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Via Electronic Filing and Hand-Delivery

March 5, 2020

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

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

Dear Mr. Marini:

Starion Energy, Inc. ("Starion") hereby submits this letter in support of the Retail Energy Supply Association's ("RESA") comments that were filed today in response to the Department of Public Utilities' ("DPU") February 5, 2020 Tier One Initiatives from docket D.P.U. 19-07. Starion is a retail electric and gas supplier that services residential, small business and commercial customers in Massachusetts as well as in eight other states and the District of Columbia. Starion, as an active stakeholder, is generally in support of the Tier One initiatives and believes that they are a result of all stakeholders working collectively and engaging in meaningful dialogue.

Starion is in agreement with RESA's support of the Contact Summary form and Customer Notification of Automatic Renewal proposals. Starion already sends contract summaries and renewal notices to its customers in Massachusetts and believes that these are useful tools in business and customer transparency. Starion would also like to echo RESA's objection to the proposed Competitive Supplier Reports for Automatic Renewals. The DPU has proposed that Competitive Suppliers report, on a quarterly basis, the number of customers that were automatically renewed, as well as, the total number customers that the Competitive Supplier was serving through an automatic renewal provision. However, Starion is not currently required to track this information in any of the jurisdictions in which it operates. Starion's existing system is not designed with these reporting requirements in mind and it may be difficult to accommodate producing these reports. Should the DPU require it, Starion would need to build the mechanisms for tracking this information, which would be expensive and burdensome. That expense would be ultimately borne by the customer.

Moreover, it is unclear to Starion as to what the DPU's goal is for collecting information on the number of automatic renewals – what is the goal the DPU looking to achieve? Starion believes that it would be in the best interest of the DPU, customers, and Competitive Suppliers to explore whether there is a better way to achieve the DPU's goals without requiring companies to build expensive new mechanisms for data tracking.

Starion would also like to expand upon RESA's comments regarding the Energy Switch website. Starion agrees that the website is a useful and customer-friendly tool. However, the website can be further improved by including more details for Competitive Suppliers' products. In particular, Energy Switch website could be updated to provide additional information about the resource type and general location of the facilities producing the renewable energy credits ("RECs") included in the products. For example, many customers would be interested in whether their energy is being sourced from Texas wind power or Massachusetts hydroelectric power. Currently, the website does not provide all of this information. As a result, customers cannot easily distinguish between or adequately compare renewable energy products.

For example, Starion offers two renewable green products in Connecticut. Starion's New England Green Power Plan provides one hundred percent (100%) renewable energy content, sourced from Connecticut low-impact hydro from small, run-of-the-river facilities, Massachusetts wind and solar facilities, and other New England small hydropower facilities.[1] Starion's EcoGreen product also provides one hundred percent (100%) renewable energy content but sourced from national wind RECs.[2]

However, if Starion were to offer both these products in Massachusetts, it would not be able to list them on the Energy Switch shopping website with any distinction in the product offerings. As a result, customers cannot adequately compare products. Starion is hopeful to launch its New England Green Power Plan in Massachusetts in the near future and wants to showcase it on Energy Switch. Starion wants to provide full information to the consumer regarding all of Starion's products, including these unique Green products. Starion supports enhanced transparency and ensuring that customers are appropriately informed about the renewable energy content of the energy they purchase. Enhancing the website so that customers can see the distinguishing characteristics of the various options available would empower customers to make informed choices and allow Massachusetts to reclaim a best-in-class shopping forum. Furthermore, Starion supports consistency of information between the product information disclosure form and the Energy Switch shopping website.

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[1] *See* New England Green Power Plan 2020 Prospective Product Content Label, https://www.starionenergy.com/ViewDocument.aspx?DocID=331&OfferRateID=3935 (last visited March 3, 2020) (provided as Exhibit A).

[2] *See* EcoGreen Disclosure Label, https://www.starionenergy.com/ViewDocument.aspx?DocID=336&OfferRateID=3570 (last visited March 3, 2020) (provided as Exhibit B).

Together with RESA, Starion seeks clarification regarding the definition of "telemarketing calls" as it relates to proposal of recording telemarketing calls. It is important to clarify what types of telephone calls will be required to be recorded so that Starion can take necessary steps to do so. Starion is in agreement with RESA's definition of telemarketing call being an unsolicited call, placed by the supplier (or its marketing representative), to a prospective or potential customer.

Lastly, Starion does not engage in door-to-door sales in Massachusetts and therefore does not provide comment as to the proposals for door-to-door sales.

