

Swain, Marian (ENE)

From: Elisa Grammer <elisa.grammer@perennialmotion.com>
Sent: Wednesday, December 7, 2022 12:15 PM
To: Swain, Marian (ENE)
Subject: Comments on DOER's draft Municipal Aggregation Manual and Best Practices Guide
Attachments: 2022_11_02 Amesbury Muni Aggregation Delay.pdf; 2022_10_16 BostonGlobeThese communities want to lower residents' electric bills — and carbon emissions..pdf

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Marian Swain
Deputy Director of Policy & Planning
Department of Energy Resources

Dear Ms. Swain,

Please accept for filing the following comments on DOER's draft Municipal Aggregation Manual and Best Practices Guide. As a member of a town Energy and Sustainability Committee that is embarking on municipal aggregation, I commend DOER's work in providing this expanded and updated guidance, and offer the following comments on the draft.

As a general comment, the checklist and other information about plan options and selecting a consultant are enormously valuable.

It would, however, also be useful to prepare municipalities for the unusual process D.P.U. engages in when reviewing municipal aggregation plans. This has been shown to involve extremely lengthy and inexplicable delays, as reported in the attached recent *Newburyport Daily News* and *Boston Globe* articles. It also features a process in which the D.P.U. issues mandates in the form of discovery requests, as for instance in the case of Amesbury, D.P.U. 21-48 *available at*

<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/15090924>

These practices cannot be reconciled with Massachusetts' statutory requirements for such administrative procedures, including but not limited to MGL ch 30A, sec. 10.

Thus I respectfully request that the Guidelines disclose these D.P.U. practices and advise municipalities of any means to manage the D.P.U. process.

An addition comment:

p. 26

4.1.4 Evaluate Consultant Options

The following sentence:

“The Energy Manager does not need to paid for using an adder in order to assist with an aggregation.”

contains a typographical error and unclear phrasing.

A change to other wording would make this more readily understood:

In assisting with an aggregation, the Energy Manager need not be compensated through an operational adder.

Thank you for your consideration of these comments.

Respectfully submitted,

Elisa J. Grammer
47 Coffin Street
West Newbury, MA 01985

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Elisa J. Grammer

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