

## Swain, Marian (ENE)

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**From:** Mike Ossing <atlarge\_3@marlborough-ma.gov>  
**Sent:** Wednesday, December 7, 2022 8:24 AM  
**To:** Swain, Marian (ENE)  
**Cc:** Mike Ossing  
**Subject:** Comments on DOER Municipal Aggregation Manual and Best Practices Guide

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Hello Marian

Thanks for the opportunity to comment on the Draft Municipal Aggregation Manual and Best Practices Guide. Below are comments for DOER's consideration:

General: Add an Appendix for acronyms. The terms EDC, EDCEDC, CLC, ESA would benefit from a complete listing for readers to refer to. What does EDCEDC stand for?

Section 3.3.2 – second paragraph – second line – The statement that out of region RECs “will not necessarily reduce emissions” is not a correct statement. A “REC” is a REC” and is a renewable energy credit that is not fossil fuel generated. This statement should be removed or clarified.

Section 3.2.3 – second paragraph – it is understandable that DOER recommends Mass Class 1 RECs, however, municipalities looking to enhance their “green” energy portfolio by purchasing “out of region” RECs because they are cost beneficial to their residents should be encouraged and recognized for the potential savings over Mass Class 1 RECs while saving consumers money on their electricity bill.

Section 3.3 – first paragraph on page 20 – It is not clear regarding the “adder to fund an Energy Manager.” The second sentence indicates communities collect an adder to fund an Energy Manager. The next sentence states the adder cannot be used to fund an Energy Manager. Which is correct? Please clarify. This also appears on the last paragraph on page 26.

Section 4.3.2 – second paragraph last line – is the term “Department” meant to refer to the DPU or DOER? Please clarify.

Section 4.4.3 – second paragraph – in the third line it states “(see next Section 4.4.2)”. Should this be Section 4.4.4?

Section 5.1 – second paragraph – DOER should emphasize that opting “In” or “Out” may take up to two month before rates are in effect based on when the meter read takes place and the call to opt “In” or “Out”. The statement that “Changes will typically be reflected on the next monthly billing cycle” needs more emphasis that it may take up to two billing cycles.

Section 5.4 – second paragraph – third line – the statement “... retired RECs, which that are evidence...” needs work. Suggest deleting either “which” or “that”.

Section 5.6 – third paragraph – what is the timeline to restart a program that has been terminated? Municipalities that entered an unfavorable ESA may find it economically beneficial for their residents to terminate the program.

Finally, I would offer a best practice regarding indicative pricing. Consider adding as part of Section 5.3 or a separate section:

- Indicative Pricing – Municipalities should engage their energy brokers to periodically obtain energy pricing. The volatility of the energy markets requires municipalities to continually monitor energy prices (every 3 months or when market conditions change significantly) to determine the potential to blend and extend their current contracts. This is critical when the current term of the contract is set to expire for municipality evaluation.

Michael Ossing  
Marlboro City Council President  
Chair Marlboro Municipal Aggregation Committee