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March 8, 2019

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

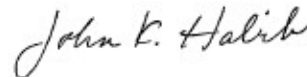
Re: Investigation by the Department of Public Utilities on its own Motion into Initiatives to Promote and Protect Consumer Interests in the Retail Electric Competitive Supply Market – D.P.U. 19-07

Dear Mr. Marini:

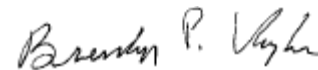
Enclosed on behalf of NSTAR Electric Company d/b/a Eversource Energy (“Eversource” or the “Company”) are the Company’s initial comments in the above-captioned matter.

Thank you for your attention to this matter. Please contact me should you have any questions.

Sincerely,



John K. Habib



Brendan P. Vaughan

Enclosures

cc: Gregory Wade, Esq., Hearing Officer



in competitive supply are well informed and are receiving clear information throughout the tenure of their engagement with a Competitive Supplier. Deceptive marketing practices in the retail energy market have plagued Massachusetts, creating significant customer confusion and resulting in customers getting locked into unfair financial deals. This issue expands beyond door-to-door marketing and includes telemarketing and direct mailings. It is pivotal that Competitive Suppliers be held accountable through strict enforcement rules.

The Company is fully engaged in customer awareness. NSTAR Electric responds to customer complaints regarding deceptive marketing by posting messages on its website, delivering messages via Twitter and providing customers with warning signs. Social media is used for continuous posting regarding awareness messaging. Additionally, the Company records its customer service complaints, including complaints relating to the actions of Competitive Suppliers, and shares complaints and concerns with the appropriate regulatory bodies in Massachusetts.

The Department must strive to increase transparency in the competitive supply process, and that sophisticated competitive suppliers in the marketplace must bear the burden of educating and informing consumers of their rights and obligations under a competitive supply contract. Competitive Suppliers should be required to clearly mark these education materials with their names, logos, trademarks and contact information, and should not use Eversource branding. The Company should not be forced to in any way promote competitive supply and the competitive supply marketplace as residential competitive supply customers generally pay more than customers receiving basic service.<sup>1</sup> Given that residential competitive supply can often be detrimental to the customer through higher rates or confusing and difficult contract terms,

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<sup>1</sup> See generally, “*Are Consumers Benefitting from competition? An Analysis of the Individual Residential Electric Supply Market in Massachusetts*” (March 2018).

requiring the Company, or other Electric Distribution Companies (“EDCs”), to assist in the education process regarding competitive supply or to otherwise promote competitive supply is simply inconsistent with the Company’s mission to make it easy for customers to do business with Eversource. Exacerbating this situation, and adding to customer frustration, is the fact that customers regularly contact Eversource reporting that they are unable to reach their Competitive Supplier in order to have their Competitive Supplier address their issues and questions. Absent changes discussed herein, the Company is not in a position to respond to specific questions regarding a customer’s competitive supply agreement and is incurring calls and costs to its customer service organization that are unnecessary.

That being said, the Company recognizes its role as a trusted energy advisor to customers in its service territory, and recognizes that the main way in which customers interact with the Company is through their monthly billing statement. Therefore, once a customer has decided to enter a contract with a competitive supplier, the Company believes strongly that it is important to provide information regarding a customer’s specific competitive supply offering on their monthly bill. As outlined below, it would be appropriate to provide the following information on residential bills if and when a customer chooses to take competitive supply: a comparison of the competitive supply rate to the basic service rate, the term of the Customer’s contract, any cancellation penalty included in the contract terms, and a phone number at which the customer can reach the competitive supplier with complaints.

However, the Company strongly believes that the obligation to provide key competitive supply information, as it pertains to a specific customer’s contract, lies with the Competitive Supplier serving that customers, and to that end recommends the Department to develop rules that will require Competitive Suppliers to provide thorough and accurate information to customers that

elect to take service under a Competitive Suppliers, and should use current or new regulations to punish deceptive behavior by bad actors in the competitive marketplace.

Further, the Company recommends that the Department adopt strict regulations that will govern Competitive Suppliers conduct in the marketing of electricity, including regulations that require the Competitive Suppliers to demonstrate that they are available to customers for questions regarding the customer's account, that timely provide the Company and EDCs with the information required to be added to customer bills, and enforce these regulations to the greatest extent possible in order to minimize the potential for deceptive door-to-door marketing and false or deceptive advertising by marketers. As outlined below, the Company feels strongly that the Department should review and enforce door-to-door marketing of Competitive Suppliers and should fairly punish bad actors under the Department's existing regulatory authority. Complaint information should be available publicly, so that consumers can know exactly what type of complaints other customers have against a given supplier or marketer. Finally, the Company recommends that the Department use its current authority, or promulgate regulations to assist its ability to protect Massachusetts consumers from deceptive trade practices and bad acts by participants in the competitive electric supply marketplace. The Department has the authority to issue penalties and fines to enforce complaints against Competitive Suppliers for (1) unauthorized initiation of generation service complaints (220 C.M.R. 11.07(3)(a)); (2) other complaints; and (3) allegations of unfair or deceptive trade practices (220 C.M.R. 11.07(4)(b)(2)), and the Company recommends that it do so where circumstances are appropriate.

### III. RESPONSES TO SPECIFIC DEPARTMENT QUESTIONS

1. *What types of general education activities would be most effective to increase customer awareness of the value that the Competitive Supply Website can provide (see Section II.B)? For each type of activity, identify the appropriate role of the Department, the distribution companies, the competitive suppliers, and other stakeholders.*

The Company actively engages in customer outreach regarding deceptive marketing practices. NSTAR Electric focuses on awareness and warning signs. Please see Attachment A for examples of this outreach. The Company proposes to continue relaying information to customers regarding the Competitive Supply Website. In addition to social media, the Company's Customer Service Representatives, during conversations with customers regarding supply and or rate changes, will advise customers to compare options using the Competitive Supply Website. Also, Eversource provides customers with a link to the Competitive Supply Website on the Company's website located on the "Choose an Electric Supplier" page.<sup>2</sup> The Company's "Choose a Supplier" webpage provides additional information regarding the choice between competitive supply and basic service, including a calculator that can be used to compare competitive supply offerings to basic service rates, and important questions the customer can ask regarding a Competitive Suppliers contract.

The Company's position is that suppliers, and not the Company, should bear the responsibility of providing their customers with accurate and easily comprehensible information of their specific customer offerings and their value proposition. Additionally, they should be responsible for the messaging the value of the Competitive Supply Website. Further, as outlined below Competitive Suppliers must provide materials in a variety of languages so that non-English-

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<sup>2</sup> <https://www.eversource.com/content/ema-c/residential/my-account/billing-payments/choose-competitive-alternate-supplier>

speaking customers (1) are not taken advantage of, and (2) have the same opportunity to read and understand their competitive supply contract as those customers who do read and speak English.

2. *Would it be reasonable and appropriate for the Department to require competitive suppliers to provide customers with information regarding the Competitive Supply Website through their marketing materials/scripts (see Section II.B)? If no, explain why not. If yes, identify the information (e.g., Website URL, number of participating suppliers, number of products listed) that would be most effective to increase customer awareness of the value that the Competitive Supply Website can provide.*

Yes, it is be entirely reasonable for the Department to require Competitive Suppliers to provide customers with information regarding the competitive supply website, through written or oral marketing materials. The Department should also note that there have been instances where various Competitive Suppliers, when interacting with customers, have misstated basic service prices (i.e. using a winter basic service rate when comparing summer prices) when soliciting customers.<sup>3</sup> Any such misrepresentation should be subject to strict penalties for deceptive marketing practices under the Department's regulations.

