groups and has refined our vision for climate action. Our work to eliminate greenhouse gas emissions from the greater Rochester region is

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focused on four action pathways: Renewable Energy Transition, Land Use, Building Efficiency, and Transportation.

The Renewable Energy Transition team began exploring state and local strategies for increasing renewable energy in electrical generation. These strategies, including Community Choice Aggregation, were introduced to our community during a panel presentation in December 2015. Workshop attendees saw community choice aggregation as a powerful tool and spent the following six months learning, researching, and building relationships in other communities (Sullivan, Westchester Counties) that were engaged in the same work. By the time the Public Service Commission issued its ruling on CCA in April of 2016, the Rochester People's Climate Coalition had developed a core team focused on educating the community about the potential of implementing a CCA program in our region.

2016 Outreach: In June 2016, the RPCC team invited Joule Assets to meet with community members in Rochester to discuss CCA and the Westchester Power experience. There were ten community members in attendance including a municipal employee of the City of Rochester and a town Supervisor. Over the summer, the RPCC community choice aggregation team contacted municipal leaders to inform them about the program. More than 45 communities were contacted including all of the towns, and villages in Monroe County, the City of Rochester and a few communities in neighboring counties. Each community received an introductory letter and offer for further discussion. More than a dozen communities responded with phone conversations and in person meetings to learn more about community choice aggregation.

The RPCC team hosted the first workshop on CCA for municipal leaders in Monroe County in September 2016. Two staff members from Joule Assets were invited to give an overview presentation on community choice aggregation and lead a discussion. In addition to the RPCC team, the meeting was attended by a dozen people including three village mayors, village board members, town staff and staff from the City of Rochester.

A follow up workshop was hosted by RPCC in November of 2016. David Zorn of the Genesee/Finger Lakes Regional Planning Council presented on the Clean Energy Communities program, followed by a presentation by Joule/RPCC on Community Choice Aggregation, including the process for implementation and local progress.

2017 Outreach: The RPCC community choice aggregation team gave 32 presentations to municipal leaders during the year, including: 13 public board presentations, 6 public hearings, 3 committee meetings, 7 small group meetings with Mayors/Supervisors/staff, the Monroe County Mayoral association, the Monroe County Town Supervisor's meeting, and the Genesee/Finger Lakes Regional Planning Council small government workshop. In addition, approximately 50 municipalities are receiving monthly e-mail updates on the educational opportunities to learn about CCA and the progress being made locally towards establishing a program. A third CCA workshop for municipal leaders and staff was held in the Penfield Town Hall in April. David Zorn presented on Clean Energy Communities followed by a presentation on CCA by Joule/RPCC. The workshop was attended by representatives from 6 (?) communities.

General public outreach was also conducted in 2017 through a variety of mechanisms. On fourteen occasions, the RPCC team attended events and farmer's markets to staff an educational table. The team explained CCA to approximately 550 people during these events. Presentations were also given to 9 neighborhood associations for 135 attendees. Four business and civic groups requested education on CCA, attended by 50 people. Ten faith groups (8 churches, 1 synagogue) hosted the CCA presentation for 66 people. There were 3 public forums where CCA education was shared with 126 people. The RPCC also co-hosted a regional Climate Action Summit at the Harley school, Brighton NY on October 28th. Over 250 people from across western NY attended the summit and approximately 35 people attended the CCA specific workshop.

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Community Choice Aggregation outreach has also been accomplished through the media. RPCC is a regular guest on the local NPR affiliate, WXXI, to discuss issues related to climate change. During 2017, there were 3 opportunities for RPCC to highlight community choice aggregation. In print, there were 2 articles including the South Wedge Quarterly, and City News. There were also 2 on-line articles from WXXI, an NPR affiliate and Open Mic Rochester. One guest-essay was submitted in favor of CCA to the Democrat and Chronicle.

<https://www.rochestercitynewspaper.com/rochester/local-summit-aims-for-action-on-climate/Content?oid=4501129>

<https://www.rochestercitynewspaper.com/rochester/city-moving-on-energy-program/Content?oid=4002824>

<http://wxxinews.org/post/city-rochester-furthering-commitment-clean-energy>

<https://www.southwedge.com/issues/swq-spring-2017/>

<http://www.openmicroc.com/community-choice-aggregation-path-to-a-green-rochester/>

<http://www.democratandchronicle.com/story/opinion/guest-column/2017/02/03/rochester-choose-clean-energy/97468818/>

The Rochester People's Climate Coalition also hosts a website and CCA information can be found at this link <http://roccpcc.com/our-work/renewable-energy-transition/> It includes a 5-minute long video that was produced about our efforts.

Local Government/Community Meeting and Event Timeline Prepared by Joule Assets and Rochester People's Climate Coalition

Date	Audience	Location	Attendees	Notes
6/24/16	Officials from Brighton and Rochester	Brighton	10	Joule, RPCC present
11/16/16	Officials from Aurora, Brockport, Mendon, Geneseo, Sodus Point, Richmond, Fayette, Brighton, Canandaigua, Bristol, Mt. Morris, York, Wendal, Caledonia, Spencerport, Sodus, Genesee Co., Wayne Co., Livingston Co.	Fall Regional Local Government Workshop, Batavia NY	29	Joule co-presents with RPCC and Genesee Finger Lakes Regional Planning Commission ("GFLRPC")
11/17/16	Officials from Brockport, Penfield, Rochester, Gates, Irondequoit, Palmyra, Farmington, Wayne Co. Econ. Dev.	Penfield Town Hall	23	GLFRPC co-hosts with Joule, RPCC
1/3/17	General Public	Brighton Library	80	RPCC
1/17/17	Pittsford Village Board	Village Hall	10	RPCC
2/22/17	Farmington Town Board	Town Hall	20	RPCC
3/6/17	Brockport Village Board	Village Hall	10	RPCC
3/22/17	Rochester Neighborhood Assn.	218 Clifford	20	RPCC
4/3/17	NY: State of Climate Action	St. Thomas	62	RPCC
4/3/17	WXXI Audience	RADIO	??	RPCC
4/5/17	Municipal Officials/Workers	Penfield Town Hall	6	Joule co-presents with RPCC and GFLRPC
4/12/17	South Wedge Bus.Assn	357 Gregory	13	RPCC

