



December 7, 2020

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

Re: Request for Comments (Docket No. 19-07)

Dear Secretary Marini,

Eligo Energy MA, LLC is writing in response to a notice for public comments regarding Tier Two initiatives on November 19, 2020 (Docket No. 19-07).

Regarding initiative "Public Access to License Renewal Applications," we find acceptable the requirement of indicating whether or not we are licensed to serve residential customers. However, publicly identifying corporate structure details as part of a license renewal application may pose confidentiality concerns.

Regarding initiative "Door to Door Marketing Notification," specifically "Notification of Municipal Officials," we would like municipalities to provide a contact's name and email address for which a Supplier may send required notifications for door-to-door marketing. We would like to advocate for an exclusively electronic notification process, as it helps to eliminate waste, allows for a faster delivery time, and is better for the environment. The notification provided to municipalities by Suppliers should indicate the time period they will be conducting door-to-door marketing in the municipality territory, and a contact with a telephone and email address that the municipality can use should they have any questions or concerns for the Supplier. The Department should offer guidance to municipalities in the form of training materials or seminars. Such training should be developed with input from suppliers.

Regarding initiative "Door to Door Marketing Notification," specifically "Five-Municipality Limit," the Department should defer consideration of a five-municipality approach until such time that more information may be obtained on the effects of such limitations. The limit may involve changes for Suppliers that are onerous to implement. The Department should not require global positioning system/geo-tracking technology to track employee and vendor agent location. A collection and possible transmission of such data would create massive privacy and security concerns, posing an undue burden on Suppliers. Moreover, there may be employment, privacy and other constitutional concerns that should be considered prior to requiring door-to-door marketers to wear any geo-tracking technology.

Regarding initiative "Door to Door Marketing Notification," specifically "Springfield" and "Worcester", we believe that neighborhood door to door notifications should imitate the door-to-door notifications required for municipalities.



Regarding initiative "Contract Summary Form," specifically "Voluntary Renewable Energy Content," we believe that the Contract Summary Form is not the proper place to put where renewable energy resources are located or designated. It would make the contract summary form even longer and more convoluted for customers who may not understand how the renewable energy process works, thus defeating the purpose of a clear, easy to follow form. Instead, we recommend that this information be placed on an Environmental Disclosure label, applicable to all customers and located on the Supplier website. On the Contract Summary Form, a short sentence directing customers to such disclosure page could be presented.

Regarding initiative "Recording of Telemarketing Calls," we request the Department consider requiring Suppliers to provide sales recordings within five (5) business days or seven (7) calendar days as opposed to the proposed three (3) business day proposal. Suppliers often work with outside vendors and may require additional time to obtain sales recordings. Additionally, sometimes it is necessary to obtain additional information from Customers (e.g., their telephone number) to locate the sales call(s).

Regarding initiative "Display of Renewable Energy Products on Energy Switch," we support the Department proposal to eliminate the minimum renewable energy content requirement for NON-RPS CLASS I products. As stated above, we recommend an Environmental Disclosure Label provided by the Supplier in lieu of providing customer specific information.

Regarding initiative "Definition of Small Commercial and Industrial Consumer," we support the Department proposed definition and the aggregate strategy presented by Department.

Regarding initiative "Untimely License Renewal Applications," we support the Departments proposal regarding late Supplier and Broker license renewal applications.

We look forward to the Departments feedback regarding these Tier Two initiatives.

Thank you for your consideration of this comment.

Sincerely,

*/s/Alexander Rozenblat*

Alexander Rozenblat  
Chief Legal Officer  
Eligo Energy MA, LLC