All of these proposed changes can help the DPU meet its goals of increased customer awareness, proactive oversite, and improved operational efficiency. Starion applauds the work of the DPU and other stakeholders who have worked on these initiatives.

I certify that one original and two copies have been filed with the Department of Public Utilities. A copy has also been filed in electronic format as requested by the Department of Public Utilities.

Please feel free to contact me if you have any questions or require further information. Thank you.

Sincerely,

Shaina Rosenbleet

Exhibit A

New England Green Power Plan
2020 Prospective Product Content Label

STARION ENERGY

Starion Energy's New England Green Power Plan provides 100% renewable energy from generation sites in New England, including Massachusetts and Connecticut. The table below provides the projected resource mix for 2020, averaged annually.

Renewable Energy Source	Generation Location	Percentage
Wind Power	Massachusetts	64%
Solar	Massachusetts	1%
Small Hydropower	New England	25%
Small Hydropower	Connecticut	10%
Total Renewables		**100%**

These figures reflect the mix of Renewable Energy Certificates (RECs) that we have contracted or expect to provide. Actual figures may vary according to resource availability or other factors. We will annually report to you on or about August 1st the actual resource mix of the electricity you purchased for the prior calendar year.

Connecticut Comparison:
For comparison, according to the NEPOOL (2018), the average mix of Connecticut's energy generation is: Coal-fired (5%), Nuclear (31%), Oil (1%), Natural Gas (36%), Hydroelectric (23%), and Other (4%).

Massachusetts Comparison:
For comparison, according to the NEPOOL (2018), the average mix of Massachusetts's energy generation is: Coal-fired (5%), Nuclear (31%), Oil (1%), Natural Gas (36%), Hydroelectric (23%), and Other (4%).

The average home in the United States uses 879 kWh per month, [source U.S. EIA, 2018]

For more information, visit www.StarionEnergy.com or call us at (800) 600-3040.

Exhibit B

Your Electric Generation Disclosure Label from Starion Energy

PO Box 845, Middlebury, CT 06762
800-600-3040 | www.starionenergy.com

What is this label about?

It's about helping you compare the benefits of generation service offers Starion Energy to those of other competitive suppliers and to (Eversource or UI).

To our customers:

Electric generation service in Connecticut can be provided to you by licensed Suppliers, Eversource, or UI. This is a choice you can make. This Starion Energy disclosure label can be used to compare prices and other items (such as generation power sources and renewable sources) to those that other suppliers, Eversource or UI may offer you.

Important considerations in making your comparisons and choice:

- Ask the Supplier, Eversource or UI if its offer is **all-inclusive** or **not all-inclusive,** so you can make the right comparison and choice. Suppliers, Eversource and UI in Connecticut are required to disclose this information to you in their labels.
- An **all-inclusive** offer includes all charges and fees related to the generation portion of your electric bill included in the price of the Generation Service Charge (GSC). A **Not all-inclusive** offer **does not**; thus, there are other charges and/or fees that you would be assessed in addition to the GSC.
- Check any contract or agreement you are considering from a Supplier for specifics on price, such as whether pricing is fixed or variable, the term/ length of contract, and any other charges, enrollment fees, deposits or requirements for which you are responsible.

Other questions you can ask a potential supplier:

1. Is the Supplier licensed by the CT PURA?
2. Ask the Supplier to estimate your electric generation costs relative to Eversource/UI's and explain other possible benefits of switching your service. The average residential customer in CT uses 700 kWh per month. This would be a good comparison starting point. Some examples of the possible benefits are cost savings, budget certainty, risk management, product offerings and renewable energy.
3. How does the Supplier's all-inclusive price compare with the current Eversource or UI GSC charge?
4. Will the Supplier's price change when the Eversource or UI GSC price changes or is it fixed for the term of the contract/agreement?
5. If I switch to a Supplier, will my GSC charge still be on the Eversource/UI bill or will I receive a separate bill from the supplier?
6. If a Supplier issues a separate bill to me, will there be a late payment fee and, if so, what is the annual percentage charge?
7. Does the Supplier offer a choice of energy sources, such as renewable energy?
8. What is the Supplier's contact information if I have questions? Contact information should include the Supplier's phone number, customer service hours, mailing address and contact name.

The term of your service is **Fixed** for the Initial Term specified in your Contract Summary. Your all-inclusive rate is stated in your Contract Summary. Please refer to your Contract Summary and Terms of Service for Pricing and Term information.

Reminder: Your monthly electric bill also has a section for delivery service. This service is for the poles, wires, transformers and all of the other services to deliver electricity to your home or business. Delivery service charges do NOT include what you pay for your electric Generation Service in the GSC charge. You pay delivery service charges whether you buy your electricity from CL&P, UI or any other supplier.