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4/13/17	Mothers Out Front	Irondequoit Library	4	RPCC
4/15/17	Benefit Concert	Anthology - 336 East Ave	10	RPCC
4/17/17	Sodus Climate Smart Communities	Sodus Municipal Building	6	RPCC
4/17/17	CCL Monthly mtg	UU church	30	RPCC
4/18/17	NE Service Center – Rochester	500 Norton St	0	RPCC
4/18/17	Park Ave Revitalization cmtee	Kirkhaven Home	14	RPCC
4/20/17	Mayoral Association	500 South Union, Spprt	24	RPCC
4/20/17	Sierra Club Forum Tabling	New Bethel CME Church	20	RPCC
4/22/17	SunWorthy Tabling	Abundance 571 South Ave	58	RPCC
4/22/17	Science March Tabling	Hyatt	32	RPCC
4/22/17	Edgerton Earth Day Tabling	Jones Square Park	10	RPCC
4/23/17	Spiritus Christi-Tabling	121 N Fitzhugh	9	RPCC
4/25/17	Rochester City Council	City Hall	6	RPCC
4/29/17	Climate Rally Tabling	Washington Square Park	250 postcards	RPCC
4/30/17	Downtown United Presbyterian	121 N. Fitzhugh	28	RPCC
4/30/17	Gates Presbyterian	1049 Wegman Rd, 14624	1	RPCC
5/2/17	Upper Monroe Nbhd. Assn	New Life Pres. Monroe Ave	12	RPCC
5/4/17	Beechwood Nbr Assn	Ryan Center	28	RPCC
5/7/17	Third Presbyterian	East Ave	17	RPCC
5/7/17	Christ Church	East Ave	12	RPCC
5/7/17	UU church	220 Winton Rd, Rm 115	3	RPCC
5/9/17	Lima Board	Lima	?	Discussion
5/9/17	Geneva Town Board	Cty rd 6	5	RPCC
5/11/17	Central Church of Christ	191 S Plymouth	1	RPCC
5/16/17	Mike Guyon	Brighton Town Hall	1	RPCC
5/18/17	SunCommon	318 Timothy lane 14519	1	RPCC
5/19/17	Town Supervisors Meeting	Lexington Hotel	13	RPCC
5/23/17	NE Service Center – Rochester	500 Norton Ave	15	RPCC
5/24/17	Rochester City Council	City Hall	6	RPCC
5/25/17	Gantt Recreation Center	North Ave	4	RPCC
5/30/17	City of Rochester	City Hall	3	Joule, RPCC
6/1/17	Bill Moehle	Brighton Town Hall	2	RPCC
6/2/17	Federal Bldg Rally	State St.	52	RPCC
6/5/17	Charlotte Community Association	Roger Robach Center	35	RPCC
6/6/17	Mayor Warren	City Hall	3	RPCC
6/8/17	Irondqt. Farmer Mkt	Irond Town Hall	20	RPCC

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6/13/17	Lima Board	Lima	12?	Joule, RPCC
6/13/17	Scottsville Board	Scottsville	5+5 board	RPCC
6/18/17	Brighton Eco-Fair Tabling	BHS front lawn	30	RPCC
6/19/17	Honeoye Falls Village Board	HF	10	RPCC
7/10/17	Bri. Sust. Overs. Cmtee	Brighton Town Hall	7	RPCC
7/11/17	Scottsville Board	22 Main St Town Hall	40	RPCC
7/11/17	Lima Board	Village Hall	20	Local law approved; Joule, RPCC
8/1/17	Brighton Public Works	Brighton Town Hall	6	RPCC
8/5/17	Lima Blues Festival	Lima village	36	RPCC
8/6/17	Lima Blues Festival	Lima village	2	RPCC
8/8/17	Pittsford Town Supervisor	Pittsford	2	Joule, RPCC
8/8/17	Geneva Town Public Hearing	Geneva Town Hall	10	Local law approved; Joule, RPCC
8/8/17	Scottsville Public Hearing	22 Main St. town Hall	10	Local law approved; Joule, RPCC
8/8/17	City of Rochester	City Hall	8	Joule, RPCC
8/23/17	Brighton Public Hearing	B town hall	10 and board	public hearing part I; RPCC
9/7/17	Beechwood Nbr Assn		15	public presentation; RPCC
9/12/17	Geneva Town Board	Geneva Town Hall	2 - us	resolution to select Administrator; RPCC
9/13/17	Brighton Public Hearing	Town Hall	12 and board	public hearing part II; RPCC
9/14/17	Nat Council Jewish Women	Temple Sinai	4	Tabling; RPCC
9/16/17	RochesterVeg Fest	MLK park, Roch	51 postcards	RPCC
9/18/17	Brockport Village Board	49 State St	15	Public Hearing; RPCC
9/26/17	Pittsford village board	Pittsford	5	info meeting; Joule, RPCC
10/1/17	St Monica's church	831 Genesee St.	10	info meeting; RPCC
10/2/17	Brockport Village Board	49 State ST	20	Local law approved; RPCC
10/10/17	Scottsville Vlg. Board	Town Hall	board	gen'l info Q&A; RPCC
10/15/17	Brighton Farmers Market	Bri High parking lot	20	Tabling; RPCC
10/29/17	Brighton Farmers Market	Bri High parking lot	20	Tabling; RPCC
10/30/17	Climate Summit	Harley	35	CCA presentation; RPCC
11/9/17	Canandaigua	Main St	2	Muni officials; RPCC
11/12/17	Brighton Farmers Market	Bri High parking lot	20	Tabling; RPCC
11/16/17	St.Annes	1600 Mt. Hope	20	Catholic diocess environmental groups; RPCC
11/17/17	GFLRPC Gov't Workshop	Batavia	5	government staff; RPCC
12/2/17	Our Lady of Lourdes	Brighton	6	adult congregants/parents of young kids; RPCC

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12/11/17	Canandaigua	Library	12	Mayor, 3 council, 1 town official, UUCC; RPCC
1/2/18	Village of Victor	60 E Main St	9	Mayor, village board, lawyer; RPCC
1/9/18	Canandaigua Env. Committee	Wood Library - Hamlin room	25	Mayor, city council, community; RPCC
1/11/18	Irondequoit	Library	15	Mothers Out Front, Town Bd members; RPCC
1/15/18	Our Lady of Lourdes	Brighton	10	RPCC
1/16/18	Community Services Committee	Brighton	18	RPCC
1/23/18	St. Anne's	1600 Mt. Hope	6	Creation Care Committee, municipal leaders; RPCC
2/7/18	Officials from Honeoye Falls, Pittsford, Geneseo, Irondequoit, Rochester, Brighton	Penfield Town Hall	15	Joule, RPCC, GFLRPC
2/7/18	City of Geneva Council	City Hall	30	Joule, RPCC
5/18/18	Small Gov't Workshop	Burgendy Basin		

This outreach summary has been prepared chronologically, and not by municipality since there have been so many engaged municipalities, often organized into intermunicipal meetings and outreach events to maximize impact. Below is a summary of the meeting and outreach event dates in which each of the Program Municipalities has formally participated:

- Village of Lima: 5/9/17, 6/13/17, 7/11/17, 8/5/17, 8/6/17
- Village of Brockport: 11/16/16, 11/17/16, 3/6/17, 9/18/17, 10/2/17
- Town of Geneva: 5/9/17, 8/8/17, 9/12/17

B.1. Opt-Out CDG Implementation Plan for Village of Lima and Village of Brockport

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1 Purpose and Authority

Joule Assets Inc. (“Joule”) hereby submits this Opt-Out Community Distributed Generation (“CDG”) Implementation Plan (the “Plan”) for the Finger Lakes Community Choice Program, as a supplement to Appendix B of the Joule Assets Community Choice Aggregation (“CCA”) Master Implementation Plan (“Master IP”), for Department of Public Service approval. The Plan has been designed to satisfy requirements set forth in the New York Public Service Commission (the “Commission”) *Order Approving Joule Assets’ Community Choice Aggregation Program with Modifications* (“Joule Order”), issued March 16, 2018, the Master IP, as well as Commission Orders in Case 15-E-0082, *Proceeding on Motion of the Commission as to the Policies, Requirements and Conditions For Implementing a Community Net Metering Program*.

This Plan describes the structural and operational details pertaining to the implementation of an opt-out CDG program (“Opt-Out CDG Program”) to the Finger Lakes Community Choice Program, for the Village of Lima and Village of Brockport (each a “Participating Municipality”). The Joule Order authorizes Participating Municipalities to implement a CCA program¹, and to integrate an Opt-Out CDG Program, conditional on Department of Public Service Staff (“Staff”) approval of the Plan. Details of local enabling legislation and outreach activities in the Participating Municipalities are filed as Appendix B to the Joule Master IP and approved in the Joule Order. The Participating Municipalities are incorporated villages in Niagara Mohawk territory (served by distribution utility National Grid).