3. *Would it be reasonable and appropriate for the Department to require the electric distribution companies to put information regarding the Competitive Supply Website on their bills (see Section II.B)? If no, explain why not. If yes, identify the information (e.g., Website URL, number of participating suppliers, number of products listed) that would be most effective in increasing customer awareness of the value that the Competitive Supply Website can provide.*

No, it would not be reasonable or appropriate for the Department to require electric distribution companies to put information regarding the competitive supply website or Competitive Suppliers generally on their electric bills as a means of facilitating the marketing of competitive

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<sup>3</sup> PURA Investigation Into Direct Energy Services, LLC's Trade Practices, Docket No. 13-07-17, (Feb. 27, 2019 Draft Decision fining Direct Energy \$1.5 million dollars and banning direct energy from soliciting new customers).

supply options. The Company should not be responsible for advertising or marketing specific competitive supply options for several reasons:

- (1) The Competitive Suppliers are sophisticated entities that have the means and ability to notify and educate customers regarding the competitive supply website;
- (2) The Competitive Supplier market should bear the burden of paying for the necessary outreach. Any additions or changes to the customer bill print may result programming changes and additional costs;
- (3) Based on its experience in CT, the Company does not receive timely and accurate from Competitive Suppliers about their supply offers, which could create customer confusion if the Company is required to relay that information to customers;
- (4) There could be hundreds of different Competitive Supply offerings. It is not the electric distribution company's responsibility to track, publish and then respond to customer inquiries regarding competitive supply impacts.

Moreover, suppliers have not expressed interest in using distribution company bills or websites to promote their specific offers. In D.P.U. 09-46-B, the Department ordered the EDCs to implement model tariff provisions that allow Competitive Suppliers to "inform residential and small commercial customers in the Company's service territory of available electricity supply programs." See M.D.P.U. No. 4, § 11; M.D.P.U. No. 5, § 11. The Company charges a fee for this service pursuant to M.D.P.U. No. 4, § 11C. Since these tariff provisions were implemented in the 2009 investigation, no Competitive Supplier has requested to have its marketing information included on the Company's electric bills.

As noted above in response to Question 1, the Company provides general information regarding the competitive supply market on its website, including links to the Competitive Supply Website and Competitive Supply Calculator, and important questions to ask prior to selecting a competitive supplier. Further promotion of the competitive supply website and competitive supply generally should come from the sophisticated Competitive Suppliers, who should bear the burden of proving to customers that their product would add value to the customer.



4. *What other steps could the Department take to increase customer awareness of the value that the Competitive Supply Website can provide?*

The Department should \ make information about Competitive Suppliers, including the Competitive Supply website, more easily available on the Department’s website. Currently, to locate information on competitive supply, a user must navigate to the Department’s website, select “I want to...” and then “learn more about energy”, which is separate from “learn more about the electric and natural gas industry”, users must then select “Information for Consumers about the Electric Industry”, which takes them to a webpage with links to different topics.<sup>4</sup> While this page contains a link to the Competitive Supply website, it does not explain or list the current basic service rates, and how they could compare to Competitive Supply. This webpage could be expanded upon to provide information regarding competitive supply generally, and the benefits of the Competitive Supply Website. In essence, making the information readily and clearly available on the Department’s website could increase customer awareness.

5. *Would it be reasonable and appropriate for the Department to establish uniform requirements by which competitive suppliers would notify customers of the automatic renewal provision in their supply contracts (see Section II.C, above)? If no, explain why not. If yes,*

Yes, it is appropriate and reasonable for the Department to establish uniform requirements by which Competitive Suppliers would notify customers of the automatic renewal provision in their supply contracts. This would add more transparency to the process and would aid in customers receiving accurate and complete information from their chosen Competitive Supplier.

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<sup>4</sup> <https://www.mass.gov/information-for-consumers-about-the-electric-industry>

*(a) What information should competitive suppliers be required to provide to customers (e.g., the date on which the automatic renewal will take effect, the price and pricing structure to which the contract will automatically renew)?*

Requiring Competitive Suppliers to provide the following information to customers regarding the customer's competitive supply contract is of paramount importance:

- (1) Supplier Rate: the generation rate charged per kilowatt hour by the supplier;
- (2) Term: describes how many bill cycles the Supplier Rate will apply;
- (3) Expiration: the meter read date the Supplier rate expires;
- (4) Cancellation Fee: the fee for ending a supplier contract prior to its expiration;
- (5) Standard Service Rate: the current Eversource generation rate;
- (6) The date of the next Eversource generation rate change; and
- (7) Contact information for your electric supplier.

Providing this information will fully inform customers as to the nature and extent of their contract with a Competitive Supplier.

*(b) How long before the automatic renewal takes effect should competitive suppliers be required to provide such notification to customers?*

Based on the Company's experience operating in Connecticut, the Department should require Competitive Suppliers to advise their customers two billing cycles in advance of the automatic renewal date. This will allow the customer time to make an educated decision, time to contact their supplier to negotiate a new rate should they stay, choose another supplier or return to Eversource.

*(c) What method(s) should competitive suppliers be allowed to use to provide the notification (e.g., direct mail, e-mail)?*

Competitive Suppliers should be directed to use email and direct mail. Following the initial outreach, Competitive Suppliers should provide the Customer with a number of options, and should comply with the Customer's chosen preference.

*(d) If the contract would renew to a monthly-priced product, should competitive suppliers be required to notify customers on an ongoing basis regarding the price that will be in effect during the upcoming month? If no, explain why not.*

Yes, if a contract renews to a monthly-priced product, Competitive Suppliers should be required to notify those customers on an ongoing basis. This is because Customers on a variable rate, such as a monthly rate, might not realize their prices can increase and possibly never decrease. Further, as explained in response to Question 3 the Company supports providing customers with more information regarding their competitive supply choices, leading to a greater likelihood of the Customer making informed decisions.

One way that the Company can keep the customer informed of his or her billing rate is to include the Company's Basic Service rate on the bills for variable rate or month-to-month customers. This will allow customers to keep track of the differences between their competitive rate and the Company's rate.

*(e) What state(s) have established automatic renewal notification requirements? For each state, discuss the manner in which the state implements such a requirement.*

The Company is not aware of all states in which there is an automatic renewal notification requirement for Competitive Suppliers. However, the Connecticut Public Utilities Regulatory Authority ("PURA") requires that Competitive Suppliers include the "Next Rate" (i.e. the rate that will be assessed in an upcoming consumption period) to customers on bills before those charges are incurred by the customer to allow the customer time to opt-out of the upcoming rate. See Docket No. 14-07-19RE01, at 10. PURA ruled:

Therefore, the Authority concludes that Conn. Gen. Stat. §16-245d(a)(2) intended to show the customer the rate that will be assessed in an upcoming consumption period, not to inform the customer about a change in his generation rate after he begins incurring that rate in a consumption period that has already started. The

Next Rate must appear on bills before those charges are incurred by the customer to allow the customer time to negotiate a lower rate or opt out of the upcoming rate.

This ruling is directly analogous to the “automatic renewal requirements”, as it requires suppliers to provide information regarding the Customers upcoming rate so that the Customer could opt to change their rate accordingly.

Further, in Docket No. 14-07-19, PURA noted:

As a result of the Act and actions by the Authority **residential customers will be receiving generation-related information through multiple channels**. These include:

1. Information on the first page of the electric bill as directed herein;
2. Quarterly notice mailed directly by suppliers to each customer;
3. **Notice at the end of a fixed rate contract;**
4. **Notice when a supplier charges a variable rate;**
5. **Notice if a variable rate increases by 25% or more.**

In addition, the Authority is conducting Docket No. 14-07-17, PURA Development of Standard Summary Form of Material Contract Terms, in which it will develop the requirements for **displaying standardized generation-related information on all supplier contracts**

See Docket No. 14-07-19 at 10 (Jan. 25, 2015).

As explained in in response to Question 5.d, first and foremost, Competitive Suppliers should be responsible for providing this information to their own customers. It is possible that some of the above information can be included on the Customer’s bill provided to the customer by Eversource (as outlined below). If so ordered by the Department, the Company will redesign its bills in Massachusetts to provide customers with accurate information regarding the Customer’s competitive supply service, including the rate, and a comparison to basic service, the term of the contract, any cancellation fees, and the date on which the Contract expires or a new rate is set to take place. This will help the Company maintain its status as a trusted provider to its customers, and will help the Company’s customer service representatives in handling complaints regarding

competitive suppliers. The Company's experience in Connecticut to provide this information has been difficult, as it often does not receive the required data from Competitive Suppliers in a timely manner in order to get the information on a customer's bill. Therefore, the Company suggests that the Department make it a regulatory requirement, punishable by fines, for a Competitive Supplier to fail to provide necessary information to the Company at least two billing cycles in advance of said information appearing on a customer's bill.

