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Advancing Fairness in the Marketplace for All

July 19, 2019

Mark Marini, Secretary Department of Public Utilities One South Station Boston, MA 02110

RE: D.P.U. 19-07, Comments on Supplier Report Tables

Dear Secretary Marini:

Please accept these brief comments in docket number D.P.U. 19-07 regarding the revised Report Tables that were attached to the Department's July 2, 2019 memorandum regarding Shareholder Working Group Assignments.

1. Automatic Renewal Report Table

When contracts automatically renew, the supplier might introduce new terms or prices in the renewed contract. It is unclear how information will be recorded when a customer initially signs a fixed price contract, but then is automatically renewed into a monthly or variable rate contract. There may be a need for an additional column to record these contracts that were originally fixed price but did not automatically renew into a new fixed price contract.

When a fixed price contract does automatically renew into a new fixed price contract, it would also be helpful to know if the new fixed price is the same as the prior fixed price, or if it is higher or lower in the subsequent contract.

2. Enrollment Report Table

The Enrollment Report Table contains columns for customers who signed up "On-line." It would be helpful to separate this column into two columns, to indicate the number of consumers who signed up on line through the Department's Energy Switch website at energyswitchma.gov, and another column to list the number of customers who signed up through other websites. This may help the Department and others evaluate how suppliers and consumers are using the Energy Switch website compared with other marketing channels. It may also be useful to the Department and to municipalities if the numbers of consumers who enroll and who live in cities or towns with municipal aggregations were also reflected in this table.

3. Contract Pricing Report Table

Contracts often contain introductory fixed rates that change to monthly or variable rates after a specified number of months have passed. It would be helpful if the Department could clarify how records should be kept for customers who signed up for a contract that had a "fixed" price for part of the contract term but then changed to a monthly or variable rate for the remainder of the contract term.

Thank you for the opportunity to offer these comments.

Respectfully submitted on behalf of NCLC's low-income clients,

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cc: Greggory Wade, Hearing Officer dpu.efiling@mass.gov