Program Goals

Consistent with Commission requirements, guidelines, Appendix B, and the approved Master IP:

- 1. The Opt-Out CDG Program will not cost extra for any project subscriber in any month;
- 2. The Opt-Out CDG Program will provide equitable consumer access to community-scale renewables;
- 3. No subscriber will have their service disconnected for any reason related to the Program;
- 4. Community members will be well educated on Program features and consumer options;

¹ Please see Appendix B of the Master IP (originally filed March 6, 2018) for certification of local legislation and proof of outreach activities required for CCA implementation.

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5. The Opt-Out CDG Program will aim to accelerate clean energy project development, drive investment into clean energy markets and improvements in system resilience, and mitigate ecological degradation and toxic effluence from fossil fuel power plants; and
6. The Opt-Out CDG Program will advance several Reforming the Energy Vision and Climate Leadership and Community Protection Act goals.

In order to achieve these goals, Joule and Participating Municipalities intend to contract directly with CDG Sponsors to offer subscriptions to CDG Projects to eligible Finger Lakes Community Choice customers within Participating Municipalities (“Program Customers”) on an opt-out basis. Participating Municipalities have not yet successfully awarded a CCA electricity supply contract and intend to integrate opt-out CDG as an additional program offering, independent of commodity supply.

Regulatory Authority and Requirements

The Joule Order requires Joule to file an updated Opt-Out CDG Implementation Plan, to be approved by Staff, before enrolling any customer in a CDG program on an opt-out basis. The Joule Order also requires the Plan to provide, amongst other requirements, an account of the “magnitude of participating CDG projects, the target subscription class, the scope and structure of the guaranteed savings, the billing arrangement, and any additional outreach and education [Joule] intends to provide.”² In addition, the Commission ordered that “customers must be permitted to opt out or cancel their CDG membership at any time without penalty”, and directed Joule to provide quarterly reporting verifying consistent, measured savings for subscribers.³

Expanding upon the existing ability of additional product offerings for CCA members, the Joule Order represents the first Commission authorization for New York municipalities to integrate a CDG component on an opt-out basis, combining the benefits of CCA energy supply and membership in CDG projects.

New York’s CCA policy⁴ authorizes municipalities to collectively represent residents and small businesses in retail energy markets (electricity and natural gas supply), negotiate for desired terms, and enter into contracts with suppliers. Consumers are given the option to take advantage of the offer negotiated by the municipality or to opt out and remain with utility supply. Certain market rules are suspended permitting municipalities to switch eligible utility customers to a designated ESCO “without affirmative consent”⁵ from individual customers.

In the Joule Order, the Commission extended analogous authority to Participating Municipalities for CDG enrollment⁶—i.e., municipal consent stands in the place of explicit customer consent.⁷ That is, CDG subscriptions may be offered on an opt-out basis, as with CCA energy supply, subject to Staff approval of the Plan.

2 Opt-Out CDG Program Structure

² Joule Order, p.16.

³ Ibid.

⁴ Commission Order Authorizing Framework for Community Choice Aggregation Opt-Out Program (“CCA Framework Order”), Case 14-M-0224 issued April 21, 2016.

⁵ See CCA Framework Order, p.50.

⁶ As described in the Uniform Business Practices for Distributed Energy Resource Suppliers (“UBP DERS”) (Case 15-M-0180), Section 2A (p.6).

⁷ Joule Order, p.22.

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Joule has developed its proposed Opt-Out CDG Program structure in collaboration with, and reflective of feedback from, community leaders throughout New York State, NYSEDA, Staff, CDG Sponsors, and other key stakeholder groups. Throughout this process, Joule has designed the Opt-Out CDG Program to support market development and create durable value within Participating Municipalities. Opt-Out CDG Program administration, data handling/security, and procurement procedures proposed herein are compliant with existing regulations governing conventional CCA implementation (i.e. electric or gas commodity procurement) and require no additional authorizations or legal/regulatory changes.

The Opt-Out CDG Program aims to serve three core interests of municipal governments and communities:

1. Municipalities play a critical role in the CDG market in the evaluation, permitting, zoning, environmental review, and taxing of privately developed projects, as well as the development, financing, and/or ownership of projects on municipal sites. Community leaders will undoubtedly benefit from expert support, but are constrained by limited resources to engage third party consultants.
2. New York State communities have expressed a preference for local clean energy and have established sustainability goals through a diverse range of actions (e.g., participation in the Clean Energy Communities and/or Climate Smart Communities programs⁸, 100% renewable energy pledges⁹). Communities are searching for additional tools to achieve these goals and to contribute to the realization of New York State's ambitious Climate Leadership and Community Protection Act and Clean Energy Standard.
3. Local economic development drives community support of local clean energy projects and other distributed energy resources. Successful models will provide for community ownership and control, as well as maximize project and consumer value based on available market opportunities (e.g. LSRV, storage incentives, NYISO markets) and system resilience.

New York State CDG Regulation and Market Design

CDG generation consists of decentralized renewables and efficient fossil fuel technologies interconnected to the utility distribution network. Project capacity must be less than 5 megawatts. CDG projects are typically several hundred times larger than the average residential rooftop solar array yet several hundred times smaller than most centralized natural gas or nuclear power plants. They do not inject power into the transmission grid, nor do they sell power on the wholesale markets or contract with a single large (on or offsite) consumer.

CDG projects must be subscribed to by at least ten utility customers, often hundreds, and at least 60% of the project must be allocated to residential and/or small commercial customers. CDG projects typically produce enough clean electricity to power 100-1000 homes and small businesses and subscribers must reside in the same utility service territory as the project – hence, the common monikers “community renewables” or “shared solar.” New York State's interconnection queue currently lists 3,812 MW of registered CDG capacity.

A subscription is an allocated portion of the project (energy production), applied to a subscriber's utility bill in the form of monetary credits (“CDG Credits”) equal to the value of the power offset by subscribing. CDG Credits are essentially rewards for project subscribers, in exchange for their financial support of the project, and reflect the system value of the project inclusive of its environmental benefit.

⁸ <https://www.nyserda.ny.gov/All-Programs/Programs/Clean-Energy-Communities> .

⁹ For instance, see Sierra Club's *Ready for 100* campaign: <https://www.sierraclub.org/ready-for-100> .

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Guaranteed Savings

CDG Sponsors will offer CDG Credits to subscribers at a maximum of 95% of their monetary value, or a minimum 5% discount on the portion of the bill covered by CDG Credits.¹⁰ National Grid will apply only the net credit value (i.e., the discount amount) to subscribers' bills. This net discount will reduce subscribers' billed amount in each month that the CDG project is operational.

Consumer Protections

Joule will implement the following features in its Opt-Out CDG Program to protect consumers from undue risk or obligation.

1. *Customers may opt out or leave the Program for any reason, at any time, with no penalty.* They may do so by calling the Program customer service hotline or through the online Customer Portal (see [Section 4](#) for more details on portal). Consumers may opt out before enrollment in which case their account information will not be shared. Once enrolled, cancellation is simple, executed within three billing cycles of cancellation request, with no additional hoops to jump through or hard sell to reconsider. However, due to unpredictable availability, there are no guarantees of re-enrollment should consumers wish to resume their subscription.
2. *Minimal customer commitment.* In order to protect Program Customers from additional legal and financial exposure or obligations, there will be no formal CDG customer agreement executed by the customer. Rather, participation in the Opt-Out CDG Program will be subject to universally applied subscriber terms of service described in the Standard Disclosure Form provided to all eligible customers and permanently posted on the Program website. Terms of service will be consistent with the Uniform Business Practices for Distributed Energy Resource Suppliers. See **Attachment B.1.1: Sample Standard Disclosure Form**.
3. *No credit requirements.* All eligible Opt-Out CDG Program Customers are free to enroll regardless of credit profile. In the past, CDG subscribers typically have been subject to credit checks and enrollment requirements (e.g. >650 FICO score). This restricts consumers from accessing the benefits of CDG subscription.

