

January 22, 2024

BY ELECTRONIC MAIL

Mark J. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: Town of Boxford, D.P.U. 22-128 – Compliance Filing

Dear Secretary Marini:

The Town of Boxford (“Town”) hereby submits its revised municipal aggregation plan and associated documents in response to the Order dated December 22, 2023 issued by the Department of Public Utilities (“Department”) in the above-captioned proceeding (“Order”).

Included with this submission are clean and redlined versions of the noted documents compared to the Exhibit 1 versions submitted on November 10, 2023 in response to the Department’s First Set of Information Requests and the Exhibit 2 version submitted on October 5, 2022 with the Town’s initial filing:

- Key to Compliance Filing
- Exhibit 1 – Municipal Aggregation Plan (clean and redlined)
- Exhibit 1, Attachment A – Education and Outreach Plan (clean and redlined)
- Exhibit 2 – Exemplar Electric Service Agreement (“ESA”) (clean and redlined)

Additionally, as directed in the Order, at page 48 (bullet 1), the Town confirms that the enrollment and pricing procedures identified in the ESA are fully consistent with the enrollment and pricing procedures in the Plan and Education Plan.

If you have any questions, please do not hesitate to contact me at laura@lsoenergyadvisors.com or the number below.

If you wish to contact the Town of Boxford directly, please contact Matt Coogan, Town Administrator, at mcoogan@town.boxford.ma.us.

Thank you for your attention to this matter.

Very truly yours,



Laura S. Olton
Counsel for Good Energy, L.P.,
Consultant to the Town of Boxford

Enclosures

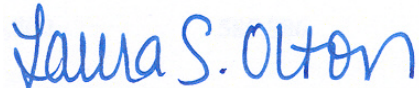
cc: Timothy Federico, Hearing Officer (by electronic mail)
Service List, D.P.U. 22-128 (by electronic mail)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

_____)	
Petition of the Town of Boxford for)	
Approval by the Department of Public)	D.P.U. 22-128
Utilities of a Municipal Aggregation Plan)	
pursuant to G.L. c. 164, § 134)	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties on the Department's service list by electronic mail.



Laura S. Olton, Esq.
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Dated: January 22, 2024

Key to Town of Boxford Compliance Filing, D.P.U. 22-128

Town of Boxford Aggregation Plan (“Plan”)				
Order page #	Summary Bullet¹	Requirement	Plan (redlined) page #	Note
14		If the Municipalities opt to provide a range of RECs, however, they must sufficiently: (1) explain their decision-making factors or criteria in evaluating bids and selecting the standard product; (2) identify the person responsible for exercising the discretion of determining the final renewable energy content; and (3) explain whether the level of renewable energy content in excess of the Massachusetts RPS and/or the type of RECs will vary after the establishment of the standard product.	4-5, 7	Notwithstanding Department approval on page 16 of the Order, the Municipality has clarified language regarding the products and decision-makers of renewable energy content.
28, 49	2	Each Municipality shall amend its Plan to indicate that such notice will contain the then-applicable basic service rate.	12-13, 19 See also Ed Plan at 6, 10.	Edits include language for Renewal Notices as well as notices for any change in Program price related to a change in law
45	3	Each Municipality shall amend its Plan and Education Plan to include the required revisions to its alternative disclosure strategy identified above.	10-11	

¹ The Conclusion of D.P.U. 22-109/22-128, at pages 48-49, contains 3 bullets to be addressed in the compliance filing. While unnumbered in the Order, the bullets have been numbered sequentially here for reference.

45, n.42		Each Municipality also shall include an appropriate reference in its Plan indicating where the alternative information disclosure strategy can be found.	10, n.4	
40-41		The exemplar ESAs appropriately recognize that each Municipality shall not enter into an ESA with a competitive supplier unless it is fully consistent with its Department-approved Plan and Department directives; a failure in this regard will result in termination of the Program. Each Municipality revised its proposed Plan to recognize this requirement (Exhs. Plans at IV.b.i.).	7	Cleaned up language in Plan notwithstanding Department approval on page 40-41.
34		First, with respect to the labeling of the Contract Summary Form, the Municipalities may label the form as a “Product Summary Form” as proposed, so long as it contains all required information pursuant to the Department’s directives in DPU 19-07-A...The Department will reserve final approval of the exemplar Contract Summary Forms until each Municipality submits final Opt-Out Documents (including Opt-Out Notices with actual prices and renewable energy content) for Department review prior to Program launch.	8	Cleaned up language in Plan regarding waiver for the Opt-Out Notice and Product Summary Form.

Education and Outreach Plan (“Ed Plan”)				
Order page #	Summary Bullet	Requirement	Ed Plan (redlined) page #	Note
45-46,	3	Each Municipality shall amend its Plan and Education	8-9	The specific quarterly

49		Plan to include the required revisions to its alternative disclosure strategy identified above. In addition, each Municipality shall amend its Education Plan to identify the specific schedule on which the quarterly notification will occur.		disclosure notification schedule was already included in the Education Plan on page 8, so it does need to be amended.
28, 49	2	Each Municipality shall amend its Plan to indicate that such notice will contain the then-applicable basic service rate.	6, 10 See also Plan at 12-13, 19	Edits include language for Renewal Notices as well as notices for any change in Program price related to a change in law.

ESA				
Order page #	Summary Bullet	Requirement	ESA (redlined) page #	Note
48	1	Each Municipality shall: (1) confirm that the enrollment and pricing procedures identified in its exemplar ESA are fully consistent with the enrollment and pricing procedures contained in the Municipality's Plan and Education Plan; and (2) make any necessary revisions to the exemplar ESA to conform it to the Municipality's Plan and Education Plan.	12, 13, 14, 15	Revisions made to conform to the Municipality's Plan and Education Plan.

Additional Notes:

- The Municipality has corrected various typos and formatting throughout, identified in redline.
- Footnote 29 provides, "The Department will reserve final approval of the exemplar renewal notifications until each Municipality submits final Opt-Out Documents (including Opt-Out Notices with actual prices and renewable energy content) for Department review prior to Program launch." Footnote 30 provides, "The Department will reserve final approval of these

proposed forms until each Municipality submits the final Contract Summary Forms with the final Opt-Out Documents for Department review.” Accordingly, the Municipality will provide final Opt-Out Documents, Contract Summary Forms and exemplar renewal notifications to the Department for final approval prior to Program launch.