6. *Would it be reasonable and appropriate for the Department to require the electric distribution companies use their monthly bills to provide information to competitive supply customers about the automatic renewal provision in their supply contracts (see Section II.C, above)? If no, explain why not. If yes,*

Although the Company is not in favor of using its monthly bills to market competitive supply options to customers, if and when a customer chooses a competitive supply option, it would be reasonable for the Department to require EDCs to use their monthly bills to provide information to competitive supply customers about their competitive supply rate and other information specific to that customer. Both the customer, and the Company, would then be in a much better position to understand the specific information about the competitive supply terms the customer has agreed upon with their supplier. The Company is, for most customers, the front-facing entity when it comes to residential electric service. The Company's bill is a prime communication tool with customers, and it is vital that the bill be transparent and provide the customer with the information needed to understand both their supply costs, and their obligation with their chosen Competitive Supplier. Customers contact the Company with complaints regarding Competitive Suppliers frequently, and often the Company is unable to assist its customers with these complaints because the terms of the contract are unknown to the Company. Requiring the Competitive Suppliers to provide timely and accurate information to the Company, so that the Company can provide this information to customers, would aid the Company in its mission to serve customers, and would

educate customers regarding how basic service compares to their specific competitive supply rate. It would also help customer service representatives address complaints.

As noted above, in Connecticut the Company had difficulty receiving accurate information regarding the “Next Rate” of customers, with Competitive Suppliers failing to provide the information in a timely manner, and so the Department should enact rules and regulations that require Competitive Suppliers to provide accurate information in a timely way to the Company, with penalties for failure to comply with said directives. This requirement should be in addition to those discussed above, as the Supplier should be required to notify its customers of automatic renewal provisions in contracts.

- a. What information should be provided through the bills (e.g., the date on which the automatic renewal will take effect, the price and pricing structure to which the contract will automatically renew)?*

As described above, the information provided through bills should include the following: (1) supplier rate; (2) comparison to basic service; (3) contract termination date; (4) the date on which the customer’s rate will next change; (5) whether a termination fee applies to this customer; and (6) contact information for the Customer’s Competitive Supplier.

- b. How often should the electric distribution companies be required to provide this information (e.g., on all bills to competitive supply customers for whom the supply contract includes an automatic renewal provision, only on the bill preceding the month in which the renewal takes effect)?*

The requirement to provide this information should only pertain to the residential market, as other classes of customers such as commercial or industrial customers likely have sufficient commercial incentive to track and be aware of their competitive electric supply rate. This information should be provided monthly to residential customers, and Competitive Suppliers should be required to provide it to the Company at least two cycles ahead. The frequency with which this information should be provided by Competitive Suppliers to customers should be based

on the Customer's statement date, and be provided on each residential statement with a competitive energy supplier.

- c. What other supply product-related information should the electric distribution companies be required to provide to competitive supply customers through the bills (e.g., early termination fees)?*

As described above, while Competitive Suppliers should be required to provide accurate notice to their customers regarding the specifics of competitive contracts, the Company can and will include the following on its residential electric bills to customers that have chosen a competitive supply option:

- Supplier Rate: the generation rate charged per kilowatt hour by the supplier;
- Term: describes how many bill cycles the Supplier Rate will apply;
- Expiration: the meter read date the Supplier rate expires;
- Next Cycle Rate: the supplier rate two billing cycles in the future;
- Cancellation Fee: the fee for ending a supplier contract prior to its expiration;
- Basic Service Rate: the current Eversource Basic Service rate;
- The date of the next Eversource Basic Service rate change;
- The total supplier charge to the customer that month;
- A comparison to what the customer's charges would have been using Basic Service;
- Contact information for your electric supplier; and
- Contact information on how to return to basic service.

The Company will need to receive this information from Competitive Suppliers at least two bill cycles in advance. Receiving this information from Competitive Suppliers has proven problematic in Connecticut, with the Company often not receiving required information from the supplier. Therefore, the Department should promulgate new regulations that require suppliers to provide this information in a timely way, with penalties for failing to do so. Lastly, it should be noted that additions or changes to the customer bill will require sufficient time to establish communication protocols and programming to update the bill presentment to include additional supplier information specific to a customer.

7. *How could the presentation of competitive supply information on electric distribution companies' bills be revised to provide competitive supply customers with improved awareness of their competitive supplier and their competitive supply product (e.g., a separate page dedicated to the competitive supply component of customers' electric service, the insertion of competitive supplier logos on the bill)?*

As described above in response to Questions 5 and 6, while the Competitive Supplier should be primarily responsible for providing accurate information to their customers, the Company should also have information about the competitive supply options chosen by its customers to allow the Company to present that information on the customer's bill and allow greater transparency to the customer about their chosen competitive supply rates and services. Should the Department require distribution companies to provide a customer's competitive supply terms on Company bills, the Department should adopt similar requirements to those outlined by PURA in Connecticut, or a variation similar to what is required by Connecticut. A sample bill from Connecticut is provided as Attachment B. Specifically, the Company recommends that there be a dedicated area that includes summary information regarding the Customer's Competitive Supply rate, with full cost recovery for any IT and billing refinements necessary to implement this requirement.

In order to avoid any potential for confusion, this bill-insert or bill amendment should not include the Competitive Supplier's logo or trademark.

8. *Would it be reasonable and appropriate for the Department to establish door-to-door marketing standards of conduct for competitive suppliers related to the disclosure of supply product information (see Section III.B, above)? If no, explain why not. If yes,*

Yes, in keeping with the Door-to-Door Marketing standards of conduct developed in Docket No. 14-140-G, it is appropriate for the Department to establish standards of conduct for Competitive Suppliers related to the disclosure of supply product information in Door-to-Door Marketing. Simply put, these regulations should be strengthened, and complaints of aggressive or



deceptive door-to-door marketing should be met with appropriate penalties for the offending Competitive Supplier and vigorously enforced by the Department.

The Company notes that both the Attorney General and the National Consumer Law Center have investigated the competitive electric supplier market in Massachusetts, and have found that (1) residential competitive supply customers have paid \$176.8 million dollars more than they would have paid had they been on the basic service rate;<sup>5</sup> and (2) that abusive sales practices harm low income customers in Massachusetts disproportionately, as 2017 data indicates that about half of Massachusetts' low-income electric customers received service through Competitive Suppliers, as opposed to other residential customers, where the rate of competitive supply adoption hovered near 37% - 42%.<sup>6</sup> These are very real and tangible issues which should be investigated by the Department and should be resolved through enactment or enforcement of strong regulations to protect consumers from unfair marketing attempts. The Department should examine the NCLC Report from April 2018, and consider changes to the way that low-income customers receive competitive supply, either by preventing Competitive Suppliers from enrolling low-income customers, or requiring Competitive Suppliers to never charge low-income customers a rate greater than basic service.

*(a) What supply product information should door-to-door marketers be required to disclose to customers?*

First, Competitive Supplier marketing material for door-to-door marketing should be subject to review and approval by DPU. If Competitive Suppliers do not comply with approved material, they should be subject to significant fines and penalties. the identity of Competitive

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<sup>5</sup> “*Are Consumers Benefiting from Competition? An Analysis of the Individual Residential Electric Supply Market in Massachusetts*” (March 2018) at viii.

<sup>6</sup> “Competing to Overcharge Customers: The Competitive Electric Supply Market in Massachusetts” (April 2018) at 8.

Supplier being represented by a door-to-door marketing agent should be announced, and it should be made clear that that the Competitive Supplier is not affiliated with the EDC. This information should be followed up by a third-party verification that makes it clear that the Competitive Supplier is not affiliated with and does not represent the utility.

