



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

D.P.U. 19-41

September 30, 2019

Petition of the City of Worcester for approval by the Department of Public Utilities of a municipal aggregation plan pursuant to G.L. c. 164, § 134.

APPEARANCES:

Paul Gromer, Esq.
Paul Gromer, LLC
85 Merrimac Street, 3rd Floor
Boston, Massachusetts 02114
FOR: CITY OF WORCESTER
Petitioner

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I. INTRODUCTION AND PROCEDURAL HISTORY

On January 31, 2019, the City of Worcester (“City” or “Worcester”) filed with the Department of Public Utilities (“Department”) a petition for approval of a municipal aggregation plan pursuant to G.L. c. 164, § 134. On August 29, 2019, Worcester filed a revised plan (“Plan”).¹ Under the Plan, Worcester will establish a municipal aggregation program (“Program”) through which it will aggregate the load of electric customers located within its municipal borders in order to procure electric supply for Program participants. Eligible customers will be automatically enrolled in the Program unless they choose to opt out. G.L. c. 164, § 134(a). The Department docketed this matter as D.P.U. 19-41.

On April 2, 2019, the Department issued a Notice of Public Hearing and Request for Comments (“Notice”). The Department conducted a public hearing on May 6, 2019.² On that same date, comments were filed by the Attorney General of the Commonwealth (“Attorney General”) and Massachusetts Electric Company, d/b/a National Grid (“National Grid”).

At the joint request of the City and the Attorney General, the Department held a technical conference on July 30, 2019. On August 9, 2019, and August 14, 2019, Worcester filed responses to information requests issued by the Department and the Attorney General,

¹ All references to “Plan” herein are to the revised Plan and exhibits thereto filed on August 29, 2019.

² Pursuant to G.L. c. 164, § 134(a), the Department must hold a public hearing prior to approval of a municipal aggregation plan.

respectively.³ The Attorney General, National Grid, and Worcester filed initial comments on August 30, 2019. Worcester filed reply comments on September 9, 2019.

II. SUMMARY OF PROPOSED PLAN

Worcester states that the focus of its Plan is to “bring the benefits of electricity choice, cost stability and sustainable options to its residents and businesses” (Plan at 1). Worcester retained MassPowerChoice, LLC, (“MassPowerChoice”) as a municipal aggregation consultant to assist it in developing, implementing, and managing the Program (Plan at 4). Worcester and MassPowerChoice developed the Plan in consultation with the Department of Energy Resources (“DOER”) (Petition at 2, Exh. 3).

The Worcester City Manager will be responsible for all Program decisions, including the supervision of the aggregation consultant, selection of competitive supplier(s), execution of contracts, and termination of the Program (Plan at 3, 8). Under the Plan, Worcester will issue a request for proposals to solicit bids from competitive suppliers for firm, all-requirements electric power supply (Plan at 4-5; Petition, Exh. 2, at 4, 9). Prices, terms, and conditions for electric supply may differ among customer classes (Plan at 6). Worcester will launch the Program when it obtains bids that meet set criteria (Plan at 5).

Worcester intends to offer at least two electric power supply products through the Program (Plan at 1-2). The default product will include renewable energy certificates (“RECs”) in an amount greater than the minimum Massachusetts Renewable Portfolio Standard (“RPS”) requirements (Plan at 2). In addition, Worcester intends to offer at least one optional product

³ On its own motion, the Department moves into the record Worcester’s responses to Information Requests DPU 1-1 through DPU 1-39 and AG 1-1 through AG 1-2.

that includes a higher number of RECs than the default product (Plan at 2). Depending on cost, Worcester states that it may also integrate electricity generated by local resources into its power supply options (Plan at 2).

After executing a contract for electric supply, Worcester will notify eligible customers⁴ about Program initiation and customers' ability to opt out of the Program (Plan at 5-6; Petition, Exh. 2, at 11-14). The notification process will include newspaper notices, public service announcements, informational web pages, a toll-free customer support hotline, community presentations, and the posting of notices at City Hall (Plan at 5).

The notification process will also include a Department-approved opt-out notice to be sent to eligible customers on the City's behalf by the competitive supplier (Plan at 6). The competitive supplier will bear all expenses relating to the opt-out notice (Plan at 6; Petition, Exh. 2, at 11). Worcester will require the competitive supplier to include a return-addressed, postage-paid reply envelope with the opt-out notice so that consumers who sign the opt-out document can protect their signature from exposure (Plan at 6; Petition, Exh. 2, at 12). After enrollment, participants will have the right to opt out of the Program at any time and return to basic service at no charge (Plan at 1, 8, 10; Petition, Exh. 2, at 12).