Municipal Authorization

Each Participating Municipality has chosen to pass a resolution detailing its intent to integrate CDG subscriptions into the municipal CCA program on an opt-out basis, as well as its justification and expected program benefits. Please see **Attachment B.1.2: Municipal Resolutions**.

Integrated Procurement Model

Procurement for both electricity supply and CDG capacity will be undertaken in parallel. However, the timeline for successful execution of each component is somewhat uncertain. It may, for instance, take longer for CDG projects to reach commercial operation than expected. Conversely, market conditions may prevent electricity suppliers from offering compliant pricing in response to the initial solicitations, and Participating Municipalities may choose to delay contract execution until more favorable pricing is available. It is Joule's role as CCA Administrator to advise the Participating Municipalities on the prospective value and strategic timing of market opportunities, in the best interests of the communities and consumers.

For that reason, this Plan describes practices and procedures (including outreach activities) that are specific to the implementation of the Opt-Out CDG Program. The electricity supply component will be implemented in accordance with the approved Master IP and Appendix B.

¹⁰ See Commission Order Regarding Consolidated Billing for Community Distributed Generation, Case 19-M-0463 issued December 12, 2019 (the "Consolidated Billing Order").

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Throughout the multi-stage implementation, Program communications will describe the integrated nature of the Program, including the distinct yet additive benefits of both aggregated purchasing of 100% renewable electricity supply and subscription in local community renewables. Consumers will be educated about their options, including the ability to enroll in either, neither, or both components of the Program with no penalties or disadvantages for partial participation.

Consolidated Utility Billing

Historically, CDG customer payment has been executed through a supplemental bill issued by, and paid to, the CDG Sponsor. The CDG subscriber's utility bill reflects power consumed during that billing cycle, and includes a bill credit associated with their allocated CDG Credits. Subscribers then receive a second invoice from the CDG Sponsor for payment for the CDG Credits alone. Thus, there are two distinct customer payments: one for power supply and delivery to the utility (net of Credits applied), and one for CDG Credits to the CDG Sponsor. CDG Credits offset utility charges but are not a substitute for power supply, and CDG subscribers are still required to have an energy supplier (utility or ESCO).

On December 12, 2019, the Commission ordered New York State investor-owned utilities to implement a consolidated billing system for CDG subscribers¹¹, such that the two billing transactions are unified on the customer's utility bill, and net discounts are credited to the subscriber without the need for a supplemental invoice ("Net Crediting"). To maintain their CDG subscription, subscribers will simply pay their monthly electric bill. A unified bill format promises to streamline the customer experience, presenting a clear and transparent value proposition in a familiar format. In the case of CDG subscriptions offered within a CCA program, the CCA Administrator can support consolidated billing by providing customer service and support, review and verification of applied CDG Credits, and discrepancy resolution with the utility and/or CDG Sponsor.

The implementation of Net Crediting within the Opt-Out CDG Program will follow guidelines of an approved CDG Net Crediting Manual (draft delivered by National Grid on July 31, 2020) and abide by the terms of an approved Joint Utilities Net Crediting Agreement. To the extent that "fully executed contracts"¹² are required for each subscriber, it is expected that the authorization granted to the Participating Municipalities in the Joule Order in conjunction with Staff approval of this Plan will satisfy customer consent requirements established in the Net Crediting Agreement.

Opt-Out CDG Program Subscription Model

Program Customers within Participating Municipalities will collectively serve as the subscriber base for selected CDG projects within Niagara Mohawk service territory. Each subscriber will be individually allocated CDG Credits from those accumulated at the host meter(s). Pursuant to CDG regulation¹³, each individual subscriber will be allocated CDG Credits as a percentage of project production that equate to at least 1,000kWh annually, and no Program Customer may be a member of more than one CDG project. Allocation requests will be made up to 60 days before the Credits are applied to subscribers' bills. Periodic re-allocation may be necessary to manage subscriber churn. Should regulations change in the future, Participating Municipalities may amend policies consistent with prevailing paradigms.

¹¹ Consolidated Billing Order.

¹² Draft Community Distributed Generation Net Crediting Agreement proposed by the Joint Utilities in Case 19-M-0463, March 2, 2020, p. 2.

¹³ Commission Order Establishing A Community Distributed Generation Program And Making Other Findings (the "CDG Order"; issued July 17, 2015 in Case 15-E-0082).

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

Joule and Participating Municipalities will seek to secure sufficient CDG capacity to offer CDG subscriptions for all eligible consumers. It is proposed National Grid pre-screen consumers for CDG eligibility (e.g. they do not have a net metering account or active CDG subscription) prior to subscription (see Customer Eligibility below for more detail). However, this will require agreements with several CDG projects, and therefore capacity will likely stream in over time as each project reaches commercial operationalization. To manage this process, Joule will work with National Grid to add eligible Program Customers to a secure database in an “enrollment queue,” where they will remain until enrolled in accordance with the opt-out enrollment protocol described below. With sufficient capacity secured at Program launch to serve all, it is expected that some Program Customers may remain in the enrollment queue for up to 6 months.

Should aggregated demand of opt-out eligible customer classes within the Participating Municipalities exceed CDG capacity available at the time of Program launch, eligible consumers in Participating Municipalities may be offered an opportunity to secure capacity and enroll on an opt-in basis prior to opt-out enrollment. To opt-in, the subscriber will provide the following information through the Customer Portal:

- a. account holder name;
- b. service address;
- c. account identifier located on monthly bill (customer proxy ID or account number if proxy ID unavailable);
- d. authorization for access to account historical usage; and
- e. email address.

Allocations for opt-in subscribers will be determined for each subscriber based on historical consumption,

[REDACTED]

Remaining available capacity will be allocated evenly to opt-out Customers regardless of individual consumption. Allocations will be sized to promote maximum participation, while preserving significant and consistent savings for all subscribers ([REDACTED])

[REDACTED]

¹⁴ Commission Order Adopting a Prohibition on Service to Low-Income Customers by Energy Service Companies (issued December 16, 2016 in Case 12-M-0476 et al.) and Order Approving Community Choice Aggregation Program and Utility Data Security Agreement with Modifications (issued October 19, 2017 in Case 14-M-0224).

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

[REDACTED]

[REDACTED]

The Opt-Out CDG Notification Mailing (see Section 4 below for more details) will include project information (expected COD, location, capacity, ownership), opt out instructions, pricing/terms of guaranteed discount, related terms and conditions (e.g. free opt out at any time), and “Standard Disclosure Form” (as required by the Joule Order¹⁶). For project offers introduced after the initial Opt-Out CDG Notification Mailing has been sent, a distinct notification will be distributed to eligible consumers, containing this same information listed above. Joule will request refreshed lists of newly eligible utility customers (e.g. new residents, those that have recently left a CDG or net metering arrangement) from National Grid periodically (as often as quarterly) and will send Opt-Out CDG Notification Mailings to eligible consumers based on availability of CDG capacity. This process ensures maximum access and participation, and addresses customer migration (churn).

Customer Eligibility

In accordance with the CCA Framework Order, utility customers in Service Classes 1 and 2 are eligible for opt-out treatment within CCA programs. For electricity supply, the CCA Framework Order identifies additional eligibility rules. For instance, customers already on ESCO service or with a customer-initiated block on their utility account are not subject to opt-out enrollment.