Further, Competitive Suppliers should be required to disclose information regarding the contract terms entered into with the customer, including the length of the contact, provisions for automatic renewal, early termination fees, and how the Customer can return to basic service should they so desire.

*(b) Should the Department establish uniform language (and a uniform format) that suppliers would be required to use to disclose this information?*

Yes, the Department can and should establish a uniform list of information that suppliers are required to disclose to customers, and a uniform script that discloses this information. Such a disclosure requirement, through regulation imposed and enforced by the Department, will help ensure that residential customers are educated and that bad actors in the marketplace are held accountable to specific standards and requirements, thereby eliminating any grey area with respect to supplier marketing information. This information should be, by regulation, available and provided in a variety of languages, so that customers that do not read English are not taken advantage of.

*9. What other standards of conduct should the Department add to the door-to-door marketing standards of conduct established in D.P.U. 14-140-G?*

The Department should add the requirements discussed above, including marketing in multiple languages or ensuring that customers that do not speak English fluently are provided with information in their native language. The standards of conduct should be enforced, and complaints of violations of the standards of conduct should be punished.

10. *Would it be reasonable and appropriate for the Department to establish standards of conduct for marketing channels such as telemarketing and direct mail (see Section III.B, above)? If no, explain why not. If yes, identify the marketing channels for which the Department should establish standards of conduct and, for each marketing channel, discuss how the standards of conduct should differ from the standards of conduct for door-to-door marketing.*

Yes, the Department should establish standards of conduct for marketing channels such as telemarketing. For telemarketing, in addition to the standards of conduct outlined in D.P.U. 14-140-G Attachment 2, the Company requests that the cold calling marketers should not be able to use spoof numbers including the EDC's number and or Name in caller ID.

As outlined above, Competitive Supplier marketing material should include information such as:

- a. The cost of basic service;
- b. The terms and conditions of any contract, including the price, termination fees, and any variability;
- c. That the supplier does not represent the utility and is not affiliated with the utility;
- d. A direct number at which the customer can reach an individual representative of the Competitive Supplier, not a voicemail; and
- e. A contact number for the Department of Public Utilities Consumer Complaints.

The marketing materials should be clear and concise, and approved by the Department. The contract terms should be simple and easy to understand. Deviations from the approved marketing materials, when brought to the Department's attention, should be investigated and, if the investigation determines that non-approved materials were used or if other standards of conduct or regulations were violated, the Department should take appropriate action, including using its regulatory authority to issue fines against suppliers.

*11. Would it be reasonable and appropriate for the Department to expand the role of TPV to include confirmation that a competitive supplier has complied with the marketing standards of conduct (see Section III.C, above). If no, explain why not. If yes, should the Department establish uniform language that TPV service providers would be required to use to confirm that suppliers have complied with the marketing standards of conduct?*

Yes, the Department should establish uniform language that TPV service providers would be required to use to confirm that suppliers have complied with the marketing standards of conduct. As noted above, the TPV call should not be spoofed or hidden. The TPV should clearly and concisely explain that the Competitive Supplier does not represent the utility. As explained in response to question 10, Deviations from these TPV requirements, when brought to the Department's attention, should be investigated and, if the investigation determines that regulations were violated, the Department should take appropriate action, including using its regulatory authority to issue fines against suppliers.

*12. Would it be reasonable and appropriate for the Department to require competitive suppliers to periodically provide the Department with data on the types of marketing channels through which they have signed up customers (see Section III.D, above)? If no, explain why not. If yes,*

In order to verify and approve the marketing materials, the Department should require Competitive Suppliers to provide their marketing materials and data on their marketing activities to the Department.

*a. What data should competitive suppliers be required to provide the Department?*

The Competitive suppliers should submit information on all marketing channels used, where such marketing took place, and which agents or entities performed the marketing. The Supplier should also put forward proposed marketing materials to be approved by the Department, including proposed contract notifications and scripts to be used by marketing agents.

*b. How often should competitive suppliers be required to provide this data to the Department?*

This filing should take place bi-annually.

*13. How else could the Department improve its ability to investigate suppliers' marketing activities?*

As outlined above, the Department should establish uniform scripts for marketing and TPV. The Department should also approve marketing materials that are clear, concise, and understandable, and require the Competitive Supplier to provide marketing materials in languages other than English. These materials should be approved by the Department.

The Department could improve its ability to investigate suppliers' marketing activities by adopting regulations akin to those in Connecticut. Connecticut has enacted statutes that prescribe marketing behavior for Competitive Suppliers.

By way of example, Conn. Gen. Stat § 16-245o(h)(2)(B) states:

For door-to-door sales to customers with a maximum demand of one hundred kilowatts, which shall include the sale of electric generation services in which the electric supplier, aggregator or agent of an electric supplier or aggregator solicits the sale and receives the customer's agreement or offer to purchase at a place other than the seller's place of business, be conducted (i) in accordance with any municipal and local ordinances regarding door-to-door solicitations, (ii) between the hours of ten o'clock a.m. and six o'clock p.m. unless the customer schedules an earlier or later appointment, and (iii) with both English and Spanish written materials available. (emphasis added)

Conn. Gen. Stat. § 16-245o(f)(2) states:

No electric supplier shall provide electric generation services unless the customer has signed a service contract or consents to such services by one of the following: (A) An independent third-party telephone verification; (B) receipt of a written confirmation received in the mail from the customer after the customer has received an information package confirming any telephone agreement; (C) the customer signs a contract that conforms with the provisions of this section; or (D) the customer's consent is obtained through electronic means, including, but not limited to, a computer transaction.

Conn. Gen. Stat. § 16-245o(h)(2)(A) states that “for any sale or solicitation” a supplier or its agent must “provide a statement that the person does not represent an electric distribution company” in addition to identifying the supplier the marketer represents.

Conn. Gen. Stat. § 16-245o(h)(2)(A)(iii) requires suppliers to “explain all rates, fees, variable charges and terms and conditions for the services provided.”

The Public Utilities Regulatory Authority has used these statutes to vigorously investigate Competitive Suppliers and their marketing practices. It has used these statutes to levy fines against Competitive Suppliers that violate the prescriptive rules. The Department should consider adopting new regulations that specifically limit the ability of Competitive Suppliers to engage in specific deceptive behaviors.

The Department should also vigorously enforce all customer complaints that come out of marketing activities pursuant to 220 C.M.R. 11.07 et seq. The Department already has authority under these regulations to punish bad actors in the competitive supply space. The Company recommends that the Department consider investigations into allegations made by consumers of bad actions by Competitive Suppliers and levy appropriate penalties against those suppliers found to have engaged in unfair or deceptive trade practices.

*14. Would it be reasonable and appropriate for the Department to make competitive supplier complaint and/or performance information available to customers and other stakeholders? If no, explain why not. If yes,*

Yes, it is wholly appropriate for the Department to make complaint and performance information available to customers and to EDCs publicly. As noted above, this information will aid Customers in making informed decisions regarding their choice of Competitive Supplier. The Department does not currently provide this information to the public in a readily accessible manner.

The Department should also consider requiring Competitive Suppliers to report to the Department on Customer Service issues, such as call handle service levels and customer complaints.

*(a) Identify other state(s) that make this information publicly available; and for each state, discuss the usefulness of (1) the information that is provided and (2) the manner in which that information is presented.*

In Connecticut, consumers can file complaints about Competitive Suppliers online through PURA's website.<sup>7</sup> On the Connecticut PURA website, consumers can see whether Competitive Suppliers are actively marketing to consumers, which suppliers have had their licenses revoked, and which suppliers have had their licenses suspended.<sup>8</sup> For those suppliers where the license is suspended, revoked, or withdrawn, PURA includes a notation of the Docket Number and date for the decision revoking or suspending the license. Further, PURA's website contains complaint information for all regulated entities, including Competitive Suppliers online. A user can access

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<sup>7</sup> <http://www.dpuc.state.ct.us/PURACAIU.NSF/RevWebIntake?OpenForm>

<sup>8</sup> [www.dpuc.state.ct.us/electric.nsf/\\$FormByElectricApplicantsView?OpenForm&Start=1&Count=1000&ExpandView](http://www.dpuc.state.ct.us/electric.nsf/$FormByElectricApplicantsView?OpenForm&Start=1&Count=1000&ExpandView)

the total number of complaints, and what the complaints are for. Categories include but are not limited to: (1) billing, (2) deposit, (3) general complaints, (4) slamming, and (5) termination etc.<sup>9</sup>

*(b) Based on your response to (a), identify best practices for (1) determining which competitive supplier complaint and/or performance information should be made publicly available, and (2) presenting that information (stakeholders are welcome to provide a visual representation of such best practices).*

Competitive Supplier complaint and performance information should be made publicly available following an investigation by the Department that leads to the Department making a finding or ruling against the Company.