⁴ Pursuant to Municipal Aggregation Programs, D.P.U. 16-10, at 19 (2017), the following are eligible customers: (1) basic service customers; (2) basic service customers who have informed the electric distribution company they do not want their contact information shared with competitive suppliers for marketing purposes; and (3) customers receiving basic service plus an optional green power product that allows concurrent enrollment in either basic service or competitive supply. The following are not eligible customers: (1) basic service customers who have asked the electric distribution company to not enroll them in competitive supply; (2) basic service customers enrolled in a green power product program that prohibits switching to a competitive supplier; and (3) customers receiving competitive supply. D.P.U. 16-10, at 19.

Program participants will receive one bill from the local electric distribution company (i.e., National Grid), which will include the Program's supply charge and National Grid's delivery charge (Plan at 7). Program participants will also pay a \$0.0009 per kilowatt-hour ("kWh") administrative adder that will be used to compensate MassPowerChoice for the development and implementation of the Program, including its provision of ongoing services including: (1) managing the electrical supply and renewable energy procurement; (2) implementing the public education plan; (3) providing customer support; (4) interacting with National Grid; (5) monitoring the supply contract; and (6) providing ongoing reports to DOER and the Department (Plan at 7; Petition, Exh. 2, at 38).

In addition to the administrative adder, the City proposes to collect an operational adder of up to \$0.0025 per kWh⁵ (Plan at 7; Exhs. DPU 1-7; DPU 1-8). The City states that the operational adder will be used to support the following activities that provide benefits to Program participants: (1) personnel costs associated with a Sustainability Program Manager⁶ to assist with Program implementation; (2) additional REC purchases and related obligations; and (3) other forms of support for local energy projects (Plan at 7; Exhs. DPU 1-7; DPU 1-8). In addition, Worcester initially proposed to fund certain unspecified energy efficiency activities through the operational adder to supplement the existing MassSave program administered by

⁵ Worcester will determine the amount of the operational adder based on its review of bids for power supply and RECs (Exh. DPU 1-8(a), (b)).

⁶ Worcester's current Sustainability Program Manager will perform these duties (Exh. DPU 1-7).

National Grid (Petition, Exh. 1, at 3). Worcester subsequently amended its Plan to remove all references to proposed energy efficiency initiatives⁷ (Exhs. DPU 1-8; DPU 1-24; DPU 1-36).

Worcester requests a waiver, on its behalf and on behalf of its competitive supplier, from the information disclosure requirements contained at 220 CMR 11.06, which oblige competitive suppliers to mail information disclosure labels directly to customers on a quarterly basis (Petition at 2).⁸ As good cause for the waiver, Worcester states that it can provide this information as effectively and at a lower cost using means other than those specified in the Department's regulations, including press releases and postings on the Program's website (Petition at 2; Plan at 6).

III. SUMMARY OF COMMENTS

A. City of Worcester

The City maintains that its Plan complies with all procedural and statutory requirements of G.L. c. 164, § 134(a) and is fully consistent with Department precedent (Worcester Initial Comments at 1). Further, Worcester asserts that its "robust" education plan will ensure that residents are fully informed about the Plan and the right to opt-out (Worcester Initial Comments at 6).

Worcester opposes the Attorney General's recommendation that the Department require the City to launch its Program by a fixed date (Worcester Reply Comments at 1). Worcester

⁷ Worcester states that it will no longer allocate any operational adder funds to proposed energy efficiency initiatives (Exh. DPU 1-8(d)). The City did not, however, propose any reduction to the maximum operational adder to reflect this change (see Plan at 7).

⁸ The disclosure label provides information regarding a competitive supplier's fuel sources, emission characteristics, and labor characteristics. 220 CMR 11.06.

argues that the Attorney General failed to provide any evidence of the magnitude of the “significant risk premium” she alleges will negatively affect basic service pricing in the absence of a fixed Program launch date (Worcester Reply Comments at 1-2, citing Attorney General Initial Comments at 1-2). In addition, the City asserts that there is no legal basis in G.L. c. 164, § 134 for the Department to adopt the Attorney General’s proposal (Worcester Reply Comments at 2, citing City of Lowell, D.P.U. 12-124 (2013)). Finally, Worcester maintains that, under the Attorney General’s recommendation, the City would be forced to accept a competitive supply bid, regardless of whether the price or the terms and conditions were acceptable (Worcester Reply Comments at 4).