The Opt-Out CDG Program requires analogous consideration from Staff. While ESCO customers are free to subscribe to a CDG project and should receive opt-out treatment, Joule requests Staff support to work with National Grid to create guidelines for opt-out enrollment. Specifically, we propose that all SC1 and SC2 customers be eligible for opt-out treatment with the exception of those:

- a. with an active onsite or remote net metering account.
- b. already subscribed to a CDG project.
- c. with a customer-initiated block.
- d. otherwise deemed ineligible for CDG enrollment in accordance with applicable regulations.

Community Energy Funding

Joule has offered CDG Credits on an opt-in basis to its client CCA communities since early 2019. Joule partners with municipal leadership to endorse and promote CDG participation, and shares revenues collected from CDG Sponsors as compensation for the community’s role in subscribing projects. A portion of this revenue accrues to a “sustainability fund,” to be spent at the discretion of the Participating

¹⁵ Find more information at: <https://www.nyserda.ny.gov/All-Programs/Programs/NY-Sun/Solar-for-Your-Home/Community-Solar/Solar-for-All>.

¹⁶ Joule Order, p.22.

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

Municipality. Sustainability funds drive investment in locally identified projects and initiatives aimed at addressing community needs and established goals. Joule also supports municipalities in identifying investments which can act as multipliers, for example, seed funding leading to further investments.

To date, the sustainability funds Joule has created on behalf of its client municipalities have earned more than \$55,000 representing a wide range of projects such as stormwater management, sustainability curricula in local schools, refrigerant management, bike trails.¹⁷

Joule will employ the same model for the Opt-Out CDG Program in Participating Municipalities. The aim with these initiatives is to empower communities to direct funding where it can be most supportive and have the maximum impact.

3 Project Sourcing

Privately developed CDG solar projects will be the primary pipeline of capacity to serve the Program. In parallel, however, Participating Municipalities will seek to maximize Program value by pursuing project origination within municipal boundaries. Joule has and will continue to consult Program Municipalities to identify and prioritize:

1. potential municipal sites for CDG development (brownfield, greenfield, and rooftop).
2. potential sites on private land within municipal boundaries; and
3. leasing and/or financing options for projects on municipal sites

Open Procurement

Joule intends to issue a Request for Qualifications (RFQ) to active CDG Sponsors in Niagara Mohawk service territory. The RFQ is designed to identify available CDG resources, collect information about CDG Sponsors and projects, and solicit feedback. Respondents will be qualified based on Sponsor capability, project viability and maturity, tolerance for terms of proposed partnership structure (term sheet).

We intend to then issue a Request for Proposals (RFP) to qualified CDG Sponsors. Participating Municipalities will offer a commitment that accepted projects will remain as a default supplier of Credits for a specified period.

[REDACTED] The intent of this construct is to provide all consumers with the same quality product.

The RFP will establish project compliance criteria and request detailed project information, [REDACTED]

¹⁷ See <https://www.joulecommunitypower.com/results> for details on Joule sustainability funds.

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

[REDACTED]

Joule will prepare and present options, recommendations, and results to officials of Participating Municipalities, including a detailed deployment timeline and impact on local and state renewable energy and economic development goals.

Magnitude of Projects

Joule and Participating Municipalities intend to contract exclusively with CDG solar projects. Joule projects the number of Program Customers in the Participating Municipalities (after the opt-out period) to be roughly 3200. Based on Joule sales data with regards to average subscriber allocation and project production, we expect that 20MW_{AC} of solar CDG in Niagara Mohawk territory will safely cover all Program Customers. Thus, Joule and Participating Municipalities will contract with a minimum of 4 CDG projects and at least one CDG Sponsor counterparty.

[REDACTED]

Agreements will go into effect when applicable project(s) reach COD. Standard contractual terms will be publicly available and posted. Individual contracts will consistently align with standard contractual terms, under RFP conditions.

4 Enhanced Outreach Plan

The integration of CDG requires additional outreach and education to the existing standards for electricity supply CCA programs, as established in the Master IP and Appendix B.

Additional CDG outreach will be conducted in a two-phase approach. The first phase will focus on education and information. Consumers will be informed about Program structure and benefits (i.e. local economic development, long term guaranteed savings, and environmental impacts) through a variety of media channels. Program communications will make it clear that anyone may opt out of their CDG subscription at any time and without penalty. This phase will continue throughout the opt-out period. After launch a second and sustained outreach effort will aim to facilitate a community-wide dialogue about the

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

Program vision and desired outcomes, particularly with reference to the sustainability fund. This will be conducted in close cooperation with the municipality, local sustainability and social justice groups.

Public outreach will consist of a diverse communications campaign to community leaders and local stakeholder groups, as well as directly to consumers. All the costs for public outreach (excluding municipal staff time) will be shouldered by Joule and its partners. Materials will be distributed with special consideration of low-income consumers and non-English speakers. Core outreach materials will be available in both English and Spanish.

A summary of potential outreach activities is detailed in the template below.

Table 1. Integrated Outreach Plan Template

Outreach	Description
Public events	At least three presentations and public Q&A, preferably with local officials in attendance. First forum will focus on educating the community on program structure and benefits, the second on consensus-building around Program goals and priorities. The third will precede the Opt-Out CDG Notification Mailing, disclosing the details of the Opt-Out CDG Program, including project information, timeline for application of Credits, discount %, subscriber rights and options. Events will have virtual attendance options. Virtual attendance will be publicly accessible through a video conferencing platform (e.g. Zoom, Webex), and attendees will have options to ask questions during or after the presentation. Events will be recorded and made publicly available thereafter (e.g. on a Joule YouTube channel).
CDG site tours	Interactive opportunities for education and networking. Virtual tours may be made available if in-person attendance is not available. Narrated videos showing the projects and highlighting points of interest on technology and engineering.
Ribbon-cutting events at CDG project sites	Opportunity for local press coverage, recognition for all Program stakeholders, particularly around the CDG projects and uses of the sustainability funding. Will be broadcast publicly through video conferencing platform if in-person events are not possible.
Workshops, conference and community presentations	Support public education efforts focused on CDG but also on the wider sustainability efforts within the community.
Feedback form	Print and web forms soliciting community comments on program priorities.
Educational materials	Printed and/or digital materials suitable for distribution by email, municipal websites, LinkedIn, Facebook, via video conferencing platforms such as Zoom, or in-person (flyer, brochure).
Educational video	Short 2-3 min video explaining CCA, CDG and what Program means for residents. Can be posted on social media, program landing page, municipal website, YouTube or other public file sharing sites.
FAQ and call script for Contact Liaisons	Reference guide for incoming questions.
Social media and blog posts	Creation of Facebook group for open discourse about the Program.
Local press coverage	Regular updates and interview opportunities provided to local press, resulting in multiple articles in one or more local media outlets. In addition, Joule may produce one or more commentary/OpEd pieces.
Local event tabling	Program representation and materials available at farmers' markets, community festivals and fairs, school events, etc., as available with respect to COVID-19 guidelines.

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

Direct mail	Postcard to residences and small businesses in program municipalities directing to Program hotline, promoting upcoming events including public forums.
Newspaper/magazine ads	Identify salient outlets, optimal ad size, frequency and duration of campaign.
Radio ads	Local station radio ad campaign: ads/week, # of weeks.
Online landing page/contact form	Basic program information, educational video, and a form to sign up for email/text updates or to log in for Program Customer services.
Program hotline	Operates M-F 9-6.
Small business promotions	Offer incentives to small businesses to distribute materials and/or promote Program.

