



December 7, 2022

Marian Swain, Deputy Director of Policy & Planning  
Department of Energy Resources  
100 Cambridge Street, 9th Floor  
Boston, MA 02114

*Delivered Electronically*

Re: Municipal Aggregation Manual and Best Practices Guide

Dear Deputy Director Swain,

On behalf of the 351 cities and towns of the Commonwealth, the Massachusetts Municipal Association is writing to offer comments as the Department of Energy Resources evaluates the draft Municipal Aggregation Manual and Best Practices Guide.

Municipal aggregation has been an important local option for Massachusetts municipalities since 1997 and can provide many benefits to its customers, including higher renewable energy content, competitive pricing, and relative price stability. As the number of communities with active municipal aggregation programs continues to grow, we commend the Department of Energy Resources for creating this manual to help municipalities, residents, and their brokers better understand aggregation from formation to operation.

Our members who have pursued municipal aggregation are well aware of the many complexities involved in getting a program up and running; the structure and timeline provided by the manual will greatly assist communities looking to create a program from the ground up. The thorough review of the process with best practices highlighted throughout will be a boon to municipalities across the Commonwealth.

We would be remiss if we did not raise one issue of concern we identified in the draft. The manual includes several mentions of established language requirements of the Department of Public Utilities relating to outreach materials and communications. The draft, however, does not fully enumerate or specifically describe these requirements, and suggests municipal leaders consult with counsel and review the regulatory requirements of most recently approved plans.

Detailing these requirements and including a full catalog of them in the final Municipal Aggregation Manual and Best Practices Guide would be beneficial to municipalities and their partners. This is especially true if municipalities do not solicit a broker, an option mentioned throughout the guide. As municipalities work diligently to inform their residents of the program

and train their municipal staff on how to field questions related to municipal aggregation, a clear and explicit description of the communication requirements determined by the Department of Public Utilities (DPU) would be a welcome addition to the guide.

We greatly appreciate your collective efforts to make municipal aggregation more accessible and see this draft as a positive step forward. As we look toward a winter with rising electricity rates for basic service, municipal aggregation continues to be a top priority for our members. We commend the work of the Department of Energy Resources to better support the filing and review of municipal aggregation plans and we look forward to continuing to engage on this topic in the future.

Thank you for considering our comments outlined above. If you have any questions regarding our comments or require additional information, please do not hesitate to contact me or MMA Legislative Analyst Josie Ahlberg at [jahlberg@mma.org](mailto:jahlberg@mma.org) or 617-426-7272, ext. 161 at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Beckwith". The signature is stylized and cursive.

Geoffrey C. Beckwith  
Executive Director & CEO