The City also opposes National Grid’s recommendation that Worcester include language in the opt-out notice regarding a one-time reconciliation charge for certain commercial and industrial (“C&I”) customers (i.e., G-2 and G-3 basic service customers on the fixed price option) (Worcester Reply Comments at 3-5, citing Exh. DPU 1-37). Worcester argues that adding such language is unnecessary because the reconciliation charge would apply only to eleven out of approximately 60,000 eligible customers (Worcester Reply Comments at 5). Further, the City argues that adding such language could cause customer confusion by adding text to an already dense opt-out notice (Worcester Reply Comments at 5).

B. Attorney General

The Attorney General does not oppose Department approval of Worcester’s Plan and supports the City’s efforts to provide residents with greener electricity supply options through the Program (Attorney General Initial Comments at 1). However, the Attorney General expresses concern regarding the uncertainty of the Program launch date and its potential negative

effect on basic service customers in National Grid's service territory (Attorney General Initial Comments at 1). In particular, the Attorney General asserts that eligible customers in Worcester represent a significant portion of National Grid's basic service load (Attorney General Initial Comments at 2, citing Exhs. DPU 1-26; DPU 1-27). The Attorney General argues that suppliers could add significant premiums to their basic service bids to account for the risk of a large change in the size of the load, resulting in higher rates for National Grid's basic service customers (Attorney General Comments at 2). To eliminate this risk, the Attorney General argues that the Department should require Worcester to launch its Program by a date certain (Attorney General Comments at 2). The Attorney General argues that the Department has the authority to implement this recommendation because it similarly restricted the practice of municipalities suspending their aggregation to obtain lower rates in D.P.U. 12-124 (Attorney General Initial Comments at 3-4, citing, D.P.U. 12-124, at 65-66).

C. National Grid

National Grid argues that the Department should require Worcester to amend its opt-out notice to include mention of the possibility of a reconciliation charge for C&I customers leaving basic service (National Grid May 6, 2019 Comments at 1; National Grid Initial Comments at 1). National Grid argues that the City's proposal to disclose the reconciliation charge only on the Program website is insufficient as not all customers will visit the website and, instead, may rely solely on the opt-out notice for Program information (National Grid Initial Comments at 1, citing Exh. DPU 1-37). Moreover, National Grid notes that the reconciliation charge at issue appears on several Department-approved opt-out notification forms (National Grid Initial Comments at 1; citing Town of Harvard, D.P.U. 18-97 (2019); City of Marlborough, D.P.U. 17-47 (2018)).

IV. STANDARD OF REVIEW

General Laws c. 164, § 134(a) authorizes any municipality or group of municipalities to aggregate the electrical load of interested customers within its boundaries, provided that the load is not served by a municipal light plant. Upon approval by the local governing entity or entities, a municipality or group of municipalities may develop a municipal aggregation plan, in consultation with DOER and for review by its citizens, providing detailed information to customers on the process and consequences of aggregation. G.L. c. 164, § 134(a). A municipal aggregation plan must provide for universal access, reliability, and equitable treatment of all classes of customers and meet any requirements established by law concerning aggregated service. G.L. c. 164, § 134(a).

A plan must include the following: (1) the organizational structure of the program, its operations, and its funding; (2) details on rate setting and other costs to its participants; (3) the method of entering and terminating agreements with other entities; (4) the rights and responsibilities of program participants; and (5) the procedure for termination of the program. G.L. c. 164, § 134(a). Municipal aggregation plans must be submitted to the Department for review and approval. G.L. c. 164, § 134(a).

Participation in a municipal aggregation plan is voluntary and a retail electric customer has the right to opt out of plan participation. G.L. c. 164, § 134(a). Municipalities must inform eligible customers of (1) automatic plan enrollment and the right to opt out, and (2) other pertinent information about the plan. G.L. c. 164, § 134(a); Municipal Aggregation Programs, D.P.U. 16-10, at 19 (2017).

