

**From:** [Wade, Gregory \(DPU\)](#)  
**To:** [Efilig, DPU \(DPU\)](#)  
**Subject:** FW: MA DPU 19-07 - comments on proposed reports  
**Date:** Wednesday, August 7, 2019 10:46:56 AM

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**From:** Jennifer Spinosi [mailto:jennifer.spinosi@cleanchoiceenergy.com]  
**Sent:** Friday, July 19, 2019 4:45 PM  
**To:** Wade, Gregory (DPU); Lydia Scheel  
**Subject:** MA DPU 19-07 - comments on proposed reports

Greggory - Thank you for the opportunity to provide comments on the proposed report tables and for the revisions that Staff has already made to these documents. Based upon the request in the Hearing Officer Memo that such comments be sent to you via email, I believe that it is acceptable to provide informal comments via email, but if this understanding is incorrect please let me know. We can certainly reformat and file in the docket if necessary.

CleanChoice Energy's concerns and proposed solutions to the report tables are outlined below.

**Concern:** The proposed phrasing in Note 7 on the "Automatic Renewal Report" tab asks suppliers to provide "the number of customers who did not opt-out of the automatic renewal." However, the phrasing "did not opt-out" may cause some confusion among suppliers because while customers may choose a different product (and therefore not "auto-renew") or may cancel service entirely, they typically do not exercise an option to "opt-out" of automatic renewal.

**Solution:** Change Note 7 to call for "the number of customers who continued service on an automatic renewal rate."

**Concern:** The direction in Notes 6 and 9 on the "Automatic Renewal Report" tab asks suppliers to provide the number of contracts that "called for" an automatic renewal, either to a fixed-price product or variable-price product. In practice, a contract might allow a supplier to renew to a fixed or variable price. Further, it seems likely that the Department is more interested in what action was actually taken at the time of renewal, rather than what was permitted by the contract (particularly if the contract included multiple permissible alternatives).

**Solution:** Revise Notes 6 and 9 to capture the *action* (i.e. auto-renewal to a fixed rate, auto-renewal to a variable rate) of the Supplier, rather than what the original contract "called for."

**Concern:** The "Enrollment Report" tab may not capture all of the potential categories by which a supplier may enroll a customer. For example, a customer may sign up for service at a farmer's market or other in-person "tabling" type of marketing event that is not a door-to-door sale. It's unclear whether that type of sale should be captured under "On-line" (assuming the enrollment was completed by tablet) or should be reflected in a separate category.

**Solution:** Add a category of "Other" to capture those categories of marketing not captured by Door-to-Door, Telemarketing, Direct Mail, and On-line.

**Concern:** We understand that the goal of the “Contract Pricing Report” is to capture information about all residential customers. It seems that the intent is to determine the following: 1) of customers that originally signed up on a fixed price contract, what number are still being served on a fixed price product; 2) of customers that signed up on a monthly variable rate product, what number are still being served on a monthly variable rate product; and 3) of customers that originally signed up on a fixed price contract, what number are now being served on a variable monthly rate (and to further distinguish each of these categories by “all” customers and “L-I” customers). However, it appears that there might have been an error in duplicating use of 5 and 6 instead of 3 and 4 under the "Total Customers" column. Upon close review of this report, CleanChoice is concerned that we do not fully understand the information sought or how this report should be completed accurately.

**Solution:** CleanChoice does not have a specific recommendation about how to revise this report, but it would be helpful to better understand the information that the Department is trying to capture in order to provide more specific input on how such data can be best gathered.

Please let me know if you have any questions or if any of these issues need further clarification.

Kind regards,

Jennifer

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