*15. Would it be reasonable and appropriate for the Department to direct the electric distribution companies to initiate competitive supply service during a customer's meter read cycle (see Section IV, above)? If no, explain why not. If yes,*

No, EDCs should not be allowed to initiate competitive supply service during a Customer's meter read cycle. Off-cycle drops and enrollments via Electronic Data Interchange ("EDI")<sup>10</sup> are currently not included in the Company's tariffs and would require extensive and extremely expensive programming changes. All enrollment and drops should be on cycle and follow Electronic Business Transactions ("EBT") Working Group standards.<sup>11</sup> Pursuant to the current EBT Standards, enrollments should remain on-cycle.

*16. Would it be reasonable and appropriate for the Department to eliminate the customer account numbers as required information on an enrollment transaction (see Section IV, above)? If no, explain why not. If yes:*

No. It is not reasonable and appropriate for the Department to eliminate the customer account numbers as required information on an enrollment transaction. The customer account

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<sup>9</sup> [http://www.dpuc.state.ct.us/PURACAIU.NSF/\\$FormWebWebComplaintsScorecardView?OpenForm&Start=1&Count=1000&Expand=1.6.2&Seq=5&scrollTop=100&scrollTop=100](http://www.dpuc.state.ct.us/PURACAIU.NSF/$FormWebWebComplaintsScorecardView?OpenForm&Start=1&Count=1000&Expand=1.6.2&Seq=5&scrollTop=100&scrollTop=100)

<sup>10</sup> EDI is the automated process by which the EDCs and Competitive Suppliers enroll, drop, and change the enrollment status of Customers.

<sup>11</sup> The EBT Working Group developed the EBT Standards, which govern the EDI process discussed above.



number is a vital identifying marker used by the Company to personally identify a specific customer where a Competitive Supplier is seeking an enrollment. Eliminating the customer account number for enrollments opens the door to erroneous enrollments, as well as increased ‘slamming’, the term used for a Competitive Supplier or its agent submitting a request to provide service to a customer without that customer’s consent. By utilizing the account number along with the customer’s name key, the Company can ensure that the customer has made an affirmative decision to enroll with a supplier.

*17. What other rules may act as barriers to a more efficient competitive market? For each answer, propose ways to mitigate those barriers.*

Residential variable rates act as barriers to efficient competitive markets. It was found in Connecticut that residential variable rates were not benefitting customers. The state of Connecticut has eliminated variable rates, and requires competitive supply contracts to be at a fixed price for at least four-month increments. This ensures stability of bills over time and that consumers can make efficient and informed decisions about their supply needs.

*18. In what ways could the electric distribution companies better inform customers of their ability to prevent distribution companies from providing their account information to competitive suppliers and electricity brokers?*

Eversource sends a bill insert to all Massachusetts electric customers annually each November. This insert advises customers their information will be included on a customer list and that Competitive Suppliers may contact them regarding offers. If a customer does not wish to be included on this list, they have an option to contact the Company and their contact information will be removed from the list. In accordance with the Department’s Order in D.P.U. 16-10 “Order on Eligible Customers” issued on August 23, 2017, customers that do not want their account information included on the Customer Information List, will continue to have their information

shared with their city or town if it has a municipal aggregation program. The bill insert states as follows:

In order to expand the options available to electricity consumers in Massachusetts, the Department established guidelines for the compilation of a Customer Information List. Eversource makes this list available to competitive suppliers licensed by the Department for electricity marketing purposes only.

The Customer Information List includes the name on your electric account (corporate name, where applicable), your mailing and service addresses, monthly meter reading date, and rate class. In addition, your monthly kilowatt-hour usage (and demand where applicable) for the previous twelve months at your current location will be included. The list will be updated on a quarterly basis.

If you do not want your information included, please contact Eversource at 866-746-1110 (EMA) or 888-783-6608 (WMA). Customers in Eastern Massachusetts can also fill out an online form.

An exemplar bill insert is provided as Attachment C. Eversource also has information available on our website. If a customer does not wish to be included on this list, they have an option to contact the Company year-round and their contact information will be removed. This information is found on the “Choose An Electric Supplier” page under “My Account.” A copy of the November insert is also provided on the “Monthly Customer Communications” section under “My Account” and “About My Bill.”

The Company proposes that the Department formalize the “block” transaction list discussed in Question 19. This would allow the Company to modify the above-referenced bill insert to inform Customers that customers can request that a block be placed on their account and that once the block is on their account, they will not be able to be enrolled with a Competitive Supplier or municipal aggregator unless the block is removed.

*(19) Would it reasonable and appropriate for the Department to require the electric distribution companies to establish a “do not switch” list, which would preclude a company from switching a customer to a competitive supplier? If no, explain why not. If yes,*

Yes, it would be beneficial to Customers and to EDCs for the Department to formalize the “do not switch” process, which currently varies by EDC tariff.

*(a) Discuss the manner in which the “do not switch” list should be implemented.*

The Company implements a process to prevent a customer from being switched to a Competitive Supplier. Customers can contact the Company and request a ‘block’ be placed on their account. Once the block is in place, the customer cannot be switched from Basic service to a Supplier. When a customer requests a ‘block’ on their account, the account cannot be enrolled with a supplier unless the customer requests a removal of the ‘block’.

*(b) Identify other states that have established such a list, and, for each state, describe the manner in which the state has implemented the list.*

The Connecticut PURA ordered Connecticut electric distribution companies to establish a do-not-switch, or “block”, list to prevent customer enrollments and prevent the sharing of customer information with Competitive Suppliers. This requirement was established in Docket No. 13-07-18 (Nov. 5, 2014) at 33.

Many of the changes made above would likely require regulatory and possibly legislative change. However, the Department would not need to change its current regulations to enforce complaints against Competitive Suppliers for (1) unauthorized initiation of generation service complaints (220 C.M.R. 11.07(3)(a)); (2) other complaints; and (2) allegations of unfair or deceptive trade practices (220 C.M.R. 11.07(4)(b)(2)). Each of these complaint procedures authorizes the Department to subject Competitive Suppliers to “a range of sanctions for violations of the Department’s regulations.” 220 C.M.R. 11.07(4)(c). The Department has the mechanisms

in place to punish deceptive trade practices that injure consumers, and the Company respectfully requests that the Department avail itself of these tools when faced with unscrupulous actors in the competitive supply market.

Further, as outlined in response to Question 13, the Company recommends that the Department adopt specific and prescriptive regulations on the conduct of Competitive Supplier marketing. These specific guidelines will aid the Department in punishing unethical and unfair behavior in marketing, and will help consumers make informed decisions about their choice of electric suppliers.

- (20) *The issues raised in this NOI, and the questions presented above, relate solely to the electric competitive supply market for residential customers (see Section I, above). Would it be reasonable and appropriate for the Department to investigate any (or all) of these issues as they relate to the electric competitive supply market for small C&I customers? If no, explain why not. If yes, identify the issues that the Department should investigate, and for each issue, discuss whether the Department's resolution of the issue should differ between residential and small C&I customers.*

No, the residential market represents the mass market in all of Eversource's territory. Although small Commercial customers could benefit from the recommendation made above, it's the residential market that would benefit most.