The Department's review will ensure that the plan meets the requirements of G.L. c. 164, § 134, and any other statutory requirements concerning aggregated service. In addition, the Department will determine whether a plan is consistent with provisions in the Department's regulations that apply to competitive suppliers and electricity brokers. See 220 CMR 11.00. Although the Department's regulations exempt municipal aggregators from certain provisions contained therein, the regulations provide no such exemption for the competitive suppliers that are selected to serve a municipal aggregation load. See 220 CMR 11.00.

A municipal aggregator is exempt from two requirements included in the Department's regulations concerning competitive supply. First, a municipal aggregator is not required to obtain a license as an electricity broker from the Department under 220 CMR 11.05(2) in order to proceed with an aggregation plan. City of Marlborough, D.T.E. 06-102, at 16 (2007). Second, a municipal aggregator is not required to obtain customer authorization to enroll customers in the program pursuant to G.L. c. 164, § 1F(8)(a) and 220 CMR 11.05(4). D.T.E. 06-102, at 16. The opt-out provision applicable to municipal aggregators replaces the authorization requirements included in the Department's regulations. D.T.E. 06-102, at 16.

A competitive supplier chosen by a municipal aggregator is not exempt from other applicable Department regulations. D.T.E. 06-102, at 16. To the extent that a municipal aggregation plan includes provisions that are not consistent with Department regulations, the Department will review these provisions on a case-by-case basis. D.T.E. 06-102, at 16.

V. ANALYSIS AND FINDINGS

A. Consistency with G.L. c. 164, § 134

1. Procedural Requirements

General Laws c. 164, § 134(a) establishes several procedural requirements for a municipal aggregation plan. First, a municipality must obtain authorization from certain local governing entities prior to initiating the process to develop an aggregation plan.

G.L. c. 164, § 134(a).⁹ Worcester provided a certificate from the City Clerk demonstrating an affirmative vote of its City Council with the approval of the Mayor prior to initiating the process of aggregation (Plan at 3, Exh. A). Therefore, the Department concludes that Worcester has satisfied the requirement regarding local governmental approval.

Second, a municipality must consult with DOER in developing its municipal aggregation plan. G.L. c. 164, § 134(a). Worcester provided a letter from DOER, dated March 14, 2019, confirming that the City completed this consultation (Petition at Exh. 3). Therefore, the Department concludes that Worcester has satisfied the requirement to consult with DOER.

Third, a municipality, after development of a plan in consultation with DOER, must allow for citizen review of the plan. G.L. c. 164, § 134(a). General Laws c. 164, § 134(a) is silent on the process a municipality must use to satisfy citizen review of a municipal aggregation plan. The Department, however, requires municipalities to allow citizens sufficient opportunity to provide comments on a proposed plan prior to the municipality filing its plan with the

⁹ A town may initiate a process to aggregate electrical load upon authorization by a majority vote of town meeting or town council. A city may initiate a process to authorize aggregation by a majority vote of the city council, with the approval of the mayor or, where applicable, the city manager. G.L. c. 164, § 134(a).

Department. Cape Light Compact, D.P.U. 14-69, at 42 (2015); Town of Ashby, D.P.U. 12-94, at 27 (2014).

Worcester made the Plan available on the Program website starting January 18, 2019, through the present¹⁰ (Exh. DPU 1-3). In addition, Worcester provided documentation that shows municipal officials presented the Plan at a public meeting on February 20, 2019 (Plan at Exh. A). Therefore, the Department concludes that Worcester has satisfied the requirement regarding citizen review.

Finally, a municipal aggregation plan filed with the Department shall include the following: (1) the organizational structure of the program, its operations, and its funding; (2) details on rate setting and other costs to its participants; (3) the method of entering and terminating agreements with other entities; (4) the rights and responsibilities of program participants; and (5) the procedure for terminating the program. G.L. c. 164, § 134(a). After review, the Department finds that the Plan includes each of these required components (Plan, at 4-9; Exh. DPU 1-24).