Opt-Out CDG Notification

A dedicated mailing describing the Opt-Out CDG Program structure will be sent to Program Customers (the “Opt-Out CDG Notification Mailing”) within Participating Municipalities. The Opt-Out CDG Notification Mailing will:

- a. be reviewed and approved by Participating Municipalities before mailing;
- b. be issued on municipal letterhead;
- c. inform Program Customers that they may be enrolled for a subscription to a local clean energy project, which earns subscribers monthly discounts on utility bills;
- d. be unequivocal in terms of consumer rights (free opt-out and/or cancellation);
- e. describe terms of the Program and CDG Subscription (including how savings are realized through bill Credits);
- f. describe the relationship to the default electricity supply offering, and options for dual or partial participation;
- g. be available in Spanish on the Program website and direct mailer will advise consumers of translation service options; and
- h. direct consumers to the Program website url and Program hotline number for more information.

The Opt-Out period will last 30 days, and a 3-day rescission period. Customers may opt out by any of the following methods:

1. webform via Customer Portal
2. pre-paid postcard (included in the Opt-Out CDG Notification Mailing)
3. Program hotline

The Opt-Out CDG Notification Mailing will be filed with the Commission at least five business days before mailing to allow Staff to review and comment. Subsequent CDG-specific Opt-Out Notifications will be filed separately with the Commission, in a similar fashion.

Joule is responsible for processing opt-outs and exporting CDG enrollment into allocation requests (i.e. assigning subscribers to CDG projects) to be submitted to National Grid.

In addition to the CDG Opt-Out Notification Mailing, Program policies will be clearly communicated on the Program website and online customer account management platform (“Customer Portal”), as well as in supplemental Program materials intended for distribution to consumers. Program staff will be trained and equipped with the necessary tools to answer consumer questions and execute desired action through the Customer Portal. We will test different messaging to explain the guaranteed savings. We currently articulate that assured savings are dependent only on whether the plant generates power or not and that savings amounts depend on individuals’ consumption.

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

Participating Municipalities will be asked to promote and endorse the Program and its offerings, take an active role in outreach and communication to the community (to distribute materials through municipal channels, host events, speak to local press), approve Program documents when municipal authorization is necessary, and execute agreements that meet municipal approval. We will also provide municipal staff with a FAQ document they can use to respond to calls that come directly to the municipal offices. We also intend to provide the ability for municipal staff to patch calls directly to our local Program staff.

Local Program Management

As CCA Administrator serving communities throughout New York State, Joule has developed a local partnership model to deliver consistent outreach and local on-the-ground support for consumers, as well as elected officials, staff, and other community leaders. The long-term success and sustainability of the CCA Program relies on the development of a durable community enterprise, whose primary function is to manage and grow the Program to better support consumers and serve local interests.

Joule has partnered with Roctricity, a Rochester-based business founded by sustainability professionals with the mission of advancing clean energy initiatives in the greater Rochester area. Roctricity serves in the Program Organizer role, as defined by NYSERDA, and provides local program support, education, and outreach. Roctricity will also serve in this role for the electricity supply offering, and serves in this role for all Joule administered CCA programs in Western New York and the Finger Lakes. Joule splits fees collected with Roctricity.

Roctricity will maintain the Program hotline operated from 9-6 M-F (and by appointment in off hours) throughout the term of the contract. From prior experience, we anticipate that call volume will be 10 or 20 times higher in the first two weeks after notification letters go out than it will at any other time throughout the life of the Program. Joule and Roctricity currently have sufficient staff to meet program requirements but with additional programs set to launch we are carefully monitoring our staffing needs.

It is our intention to drive all calls, questions, requests from the public directly to our dedicated local staff. We train staff to resolve any customer issue during the call, to the best of their ability. We don't view long average call times as an indicator of inefficiency, but rather just the opposite: as comprehensive, customer-centric service. We pride ourselves on patient and consistent education, and the reputation of the program as a whole rests on our ability to clearly and simply educate residents. Roctricity will take, record, and attempt to resolve customer complaints, including referring consumers to the appropriate authorities when formal action is requested.

After Program Launch

Joule and Roctricity will provide quarterly reports to Staff, as described in Section 6 below, which will be sent to Participating Municipalities, accompanied by executive summaries of Program progress. We will share qualitative data collected from CDG Sponsors and subscribers, updates on new projects, and new statewide resources.

Once local CDG partnerships are established, and cognizant of pandemic safety requirements, we plan to organize site tours of local projects, both for municipal leaders and residents, possibly combining the tours with presentations and "meet and greet" receptions. The launch of new projects will create ribbon-cutting opportunities for local celebrations including community leaders and press. Our CDG partners will also commit to communicating with the community through official Program notifications that will share updates, metrics and stories.

Multilingual Support

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Joule, as CCA Administrator, will receive information about utility customers that have identified a primary language other than English. Joule will prepare versions of the Opt-Out CDG Notification Mailing in English and Spanish, and, to the fullest extent possible, provide materials and customer support in the primary language of the consumer. Both versions will be made available on the Program website.

The Customer Portal will provide consumers with the opportunity to sign up for communications in their preferred language. The Program will provide direct support in both English and Spanish by phone. The Opt-Out CDG Notification Mailing will describe the availability of translation services and opportunities to receive future materials and Program information in another language.

5 Customer Data

Confidential Utility Data

Joule has entered into Data Security Agreement (DSA) with National Grid, and has authority to take custody of confidential utility information including customer-specific account information necessary for opt-out enrollment (e.g. account numbers (or customer proxy ID if available), historical kWh usage, ICAP tag). Joule has upgraded its systems and has complied with the Self Attestation (Exhibit) to the Data Security Agreement. Joule is in compliance with all requirements of the Self-Attestation

[REDACTED]

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[REDACTED]

Joule will maintain appropriate security for its systems. Joule has developed a secure confidential database with vendor [REDACTED]

Customer Portal, Security and Compliance

Joule maintains a Customer Portal that processes enrollment transactions and allows Program Customers to view and modify Program subscription status, account information including Credits received, savings, environmental metrics (though National Grid owns Tier 1 RECs generated by CDG assets), project information. The Customer Portal facilitates a more engaging user experience, enabling Program Customers to sign up to receive Program updates and notifications (in Spanish if requested), and request a record of any account changes made during the session. The Portal user interface uses clear language and design elements to maintain consumer protections and to abide by all regulatory requirements.

Program Customers will access the integrated Customer Portal through a single point of entry (and single credential) on the Program website. [REDACTED]

[REDACTED]

[REDACTED] We do not sell our customers' data to third parties and only use them for their intended purpose.

Data Transfer

Frequent automated data transfer and predictable application of CDG will vastly improve operational efficiency, customer value, and reporting accuracy. It is Joule's preference that utilities provide automated transfer of host meter data through secure FTP. The Program should exchange data with utilities in a scalable, automated and secure fashion to optimize the enrollment of customers and accounting/auditing of Credits and monthly usage/consumption data. Joule requests that if secure FTP is not possible, National Grid provides data through encrypted CSV to secure Joule email, or via utility portal no less frequently than every 30 days.

6 Reporting

Joule will submit annual reports to Staff and Participating Municipalities, compliant with both the CCA Framework Order and the Joule Order. The CCA Framework states annual reports must include, at a minimum:

1. number of customers served;
2. number of customers cancelling during the year;
3. number of complaints received by the CCA liaison;
4. commodity prices paid;
5. value-added services provided during the year;
6. administrative fees collected; and
7. number of customers who opted out in response to the initial opt-out letter.¹⁸

In addition to annual reporting requirements set forth in the CCA Framework Order, the Joule Order requires reporting for an Opt-Out CDG Program, at a minimum:

1. overall number of CDG projects;
2. number of CDG projects that began in that reporting year;
3. number of municipalities offering CDG Credits;
4. overall number of CDG subscribers;
5. number of complaints received by the CCA liaison related to CDG; and
6. number of customers who opted-out of the CDG membership¹⁹

Joule also intends to include the following metrics in its annual reports:

1. capacity of CDG projects;
2. CDG project production;
3. Credits sold (in kWh equivalent) and financial value of Credits by project and Participating Municipality;
4. customer migration in and out of CDG offerings; and
5. savings by municipality, project and average subscriber.