EcoGreen Secure Plan Renewable Energy Content

If you choose our EcoGreen Secure Plan, Starion Energy will purchase Renewable Energy Certificates (RECs) that equal 100% of your electric usage, in addition to the minimum Connecticut Renewable Portfolio Standard. Contact us for more information.

Source	Percentage
National Wind RECs	100.00%

Power Sources	New England Power Pool System Mix
Coal	7.8%
Natural Gas	36.7%
Oil (Diesel, Jet, Oil)	6.2%
Nuclear	27.7%
Connecticut Qualified Renewable Sources	21.5%
Other, Misc.	0.2%
Total	

System Mix source: NEPOOL GIS Reports (Q3-2018 through Q-2 2019). Power Sources reflect the system mix, with the CT Class I & Class II renewable sources itemized separately in the chart.

CT Renewable Portfolio Standards Starion Energy Compliance				
	Class I	Class II	Class III	Total
Required 2019	19.5%	4.0%	4.0%	27.5%
Required 2020	21.0%	4.0%	4.0%	29.0%
Required 2021	22.5%	4.0%	4.0%	30.5%
Required 2022	24.0%	4.0%	4.0%	32.0%
Required 2023	26.0%	4.0%	4.0%	34.0%
Required 2024	28.0%	4.0%	4.0%	36.0%

About Power Sources

Your electricity is transmitted across the New England electric system, which receives electricity from power plants throughout the region to meet the requirements of all customers in New England. The "**New England Power Pool System Mix**" represents the percentage of power supply from each power source in the regional system. Suppliers are responsible for generating and/or purchasing electricity that is added to the electric system in an amount equal to your electricity use. To promote the development of renewable/clean sources, Connecticut, through legislation called the **Renewable Portfolio Standard (RPS)**, requires all Suppliers to acquire specific percentages of energy from renewable resources. CT RPS sources are defined as Class I, Class II and Class III. **Class I renewable** sources include solar power, fuel cells, methane gas from landfills, ocean thermal power, sustainable biomass, wave or tidal power, low emission advanced renewable energy conversion technologies, and certain run-of-river hydropower. **Class II renewable** sources include trash-to-energy, certain biomass facilities, and certain run-of-river hydropower facilities. Electricity generation from renewables has lower emissions and less of an impact on the environment than that produced from conventional fossil fuels. As an alternative to providing the RPS requirements a Supplier may pay an alternative compliance payment. **Class III** sources include CT commercial & industrial facilities using combined heat and power systems with at least 50% operating efficiency, a waste heat recovery system or electricity savings from energy efficiency measures.

Air Emissions from Power Sources

The air emissions listed below are produced when certain fuels are used to generate electricity.

Carbon Dioxide (CO_2) is released when coal, oil, natural gas, trash, methane and biomass are burned. Carbon dioxide, a greenhouse gas, is thought to be a major contributor to global warming.

Nitrogen Oxide (NO_x) is formed when fossil fuels, trash, methane and biomass are burned at high temperatures. They contribute to acid rain and ground-level ozone (or smog), and may contribute to respiratory illness. NO_x also accelerates vegetative growth in lakes and coastal waters which may lead to oxygen deprivation which is destructive to fish and other aquatic life.

Sulfur Dioxide (SO_2) is formed when fuels containing sulfur are burned, primarily coal, oil and trash. Health risks associated with SO_2 include asthma, respiratory illness and aggravation of existing cardiovascular disease. SO_2 combines with water and oxygen in the atmosphere to form acid rain, which raises the acid level of lakes and streams, is detrimental to crops and forests and accelerates the deterioration of buildings and monuments.

Additional Information:

This label provides information on the New England regional electric system power sources and the air emissions related to electricity generation. For additional information on Supplier prices, power sources and air emissions, visit the CT PURA's **Electric Supplier Info Database, www.dpuc.state.ct.us/el_aggre.nsf**

In the case of an emergency or power outage, please contact your utility. UI customers call: 1-800-7CALL UI (1-800-722-5584); and Eversource customers call 1-800-286-2000.

The Connecticut Public Utilities Regulatory Authority (PURA), Ten Franklin Square, New Britain, CT 06051
Toll-free 1-800-382-4586 www.ct.gov/pura

Suppliers are required to post their Disclosure Label(s), and updated versions as they occur, to the Electric Supplier Info Database on the PURA's website.

PURA Disclosure Label-Supplier-template-12-2012