2. Substantive Requirements

a. Introduction

Municipal aggregation plans must provide for universal access, reliability, and equitable treatment of all classes of customers. G.L. c. 164, § 134(a). In addition, municipalities must inform all eligible customers prior to their enrollment of their right to opt out of the program and

¹⁰ The Program website is directly accessible from the Energy & Asset Management page of the City's website (Exh. DPU 1-3).

disclose other pertinent information regarding the municipal aggregation plan.¹¹ G.L. c. 164, § 134(a). D.P.U. 16-10, at 19.

b. Universal Access

The Department has found that the universal access requirement is satisfied when a municipal aggregation program is available to all customers within the municipality. D.P.U. 12-124, at 44-46; D.T.E. 06-102, at 19; Cape Light Compact, D.T.E. 00-47, at 24 (2000). Under the Plan, all eligible customers in Worcester will be enrolled in the Program unless they affirmatively opt out (Plan at 6, 9; Petition, Exh. 2, at 9). Consistent with Town of Lexington, D.P.U. 16-152, at 17 (2017), new eligible customers moving into Worcester will (1) initially be placed on basic service and (2) subsequently receive a notice informing them that they will be automatically enrolled in the Program unless they opt out (Plan at 7). Finally, pursuant to G.L. c. 164, § 134(a), the Plan provides that Program participants may return to basic service at any time after enrollment (Plan at 1, 8). After review, the Department concludes that Worcester has satisfied the requirements regarding universal access.

c. Reliability

A municipal aggregation plan must provide for reliability. G.L. c. 164, § 134(a). The contract that Worcester will enter into with the competitive supplier will contain provisions that commit the competitive supplier to provide all-requirements power supply, make all necessary arrangements for power supply, and use proper standards for management and operations (Plan

¹¹ The municipal disclosures must (1) prominently identify all rates and charges under the municipal aggregation plan, (2) provide the basic service rate, (3) describe how to access the basic service rate, and (4) disclose that a customer may choose the basic service rate without penalty. G.L. c. 164, § 134(a).

at 10). In addition, Worcester will use the services of MassPowerChoice, a licensed electricity broker, to ensure that the City has the technical expertise necessary to operate the Program (Plan at 4). After review, the Department concludes that Worcester has satisfied the requirements regarding reliability. See D.P.U. 14-69, at 45; Town of Natick, D.P.U. 13-131, at 20 (2014); D.P.U. 12-124, at 46.

The Department's findings above regarding reliability are premised on the City's use of a licensed electricity broker with the technical expertise necessary to operate the Program. The City's current contract for municipal aggregation consulting services expires in five years, with two, two-year options to renew (Exh. DPU 1-39). Prior to the expiration of its contract with MassPowerChoice, the City states that it will issue a request for proposals if it intends to continue to use the services of an aggregation consultant (Exh. DPU 1-39).

If Worcester engages the services of a different municipal aggregation consultant that is also a licensed electricity broker in Massachusetts, the City shall notify the Department in writing in advance of such change.¹² Alternately, in the event that the City intends to (1) forgo the services of a municipal aggregation consultant or (2) engage the services of a consultant that

¹² Such notice shall identify any new municipal aggregation consultant and describe the consultant's technical expertise to operate the Program. In addition, to the extent there has been a change in legal representation, the notice shall identify new counsel who will represent the City in connection with the Program (either directly or as counsel for the consultant in its role as agent for the City). Massachusetts Electric Company and Nantucket Electric Company, D.P.U. 18-118, Hearing Officer Memorandum at 2 (November 5, 2018), citing Massachusetts Electric Company and Nantucket Electric Company, D.P.U. 16-05, Hearing Officer Ruling on Petition to Intervene at 10 n.3 (March 25, 2016); Western Massachusetts Electric Company, D.T.E. 01-36/02-20, Interlocutory Order on Appeal of Hearing Officer Ruling Denying Petition to Intervene at 8-10 (January 31, 2003); 1975 Mass. Op. Att'y Gen. 136.

is not a licensed electricity broker in Massachusetts, Worcester will be required to demonstrate that, after such change, it will continue to have the technical expertise necessary to operate the Program.¹³

d. Equitable Treatment of All Customer Classes

A municipal aggregation plan must provide for equitable treatment of all customer classes. G.L. c. 164, § 134(a). Equitable treatment of all customer classes does not mean that all customer classes must be treated equally; rather, customer classes that are similarly situated must be treated equitably. D.P.U. 14-69, at 10-16, 45-47; D.T.E. 06-102, at 20.