Annual reporting *may* also include related performance metrics such as:

1. engagement (e.g. Customer Portal activity, contacts submitted through contact form, attendance at events, review of local press coverage, calls/questions received, etc.);
2. DER enrichment (i.e. demand management, energy efficiency, electric vehicle, and/or storage programs; enrollment/participation; measured performance);
3. greenhouse gas emissions deferred;
4. municipal carbon intensity improvements; and
5. quantification of local development and economic impact.

Annual reports will be filed with the Secretary no later than March 31st for the previous year. Once CDG Credits are effectively incorporated into the Program and subscribers are receiving Credits on their utility bills, the Joule Order also requires quarterly reports to Staff forty-five days after the end of each quarter “demonstrating that CDG credits provided in that quarter exceeded CDG subscription fees charged in that quarter.”²⁰ Joule will act in full compliance of this requirement, and will provide transaction summaries of invoices sent and utility-provided billing data for Program Customers.

¹⁸ CCA Framework Order, p.46-47.

¹⁹ Joule Order, p.17.

²⁰ Joule Order, p.24.

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

7 Implementation Timeline

Below is a sample implementation schedule based on expected process steps and timings.

Table 2. Sample Implementation Schedule

Task	Timing	Comments
CDP Implementation Plan	Submitted 8/20/2020	Master Implementation Plan approved 3/2018. Plan to be reviewed and approved by Staff.
Prequalify Sponsors with RFQ	2-4 weeks	Joule reviews responses and delivers executive summary to Participating Municipalities. Concurrent with public outreach. See Section 3.
Public outreach	9 weeks+	Minimum 60-day outreach mandated by Commission. Continues via multiple channels and media through launch. See Section 4.
Aggregated data request	1-3 weeks	Follows public outreach. National Grid has 20 days to produce; Joule then prepares data for distribution to prospective CDG Sponsors.
RFP for CDG resources	4 weeks	Issuance following receipt of aggregated data. Gather information about distributed energy projects in Niagara Mohawk territory. Joule will analyze responses. See Section 3.
Recommendations of awards	1 week	Joule presents Participating Municipalities with RFP results and recommendations for awards to CDG Sponsors.
Finalize CDG Opt-Out Notification Mailing	1-2 weeks	Draft delivered by Joule to Participating Municipalities for review and approval. Joule submits to Staff for review and approval.
Customer contact data request	1 week	Upon award of RFP.
CDG Opt-Out Notification Mailing	5 weeks	Proofing and printer programming. 30-day opt out period.
Customer account data request	1 week	Upon close of opt-out period. Included account-specific historical usage.
Process opt-outs and enrollments	up to 9 weeks	Joule sends allocation requests. National Grid has 60 days to apply to Program Customers' accounts.
Program Launch		Customers begin receiving Credits.

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Attachment B.1.1. Sample Standard Disclosure Form



[Provider Name (the "Provider"), Address, Telephone Number, Email Address, and Provider Logo]

Joule Assets, Inc. (the "Program Administrator"), 22 Edgemont Rd, Katonah, NY 10536, (914) 977-3444, info@joulecommunity.com

Community Distributed Generation Disclosure Form	
Customer Information	[Include Name, Service Address, Mailing Address (if different), and Contact Information (if available)]
Distribution Utility	Niagara Mohawk Power Corporation
Overview	This document describes your Community Distributed Generation subscription.
Price, Fees, and Charges	<p>Cost to Enroll: \$0 Discount: 10%</p> <p>You will receive a 10% discount on the solar credits allocated to you through your utility account. This will result in an annual reduction in your cost of electricity. This reduction will be shown as a deduction on your utility bill. There is no cost for participating in this Community Distributed Generation program.</p>
Project Location and Customer Allocation	<p>Project Location: XXX Project Size: XXXX</p> <p>Customer Allocation ("Subscription Size"): XXX</p> <p>Anticipated Project Operation Date: XXXX</p> <p>If a Project with an earlier anticipated Project Operation Date becomes available, we may assign you to that Project and notify you in advance.</p>
Length of Agreement and Renewal	<p>Subscription Term: Up to [25] years. If you would like to cancel your subscription for any reason, you may do so at any time by following the guidelines below (under "Early Termination").</p>
Early Termination	Once enrolled, you may terminate your subscription with no penalty by contacting Program Administrator or Provider. Please allow up to three (3) months for the subscription to be removed from your account. Your subscription may be terminated if your utility account is suspended or closed.
Estimated Benefits	<p>Your utility will allocate bill credits for the energy generated by your Subscription Size. Your savings will be equivalent to the value of bill credits multiplied by your Discount. Estimated Annual Energy for your Subscription Size: XXX</p> <p>Bill Credit Type: Monetary Net Credits (based on Value Stack)</p>
Guarantees	You will receive a 10% discount on the solar credits allocated to you on your utility account. However, this does not guarantee a minimum savings on your utility bill every month. Because the energy generated by the solar project will vary each month, the amount of savings realized on your utility bill will also vary.
Data Sharing and Privacy Policy	The New York State Public Service Commission has authorized the Program Administrator and the Provider, or their agents, to receive information about your utility account, and may include, but not limited to: account holder personal information, information about meters and service classification, historical consumption, billing and credit information, and low-income status. Except for these parties, this information will not be shared with third parties.
Customer Rights	If you have inquiries or complaints that the Provider or Program Administrator is unable to resolve, you have the right to call the Department of Public Service Helpline at 1-800-342-3377. You may file a complaint on the Helpline or by following the instructions at http://www.dps.ny.gov/complaints.html .
Other Important Terms	Your Subscription Size may be adjusted, as needed, to better reflect your annual electricity consumption expectations.

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

Attachment B.1.2. Municipal Resolutions



VILLAGE OF BROCKPORT

127 Main Street · Brockport, New York 14420
Telephone (585) 637-5300 · Fax (585) 637-1045
Website: www.brockportny.org

*The Victorian Village on the Erie Canal
Preserve America Community
Listed on the State and National Registers of Historic Places
Certified Local Government
Tree City USA Community
Erie Canalway Heritage Award of Excellence
NYS Climate Smart Community
NYS Clean Energy Community*

RESOLUTION - VILLAGE OF BROCKPORT

At a meeting of the Board of Trustees of the Village of Brockport, Monroe County, New York state held at Village Court at 49 State Street Brockport, NY 14420 on February 3, 2020 the following resolution was regularly made, seconded and carried:

PRESENT: Mayor Margaret B. Blackman, Trustee/Deputy Mayor John D. LaPierre,
Trustee Annette M. Crane, Trustee Shawn Halquist

EXCUSED: Trustee Katherine J. Kristansen

MOVED BY: Trustee Crane **SECONDED BY:** Trustee LaPierre

CARRIED 4/0 to adopt the following resolution:

Whereas, New York's Climate Leadership and Community Protection Act went into effect on January 1, 2020 setting a road map for the State of New York, in accordance with the New York State Energy Plan, to produce 70% of its electricity from renewable sources by 2030, and 100% of its electricity from renewable sources by 2040;