- (21) *The issues raised in this NOI, and the questions presented above, relate solely to the electric competitive supply market for residential customers (see Section I, above). Would it be reasonable and appropriate for the Department to investigate any (or all) of these issues as they relate to the competitive gas market for residential customers? If no, explain why not. If yes, identify the issues that the Department should investigate, and for each issue, discuss whether the Department's resolution of the issue should differ between the electric and gas markets, and why.*

Yes, it would be appropriate for the Department to consider issues relating to the competitive gas market for residential customers. Specifically, the Department should investigate how competitive supply balances with current pipeline constraints and infrastructure challenges

impacts retail choice; how to best time customer migration; and how to ensure that marketers deliver what they nominate. The Natural Gas transportation sector has several aspects that are unique, and which should be addressed by the Department through a similar process. These, issues, and overarching concerns with the competitive gas market for residential customers, are discussed below.

For several decades now, customers have had the choice (with or without the assistance of a third-party marketer) to purchase and manage their own gas supply in Massachusetts. For most of this time, customers choosing competitive supply were larger, more energy savvy, commercial and industrial customers, having partial or full knowledge of the natural gas supply market and how it works. In recent years, residential growth has ballooned from 0 in 2010 to almost 8,000 today.

The Company's current tariff allows all ~289,0000 of its natural gas customers the option to elect transportation, in other words competitive supply, of which approximately 13,000 have elected to do so. This election can be made monthly, allowing the same customers the ability to move between marketers and/or Eversource, every single month.

Of the current total transportation customer population, the residential transportation sector has registered the most significant growth; while residential customers comprised approximately 1% of transportation customers from 2011 to 2015, that figure jumped to 29% in 2016, 43% in 2017, and 59% in 2018. The Company does not see any indication of this percentage shrinking in the near future. This is a concerning trend from several perspectives. The first being the same potential risks/concerns that the electric market has experienced in the residential space as sophisticated profit driven marketers interact with generally less energy-knowledgeable residential customers.

After years of applied use, the current Natural Gas Competitive tariff has exposed several areas where significant improvement is appropriate to reflect the current marketplace in New England. The primary areas of focus pertain to (1) tightening balancing limits given the current pipeline infrastructure challenges, saturation of key distribution areas and weather volatility; (2) more reasonable customer migration timing, addressing impacts related to residential growth cited above and reliability related to movement of large use exempt customers to default service prior to winter; and (3) deterring marketers from failing to deliver what they nominate by adding an associate tariff penalty. This action alone would reduce supply risk, price volatility and increase reliability by ensuring that the marketers bring in commensurate supplies associated with each and every one of their customers.

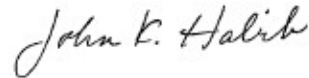
#### IV. CONCLUSION

The Company appreciates the opportunity to submit initial comments in this matter and looks forward to reviewing the comments of the other EDCs and interested stakeholders and continued participation in the remaining phases of this investigation.

Respectfully submitted by,

**NSTAR ELECTRIC COMPANY d/b/a  
EVERSOURCE ENERGY**

By its attorneys,



---

John K. Habib, Esq.  
Brendan P. Vaughan, Esq.  
Keegan Werlin LLP  
99 High Street, Suite 2900  
Boston, Massachusetts 02110  
(617) 951-1400

Dated: March 8, 2019

Residential | Business | About | Log In | Eastern Massachusetts

# EVERSOURCE

How can we help you?  
I Want To ... Search

My Account | Save Money & Energy | Outages & Storms | Safety | Switch to Gas

Eastern Massachusetts / Residential / My Account / Billing & Payments / Choose An Electric Supplier

## BILLING & PAYMENTS

- Account Overview
- Pay / View Bill
- View Usage
- Account History
- Other Ways to Pay
- Help Pay My Bill
- About Your Bill
- Choose An Electric Supplier
- Choose A Gas Supplier
- Electric Supplier Info

## MOVING & SERVICES

- SETTINGS

## CHOOSE AN ELECTRIC SUPPLIER

Eversource customers have the option of choosing a competitive energy supplier.

Your monthly bill is broken into two main charges:

- Supply:** The cost of electricity itself. Eversource or a supplier pays to purchase this energy on your behalf from a pool of multiple energy producers at the current market price. This price can go up and down.
- Delivery:** The cost of delivering electricity. This is what we charge to bring energy to your home or business and maintain a safe and reliable system.

You should be sure to evaluate factors such as the length and terms of a contract with a supplier, cancellation fees or other related information.

If you choose a supplier, their rates will go into effect on your next scheduled meter reading date, provided Eversource received notice at least two business days prior to the meter.

Eversource will still deliver power to your home or business, read your meter, care for the poles and wires, provide customer service, and restore power when there is a service interruption.

Also, Eversource will never go door-to-door to discuss your Eversource bill or energy supply options. Our employees always carry identification, and you can always call us to see if we have sent someone to your home.

You also have the option of blocking your electric account from authorized switching to a third-party supplier from Basic Service. Call us at 800-592-2000 to add this protection to your account.

Energy supply rates keep going up and down, and we don't like it any more than you do.

[Learn More](#) >>>

### AVAILABLE RESOURCES

The Department of Public Utilities (DPU) licenses competitive suppliers within the Commonwealth of Massachusetts and maintains a [list of current offers available from suppliers](#). This website also provides information to help you shop for a supplier that's right for you.


To see a list of competitive suppliers that may serve customers on your rate, visit our [Competitive Suppliers](#) page. You can also use our [Competitive Supplier Calculator](#) to compare an offer you receive with Eversource's Basic Service.

### Important Questions To Ask

When considering an offer from a supplier, here are some important questions you should ask before making a decision.

- What is the length of the contract?
- Is this a fixed or variable rate?
- Do early termination fees apply?
- Can I switch to another supplier?
- Who do I contact if I have questions?
- Are you licensed in the state, and what if I discontinue service in the region?

### RECOGNIZING AGGRESSIVE MARKETING TACTICS



Eversource customers continue to report receiving calls and visits from energy marketers misrepresenting themselves as Eversource employees.

These individuals may request to see a copy of your bill, offer discounted power or use other tactics such as authentic-seeming phone numbers, graphics, and uniforms to earn your trust.

A heightened awareness is critical to prevention and we're taking an active role to help protect our customers.

To help evaluate your energy supply options and recognize dishonest marketing tactics please keep the following tips in mind:

- Eversource does not call or solicit door-to-door on behalf of any competitive energy supplier. Customers are urged to always decline any door-to-door offers or requests to discuss energy rates from someone claiming to be an Eversource employee.
- Never provide personal or financial information to anyone, in person, on the phone, or online, without verifying their credentials even if the individual seems legitimate or knows basic account information.
- All Eversource employees carry company-issued identification, and any contractors working with us carry documentation explaining the nature and location of their work.
- Call Eversource to verify any offers or requests, but don't dial the phone number the individual provides. Always use our customer service phone numbers available on by visiting the [Contact Us page at Eversource.com](#).

### LARGE BUSINESS CUSTOMERS

After choosing a supplier, if you are currently a large commercial or industrial Basic Service Fixed rate customer up to three months of your past billing will be recalculated to reflect the month-to-month Basic Service Variable rate. This adjustment may result in either a credit or debit.

### CUSTOMER INFORMATION LIST

In order to expand the options available to electricity consumers in Massachusetts, the Department of Public Utilities (DPU) has established guidelines for the compilation of a Customer Information List. Eversource makes this list available to competitive suppliers licensed by the DPU for electricity marketing purposes only.

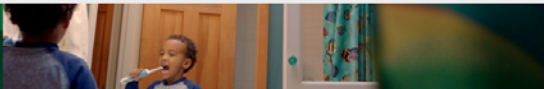
The Customer Information List includes the name on your electric account (corporate name, where applicable), your mailing and service addresses, monthly meter reading date, and rate class. In addition, your monthly kilowatt-hour usage (and demand where applicable) for the previous twelve months at your current location will be included. The list will be updated on a quarterly basis.

If you do not want your information included, please contact Eversource at 866-746-1110 or by filling out [an online form](#).