Here, the Plan allows for varied pricing, terms, and conditions for different customer classes (Plan at 7, 10).¹⁴ This feature of the Plan's design appropriately takes into account the different characteristics of each customer class. D.P.U. 13-131, at 22-25; D.P.U. 12-94, at 32; D.P.U. 12-124, at 47. After review, the Department finds that Worcester has satisfied the requirements of G.L. c. 164, § 134(a) regarding equitable treatment of all customer classes.

e. Customer Education

i. Introduction

General Laws c. 164, § 134(a) provides that it is the duty of the aggregated entity to fully inform eligible customers that they will be automatically enrolled in the Program and that they

¹³ In such circumstance, the City will not be required to file an amended Plan. Instead, prior to any change in Program operations, Worcester will be required file a written Plan supplement for Department review and approval. Such filing shall be supported by testimony and exhibits designed to show that the City will continue to have the technical expertise to operate the Program after any change in operations. Failure to make this required showing will result in termination of the Program.

¹⁴ The Program will employ National Grid's customer classes (Plan at 10).

have the right to opt out. It is critical that a municipality inform and educate customers, including customers with limited English language proficiency, about a municipal aggregation plan and their right to opt out of the program, especially in light of the automatic enrollment provisions afforded to these plans. D.T.E. 06-102, at 21; City of Newton, D.P.U. 18-36, at 10 (2018). To this end, the Department reviews the form and content of the consumer notifications issued by municipal aggregations. As the Department continues to gain experience with the operation of municipal aggregation programs, it is fully anticipated that we will refine our position on the adequacy and clarity of consumer notifications. Town of Stoughton, D.P.U. 17-43, at 13 (2017). Worcester is required to adhere to any future directives in this regard. D.P.U. 17-43, at 13.

ii. Outreach Strategy and Language Access

Worcester acknowledges the importance of ensuring that all members of the City's population have meaningful access to Program information (Exh. DPU 1-21, Att. at 1). Accordingly, the City developed a detailed "Education and Outreach Strategy" in order to inform and educate eligible customers about the Program (Exh. DPU 1-21, Att.).

The City identified the specific materials and channels it will employ in each stage of its Education and Outreach Strategy (Exh. DPU 1-21, Att.). The materials and channels include the following: (1) a website containing specific details about the Program, frequently asked questions, and customer support services; (2) social media updates via Facebook, Instagram, and/or Twitter; (3) a press release at launch to local news outlets, City email lists, social media, City Hall bulletin boards, the City website, and the local public access television channel;

(4) outreach to community-based organizations¹⁵ with pricing and launch information; (5) two community-wide public education sessions; (6) a launch video for broadcast on local television channels and social media; (7) a “coming soon” postcard mailed by the supplier to eligible basic service customers¹⁶; and (8) a direct mail opt-out notice, which will inform eligible customers of their rights under the Program, including the right to opt out at any time without penalty (Exh. DPU 1-21, Att.).

In order to ensure that all customers are fully informed about automatic enrollment in a municipal aggregation plan and the right to opt out, the Department recently has required municipalities to include a sentence in the native language(s) of residents with limited English proficiency, in a prominent location and color at the top of the opt-out notice, to inform recipients that the notice contains important information from the municipality about their electric service and the customers should have the notice translated.¹⁷ See e.g., Town of Grafton, D.P.U. 18-61, at 9 (2019). Using data from the U.S. Census Bureau’s 2015 American Community Survey (“American Community Survey”), Worcester identified the following as the

¹⁵ Worcester’s Education and Outreach Strategy identifies 27 specific community-based organizations including faith-based communities, ESOL organizations, affordable housing organizations, and groups supporting veterans and seniors (Exh. DPU 1-21, Att. at 1-2).

¹⁶ Worcester shall amend its Education and Outreach Strategy to reflect the fact that all mailings and communications will be sent to “eligible customers” as defined correctly in the Plan at 9 per D.P.U. 16-10, at 19, and not “basic service customers” as the language currently reads (Exh. DPU 1-21, Att. at 3).

¹⁷ Such text also includes the toll-free customer service telephone number for the municipal aggregation program. D.P.U. 18-61, at 9.

primary languages spoken by its residents who speak English “less than very well”: (1) Spanish; (2) Vietnamese; (3) African languages, (4) Portuguese; (5) other Indo European languages; and (6) Chinese (Exh. DPU 1-16). The City proposes to add a sentence at the top of the opt-out notice to be mailed to eligible customers and make the entire opt-out notice available upon request in Spanish, Vietnamese, Portuguese, and Chinese¹⁸ (Plan at 5-6; Exhs. DPU 1-16; DPU 1-19). However, the City maintains that because the American Community Survey does not specify the languages encompassed by “African languages” and “other Indo European languages,” it is not feasible to add text to the mailed opt-out notice or otherwise make the opt-out notice available in these languages (Exh. DPU 1-16). Nonetheless, Worcester states that on-demand machine translation of the opt-out notice will be available on the Program website starting at Program launch (Exh. DPU 1-19). Finally, Worcester states customers who are deaf, hard-of-hearing, or visually impaired can request customer support services at public information events (Exh. DPU 1-18).

