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March 8, 2019

***VIA ELECTRONIC MAIL
ORIGINAL BY HAND DELIVERY***

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

*Re: D.P.U. 19-07
Investigation by the DPU on its own Motion into Initiatives to Promote and
Protect Consumer Interests in the Retail Electric Competitive Supply Market.*

Dear Secretary Marini:

Enclosed for filing please find the original and two copies of the Comments of the Cape Light Compact JPE (the "Compact") in the above-referenced proceeding.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Audrey A. Eidelman". The signature is written in a cursive style with a long horizontal flourish at the end.

Audrey A. Eidelman

AAE/drb
Enclosure

cc: Gregory Wade, Esq., Hearing Officer (via email only)
Margaret T. Downey, Compact Administrator (via email and first class mail)

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**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Investigation by the Department of Public Utilities)	
on its own Motion into Initiatives to Promote and)	
Protect Consumer Interests in the Retail Electric)	D.P.U. 19-07
Competitive Supply Market)	

COMMENTS OF THE CAPE LIGHT COMPACT JPE

I. INTRODUCTION AND BACKGROUND

The towns of Aquinnah, Barnstable, Bourne, Brewster, Chatham, Chilmark, Dennis, Edgartown, Eastham, Falmouth, Harwich, Mashpee, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, West Tisbury, Wellfleet and Yarmouth, and Dukes County, organized and operating collectively as the Cape Light Compact JPE (“Compact”), hereby provide the following comments to the Department of Public Utilities (“DPU” or the “Department”) in accordance with the January 18, 2019 Vote and Order Opening Investigation (“Vote and Order”) in this proceeding.

The Compact is a governmental aggregator under G.L. c. 164, §134 that provides energy services to consumers on Cape Cod and Martha’s Vineyard. The Compact maintains a business office at 261 Whites Path, Unit 4, South Yarmouth, Massachusetts, 02664. The purposes of the Compact include, among other things, to negotiate the best terms and conditions for electricity supply and transparent pricing for consumers on Cape Cod and Martha’s Vineyard and to advance consumer protection and interests for the residents of Cape Cod and Martha’s Vineyard.

First Amended and Restated Joint Powers Agreement of the Cape Light Compact JPE at Article II.¹

II. EXECUTIVE SUMMARY

Currently, the Compact provides all-requirements power supply to approximately 140,000 customers on Cape Cod and Martha's Vineyard. The Compact receives frequent inquiries from its customers regarding the competitive supply options available to them and is routinely considering ways in which to increase customer education regarding municipal aggregation and competitive supply. There are now upwards of 150 municipal aggregations approved and operational in the Commonwealth.² The Compact's comments are intended to encourage the Department to allow these municipal aggregation customers to benefit, similarly to residential customers on competitive supply, from the DPU's activities that promote customer awareness, transparency and informed decision-making. Towards that end, the Compact has focused its attention on questions one and three proposed by the DPU in the Request for Comments incorporated in the Vote and Order.³

III. COMMENTS OF THE COMPACT

On the issue of customer awareness, the Department requested comment on the types of general education activities that would be most effective to increase customer awareness of the value that the Competitive Supply Website (as such term is defined in the Vote and Order) can

¹ The Compact's Joint Powers Agreement is available online at <https://3jy14ha9u771r7qzn35g0s6c-wpengine.netdna-ssl.com/wp-content/uploads/2018/01/First-Amended-and-Restated-JPA-FINAL-12-13-17.pdf>.

² <https://www.mass.gov/info-details/municipal-aggregation#approved-municipal-aggregations->.

³ The Compact reserves the right to file reply comments or participate in further stakeholder engagement on all matters discussed in the Vote and Order should the Department provide for additional comment.

provide. Vote and Order at 15 (Question 1). The Compact strongly supports the Department's establishment of a Competitive Supply Website and any general education activities that would increase customer awareness of the value that this tool can provide to customers. The Compact believes the website provides useful information to customers and promotes transparency regarding pricing and competitive supply contract terms. However, the Compact believes that the Competitive Supply Website should also be a vehicle for competitive suppliers serving municipal aggregation load to provide information about their municipal aggregation product(s), should the municipal aggregator authorize such a listing. With an increasing number of municipal aggregations operational in the Commonwealth, it is important for municipal aggregators to be able to provide their product information to customers (both those new to the service territory and those already on the aggregated supply).

In addition, the Department questions whether it would be reasonable and appropriate to require the electric distribution companies to put information regarding the Competitive Supply Website on their bills. Vote and Order at 16 (Question 3). The Compact takes no position on the direct question. However, to the extent that the DPU intends to require this type of customer education, then the Compact respectfully requests that the DPU also allow municipal aggregators to post (or authorize their competitive supplier to post) their product information on the Competitive Supply Website. Without such customer education, municipal aggregation customers in receipt of a bill from the electric distribution company with links to the Competitive Supply Website may be confused about what electric supply options are available to them (or even what type of electric supply they are currently receiving).

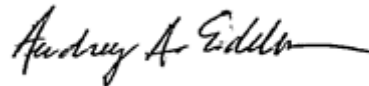
IV. CONCLUSION

The Compact appreciates the opportunity to provide comments in response to the Department's Request for Comments contained in the Vote and Order. The Compact looks forward to continued participation in the Department's investigation.

Respectfully Submitted,

CAPE LIGHT COMPACT JPE

By its attorneys,



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Dated: March 8, 2019