



Shaina A. Rosenbleet, Esq.  
Two International Place  
6th Floor  
Boston, MA 02110  
617-342-6829  
srosenbleet@eckertseamans.com

*Via Electronic Filing*

April 2, 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, Tier II Initiatives**

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”) Tier Two Initiatives from docket D.P.U. 19-07. As you may recall, 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 in agreement with RESA’s comments.

Along with RESA, Starion supports the Department’s continued consideration of initiatives to improve the retail electric competitive supply market. Starion also strongly supports the initiative to allow customers to exercise the right to choose who provides their electric supply with information that they have readily available. Starion further agrees that the Department should modify Staff’s third-party verification (“TPV”) and license renewal proposals and agrees with RESA’s comments regarding both issues.

Starion would like to expand upon RESA’s comments concerning potential limitations on the products, and therefore prices, suppliers may be able to offer low-income and/or automatically renewed customers, including potentially capping rates at Basic Service. Starion believes that utilizing the Basic Service rate as the benchmark for low-income and automatically renewed customers is filled with errors that need to be addressed in a technical session. Setting any limitation on the available products at time of renewal will require extensive input by stakeholders. Consequently, Starion agrees that before adopting any proposal that would limit consumer product choice, and therefore the prices a supplier could charge, the Department should provide a technical session for stakeholder input on the implications of any such proposal.

Starion appreciates the opportunity to offer this support letter on the Tier Two Initiatives and looks forward to a technical session to work with the other stakeholders to further improve this process.

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

Sincerely,

/s/ Shaina A. Rosenbleet  
Shaina A. Rosenbleet