You also have the option of registering with the Federal Trade Commission's [Do Not Call list](#).



- BILLING & PAYMENTS -
- Account Overview
- Pay / View Bill
- View Usage
- Account History
- Other Ways to Pay +
- Help Pay My Bill +
- About Your Bill +
- Choose An Electric Supplier
- Choose A Gas Supplier
- Electric Supplier Info
- MOVING & SERVICES +
- SETTINGS +



## CHOOSE A NATURAL GAS SUPPLIER

Eversource customers have the option of choosing a competitive natural gas energy supplier.

Your monthly bill is broken into two main charges:

- **Supply:** The cost of natural gas itself. Eversource or a supplier pays to purchase this energy on your behalf at the current market price. This price can go up and down.
- **Delivery:** The cost of delivering natural gas. This is what we charge to bring energy to your home or business and maintain a safe and reliable system.

You can shop the competitive market and compare rates against Eversource's energy supply rate. This may offer an opportunity to manage your own energy supply costs.

You should be sure to evaluate factors such as the length and terms of a contract with a supplier, cancellation fees or other related information.

Eversource will still deliver natural gas to your home or business, respond to emergency calls, read your meter, care for the pipes delivering gas, and provide customer service.

Also, Eversource rarely makes unsolicited phone calls to customers, and would never solicit door-to-door on behalf of a competitive supplier.

Occasionally, as part of our natural gas marketing outreach, we do offer prospective gas customers the opportunity to switch to natural gas by leaving informational door hangers or visiting neighborhoods door-to-door.

We will send a letter notifying you that we will be in your area before visiting your neighborhood, and we will never ask to see a copy of your bill or discuss your current energy rate.

Our employees always carry company-issued identification, and you can always call us to see if we have sent someone to your home. Contractors working with us also carry documentation explaining the nature and location of their work.

If you no longer wish to be contacted by suppliers you can register with the Federal Trade Commission's [Do Not Call list](#).

### AVAILABLE RESOURCES

Each Competitive Power Supplier sets its own price for natural gas and provides service to various cities, towns and types of customers. [A list of these suppliers](#) is available.

### Important Questions To Ask

When considering an offer from a supplier, here are some important questions you should ask before making a decision.

- What is the length of the contract?
- Is this a fixed or variable rate?
- Do early termination fees apply?
- Can I switch to another supplier?
- Who do I contact if I have questions?
- Are you licensed in the state, and what if I discontinue service in the region?

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**Eversource MA**

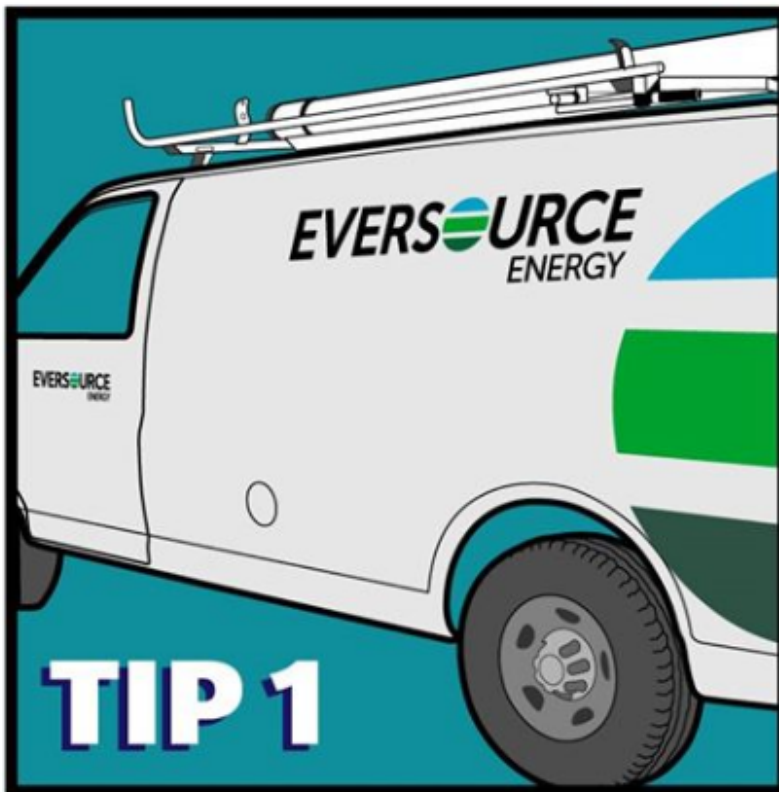
Published by Sprinklr [?] · 23 hrs · 🌐



Scammers target utility customers every day. During National Consumer Protection Week we want to remind our customers that all of our employees carry photo identification and field workers wear clothing with our logo and drive company vehicles. We're always working to serve you better and have more tips on how to avoid scams available on our website here:  
<https://bit.ly/2us09oB>.

# #stopscams

All Eversource employees carry photo identification; field workers wear company logoed clothing and drive company vehicles.





**Eversource MA** ✓

@EversourceMA



Scam Alert! If you received a phone call recently from someone pretending to be with Eversource, saying you are "eligible for savings" or trying to offer you discounted rate –this is NOT us. You can report scammers and deceptive marketers by contacting us directly at 800-592-2000

1:14 PM - 6 Feb 2019

8 Retweets 8 Likes



1 8 8 ||



**Eversource MA** ✓

@EversourceMA



⚠ Scammers target utility customers every day. Our reps will never demand instant payment over phone and employees always carry ID. For more info on utility scams & what to do if you think you're being targeted, check out this blog post from [@Mass\\_Consumer](#) [blog.mass.gov/consumer/massc ...](http://blog.mass.gov/consumer/massc ...)

1:07 PM - 27 Dec 2018

1 Retweet 1 Like

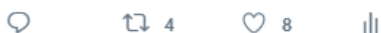




Beware of scams ⚠️: we keep hearing about individuals trying to sell "discounted power" to energy customers. They are NOT affiliated w/ us! Never share your personal info and if you question the validity of a call, hang up & 📞 us at 1-800-592-2000. #StopScams

5:07 PM - 11 Dec 2018

4 Retweets 8 Likes



Reminder: Individuals selling "discounted power" door to door or over the phone are not affiliated with us. If you feel as though you've been targeted by a scam, contact the MA Attorney General's Consumer Advocacy & Response Division Hotline at (617) 727-8400.

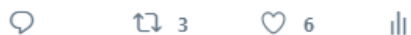


**Maura Healey** @MassAGO

Competitive energy suppliers often take advantage of seniors trying to save money on their bills. It's time to take them out of the market.

3:33 PM - 18 Oct 2018

3 Retweets 6 Likes



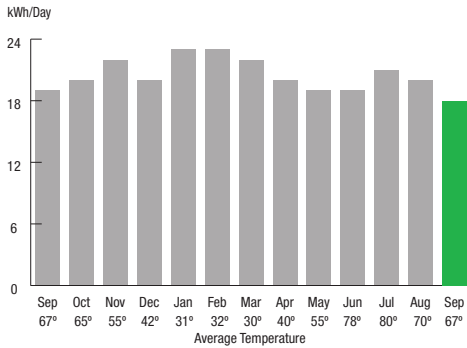
# EVERSOURCE

Account Number: **1234 567 8900**

Statement Date: 09/30/16

John J Customer  
 123 Any St  
 Any Town, CT 00000

## Electric Usage History - Kilowatt Hours (kWh)



## Electric Usage Summary

This month your average daily electric use was **25 kWh**

This month you used **4% less** than at the same time last year



**Total Amount Due by 10/28/16**

**\$151.00**

|                                   |           |
|-----------------------------------|-----------|
| Amount Due On 09/26/16            | \$168.00  |
| Last Payment Received On 09/23/16 | -\$168.00 |
| Balance Forward                   | \$0.00    |
| Total Current Charges             | \$151.00  |

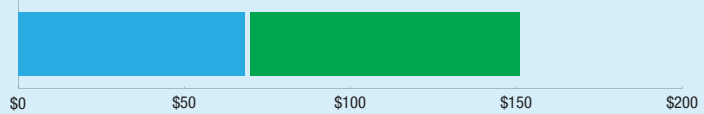
## Current Charges for Electricity

**Supply**  
**\$69.93**

Cost of electricity from Any Energy Co.