Whereas, the Village of Brockport ("**Municipality**") wishes to transition its community to using electricity that is generated entirely from renewable non-carbon emitting sources;

Whereas, effective April 21, 2016, the New York State Public Service Commission ("**PSC**") issued an "Order Authorizing Framework for Community Choice Aggregation ("**CCA**") Opt-Out Program" in Case #14-M-0224 "authoriz[ing]" the establishment of CCA programs by municipalities statewide (the "**CCA Framework Order**");

Whereas, CCA provides a mechanism for municipalities in the State of New York potentially to, among other things, take control of their energy supply and consumption, reduce costs, reduce carbon emissions, and move to 100% renewable sources of electricity;

Whereas, effective March 16, 2018, the PSC issued an "Order Approving Joule Assets [Inc., ("**Joule**") Community Choice Aggregation Program with Modifications" (the "**Joule Plan**") in Case #14-M-0224 "approv[ing] Joule's proposed CCA Program with modifications" (the "**Joule Order**");

Whereas, effective July 17, 2015, the PSC, in a Proceeding on a Motion of the Commission as to the Policies, Requirements and Conditions for Implementing a Community Net Metering Program, Case 15-E-0082, issued an "Order Establishing a Community Distributed Generation ("**CDG**") Program and Making Other Findings";

Whereas, CDG is currently implemented in New York on an opt-in basis by agreement between a subscriber and the CDG Developer;

Whereas, existing CDG programs require subscribers to make payment for CDG to a CDG developer/owner, and in exchange, subscribers receive a credit on subscriber's utility bill;

Whereas, the Joule Order permitted Joule to offer Community Distributed Generation on an Opt-out basis ("**Opt-Out CDG**");

Mayor Margaret B. Blackman
Trustee/Deputy Mayor John D. LaPierre
Trustees Annette M. Crane, Shawn Halquist, Katherine J. Kristansen

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

Whereas, Opt-Out CDG is a powerful mechanism from municipalities to catalyze the development of local renewable power plants;

Whereas, on October 2, 2017, the Village of Brockport ("**Municipality**") adopted local legislation, Local Law 1 - 2017, A Local Law to Establish a Community Choice Aggregation Program in the Village of Brockport, enabling a Community Choice Aggregation Program ("**Municipal Program**");

Whereas, on October 2, 2017, Municipality engaged the services of Joule as Program Administrator for the Municipal Program;

Whereas, Joule administers the Municipal Program with support from Roctricity, LLC as Local Organizer;

Now, wherefore, it is hereby Resolved that the Municipality authorizes Joule to enter into negotiations on Municipality's behalf, with National Grid and one or more solar developers for a CDG program whereby residents and businesses would pay for and receive CDG credits on their National Grid bill; and

It is further Resolved that the Municipality authorizes Joule to prepare a CDG program for approval by the Municipality and thereafter for submission to and approval from the New York State Department of Public Service; and

It is further Resolved that the Mayor is authorized to enter into any agreements on behalf of the Municipality in relation to a CDG program consistent with this resolution in the Mayor's reasonable discretion.

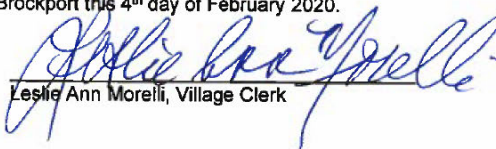
BY ORDER OF THE Village Board of the Village of Brockport
STATE OF NEW YORK)
County of Monroe) SS:

I Leslie Ann Morelli, Village Clerk of the Village of Brockport, do hereby certify that the foregoing is a full and true transcript of a resolution duly adopted at a meeting of the Board of Trustees of the Village of Brockport, Monroe County, New York on February 3, 2020 as it appears in the minutes of said meeting was regularly called and duly constituted, and that a quorum was present.

Witness my hand and the seal of the Village of Brockport this 4th day of February 2020.

Seal




Leslie Ann Morelli, Village Clerk

Appendix B: Finger Lakes/Western New York Community Choice Aggregation Program

RESOLUTION

Resolution made by Jerry Warsaw, seconded by John Correll to approve resolution in support of preparing a proposal for an Opt-Out CDG Pilot Program that would allow village residents to obtain electricity from a solar array and result in a cost savings in their National Grid bill.

Whereas, in June 2019, the New York State Senate and Assembly enacted the Climate Leadership and Community Protection Act, that sets a road map for the State of New York, in accordance with the New York State Energy Plan, to produce 70% of its electricity from renewable sources by 2030, and 100% of its electricity from renewable sources by 2040;

Whereas, the Village of Lima ("**Municipality**") wishes to transition its community to using electricity that is generated entirely from renewable non-carbon emitting sources;

Whereas, effective April 21, 2016, the New York State Public Service Commission ("**PSC**") issued an "Order Authorizing Framework for Community Choice Aggregation ("**CCA**") Opt-Out Program" in Case #14-M-0224 "authoriz[ing]" the establishment of CCA programs by municipalities statewide (the "**CCA Framework Order**");

Whereas, CCA provides a mechanism for municipalities in the State of New York potentially to, among other things, take control of their energy supply and consumption, reduce costs, reduce carbon emissions, and move to 100% renewable sources of electricity;

Whereas, effective March 16, 2018, the PSC issued an "Order Approving Joule Assets [Inc., ("**Joule**") Community Choice Aggregation Program with Modifications" (the "**Joule Plan**") in Case #14-M-0224 "approv[ing]" Joule's proposed CCA Program with modifications" (the "**Joule Order**");

Whereas, effective July 17, 2015, the PSC, in a Proceeding on a Motion of the Commission as to the Policies, Requirements and Conditions for Implementing a Community Net Metering Program, Case 15-E-0082, issued an "Order Establishing a Community Distributed Generation ("**CDG**") Program and Making Other Findings";

Whereas, CDG is currently implemented in New York on an opt-in basis by agreement between a subscriber and the CDG Developer;

Whereas, existing CDG programs require subscribers to make payment for CDG to a CDG developer/owner, and in exchange, subscribers receive a credit on subscriber's utility bill;

Whereas, the Joule Order permitted Joule to offer Community Distributed Generation on an Opt-out basis ("**Opt-Out CDG**");

Whereas, Opt-Out CDG is a powerful mechanism from municipalities to catalyze the development of local renewable power plants;

Whereas, on July 11, 2017, the Village of Lima ("**Municipality**") adopted local legislation, LL#2 of 2017, Community Choice Aggregation Program, enabling a Community Choice Aggregation Program ("**Municipal Program**");

Whereas, on July 11, 2017, Municipality engaged the services of Joule as Program Administrator for the Municipal Program;

Whereas, Joule administers the Municipal Program with support from Roctricity, LLC as Local Organizer;

Now, wherefore, it is hereby **Resolved** that the Municipality authorizes Joule to enter into negotiations on Municipality's behalf, with National Grid for an Opt-Out CDG pilot program whereby residents and businesses would pay for, and/or receive, CDG credits on a bill with National Grid; and

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It is further **Resolved** that the Municipality authorizes Joule to prepare an Opt-Out CDG pilot program for approval by the Municipality and thereafter for submission to and approval from the New York State Department of Public Service; and

It is further **Resolved** that the Mayor is authorized to enter into any agreements on behalf of the Municipality in relation to an Opt-Out CDG pilot program consistent with this resolution in his reasonable discretion.

Resolution unanimously approved.

BEN FREVERT: (Roctricity) Ben gave an overview of the community Distributed Generation Program to the audience. National Grid and Roctricity are working on a pilot program to provide 100% renewable energy with a 9% decrease in price on their National Grid bill to village residents.