**Delivery**  
**\$81.07**

Cost to deliver electricity by Eversource



### Supply Information

Supplier Rate 9.990¢/kWh Fixed  
 Term: 13 cycles  
 Expiration: Dec 2016 meter read  
 Next Cycle Rate: 9.990¢/kWh  
 Cancellation Fee: \$0  
 Standard Service Rate: 6.606¢/kWh  
 Term/Expiration: 6 mos until Dec 31, 2016  
 Your Supplier Charge: \$69.93  
 Standard Service Comparison: \$46.24

### Your electric supplier is

Any Energy Company  
 Any Street  
 Any Town, Any State 00000  
 1-100-000-0000  
 To return to Standard Service, visit CT's official Rate Board at [www.EnergizeCT.com](http://www.EnergizeCT.com), Eversource.com or call 1-800-286-2000

## News For You

Welcome to your newly designed bill! This new design provides a clear view of your energy use and charges to help you manage your energy costs.

# EVERSOURCE

Account Number: **1234 567 8900**

The "Total Amount Due" must be received by Oct 28, 2016 to avoid a 1.00% late payment charge.

Seg Code

Remit Payment To: Eversource, PO Box 660032, Dallas, TX 75265-0032

Make your check payable to Eversource. Please consider adding \$1 for Operational Fuel. To add more, visit [Eversource.com](http://Eversource.com)

**Total Amount Due by 10/28/16**

**\$151.00**

**Amount Enclosed**



John J Customer  
 123 Any St  
 Any Town, CT 00000



Eversource  
 PO Box 660032  
 Dallas, TX 75265-0032

Sample Bill

00 0 0000118192 00 70 1234 567 8900

# EVERSOURCE

Account Number: **1234 567 8900**

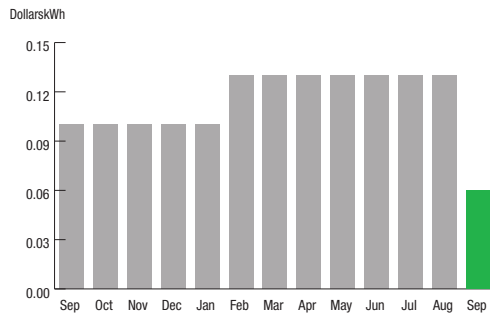
Customer name key: CUST

John J Customer  
123 Any St  
Any Town, CT 00000

**Service reference: 100000000 Billing Cycle: 01**  
**Service from 09/26/16 - 10/24/16 28 Days**  
**Next read date on or about: Oct 25, 2016**

| Meter Number | Current Read | Previous Read | Current Usage | Reading Type |
|--------------|--------------|---------------|---------------|--------------|
| 1234567      | 79765        | 79165         | 600           | Actual       |

## Supply Rate



## Contact Information

Emergency: 800-286-2000  
www.eversource.com  
CustomerServiceCTElectric@eversource.com  
Pay by Phone: 888-783-6618  
Customer Service: 800-286-2000

For information or questions regarding your account, please contact Eversource at the Customer Service number above. For other consumer questions and unresolved complaints, contact Public Utilities Regulatory Authority (PURA) Consumer Services toll free at 800-382-4586 or www.ct.gov/PURA.

**Total Amount Due  
by 10/28/16**

**\$151.00**

## Electric Account Summary

|                                   |                 |
|-----------------------------------|-----------------|
| Amount Due On 09/26/16            | \$168.00        |
| Last Payment Received On 09/23/16 | -\$168.00       |
| Balance Forward                   | \$0.00          |
| Current Charges/Credits           |                 |
| Electricity Supply Services       | \$69.93         |
| Delivery Services                 | \$81.07         |
| Total Current Charges             | \$151.00        |
| <b>Total Amount Due</b>           | <b>\$151.00</b> |

## Total Charges for Electricity

### Supplier (Any Energy Company)

|                          |                   |                |
|--------------------------|-------------------|----------------|
| Generation Srvc Chrg**   | 700 kWh X 0.09990 | \$69.93        |
| Subtotal Supply Services |                   | <b>\$69.93</b> |

### Delivery

|                                      |                   |                 |
|--------------------------------------|-------------------|-----------------|
| Transmission Charge                  | 700 kWh X 0.02922 | \$20.45         |
| Distribution Customer Service Charge |                   | \$19.25         |
| Distribution Charge per kWh          | 700 kWh X 0.03467 | \$24.27         |
| Revenue Adj Mechanism                | 700 kWh X 0.00079 | \$0.55          |
| CTA Charge per kWh                   | 700 kWh X 0.00116 | \$0.81          |
| FMCC Delivery Charge                 | 700 kWh X 0.00932 | \$6.52          |
| Comb Public Benefits Charge*         | 700 kWh X 0.01275 | \$8.93          |
| Distribution Adj Charge***           | 700 kWh X 0.00042 | \$0.29          |
| Subtotal Delivery Services           |                   | <b>\$81.07</b>  |
| <b>Total Cost of Electricity</b>     |                   | <b>\$151.00</b> |

**Total Current Charges**

**\$151.00**

## Explanation of your charges

\* The Combined Public Benefits Charge represents a combination of three charges formerly known as: Conservation and Load Mgmt Charge, Renewable Energy Investment Charge, and System Benefits Charge. This charge also includes the Conservation Adjustment Mechanism approved by the Public Utilities Regulatory Authority in Docket No. 13-11-14.

\*\* Effective January 1, 2007, the Generation Services Charge (GSC) and the Bypassable Federally Mandated Congestion Charge (BFMCC) have been combined into the "GSC Charge" listed in the Supplier Services section of your bill. The GSC reflects all of the cost of procuring energy from Eversource wholesale suppliers. The BFMCC portion of this line item is \$0.0003/kWh. If you multiply this BFMCC rate by the number of kWhs on your bill, you can calculate the dollar amount associated with the BFMCC.

\*\*\* Distribution Adjustment to be collected over 24 months beginning December 1, 2015, as a result of an accumulated deferred income tax adjustment.

# See It Report It



## *Your Community Needs Your Help*

If you happen to see a street light, traffic light, fire alarm box or any other electrical equipment in your neighborhood that looks like it has been damaged, or has exposed wires, please report it to Eversource at [800-592-2000](tel:800-592-2000).

Damage to electrical equipment located on sidewalks or streets can be caused by motor vehicle accidents and construction equipment. Incidents like this don't always get reported, so your help is needed in maintaining the safety of your neighborhood. Your information will be held in the strictest of confidence.

For more information about electric safety, visit [Eversource.com](https://www.eversource.com).

**EVERSOURCE**



NOVEMBER 2018

## An Important Message From the Department of Public Utilities Regarding the Release of Customer Information

In order to expand the range of competitive options available to electricity consumers in Massachusetts, the Department of Public Utilities (DPU) requires each electric distribution company to compile a Customer Information List. Eversource makes this list available to competitive suppliers licensed by the DPU. Competitive suppliers may use the information included on the list for electricity marketing purposes only.

### Information on the list

The Customer Information List includes the name on your electric account (corporate name, where applicable), your mailing and service addresses, monthly meter reading date, and rate class. In addition, your monthly kilowatt-hour usage (and demand, where applicable) for the previous twelve months at your current location is included. Eversource will update this list on a quarterly basis. By having your account information included on the list, you are improving the ability of competitive suppliers to offer you electricity related products and services. These products and services may provide savings, as well as other benefits that may be of interest. If you do not want your information included on the list, contact Eversource at the telephone number, website or address below. Eversource will remove your information from all subsequent lists. If you decide at a later date that you want your account information included on the list, you can contact Eversource using the information below.

Please include your name, account number, address and phone number in all correspondence.

**Eversource.com**  
**866-746-1110**

*If you have already contacted us to remove your information,  
there is no need to do so again.*