Participation in a municipal aggregation program is voluntary. G.L. c. 164, § 134(a). As noted above, G.L. c. 164, § 134(a) establishes a statutory duty for the municipality to “fully inform” customers about automatic enrollment and the right to opt out of a municipal aggregation program. It cannot be left to a municipality’s judgment as to whether this statutory mandate has been fulfilled. Instead, the Department finds that municipalities must fully address in their plans how they will provide adequate notice and education to customers with limited English proficiency. In addition, municipalities must address how they will provide adequate

¹⁸ More specifically, Worcester intends to make a translated version of the opt-out notice available in these languages on the Program website and at City Hall (Exh. DPU 1-19).

notice and education to customers with impaired physical capabilities who require visual or audial assistance. The Department appreciates the detailed Education and Outreach Strategy prepared by the City in this case. With certain changes described below, the Department finds that Worcester has fully addressed how it will meet its statutory duty to fully inform all eligible customers—including customers with limited English proficiency and customers who require visual or audial assistance—about automatic enrollment and the right to opt out of the Program.

The opt-out notice is a critical element of municipal aggregation education and outreach, and it must be designed to ensure that all eligible customers are clearly and fully informed about the Plan and their rights and obligations under the Program. As noted above, Worcester was able to identify some, but not all, of the primary languages spoken by its residents who speak English “less than very well” (Exh. DPU 1-16). In order to ensure that the opt-out notice is meaningful to all customers with limited English proficiency and other language access needs and to ensure that essential Program information is not compressed or omitted in order to accommodate adequate notice to such customers, the Department will require municipalities to include a separate Language Access Document with their opt-out notices.

The required Language Access Document will translate the following text into 26 languages that, according to U.S. Census Bureau data, are the languages spoken by limited-English-speaking Massachusetts residents:¹⁹

¹⁹ The English-language opt-out notice plus the text translated into 26 languages in the Language Access Document will reach more than 99 percent of the total population in Massachusetts. See 2013-2017 American Community Survey 5-Year Estimates, Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over (Table B16001) for Massachusetts, available at: <https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t> (enter

Important notice enclosed from [Municipality] about your electricity service. Translate the notice immediately. Call the number or visit the website, above, for help.

The Language Access Document will also provide instructions regarding how customers can receive visual or audial assistance with Plan information. A model Language Access Document is provided in Appendix A to this Order. Worcester shall revise its opt-out notice to include a proposed Language Access Document in compliance with these directives.²⁰

The required Language Access Document is designed to be universally employed in all municipal aggregation programs in Massachusetts and supersedes the earlier directives in D.P.U. 18-61 requiring municipalities to include a translated sentence at the top of the opt-out notice in the native language(s) of residents with limited English proficiency. The Department may, however, modify the language access requirements for individual municipal aggregation programs on a case-by-case basis where we find additional notice or education is warranted. In this regard, Worcester shall implement all remaining language-related elements of its Education and Outreach Strategy, including provision of the opt-out notice in Spanish, Vietnamese, Portuguese, and Chinese (Exh. DPU 1-21, Att.).

“B16001” and “Massachusetts” in the appropriate Advanced Search fields and select the first search result listed) (last visited September 30, 2019). Of the population that speaks a language other than English, the Language Access Document will reach more than 97 percent.

²⁰ The model Language Access Document has been prepared using the best machine translation information available to the Department. Worcester shall verify the translations in its proposed Language Access Document and, where necessary, provide a redline document showing any proposed changes to the model.

Finally, while G.L. c. 164, § 134(a) is silent regarding customer education after a customer is enrolled in a municipal aggregation program, Worcester must continue to provide customers with information regarding the ongoing operations of the Program. D.P.U. 14-69, at 48; Town of Dalton, D.P.U. 13-136, at 23 (2014). Here, the City's Plan provides that ongoing education will continue through a dedicated Program website linked to Worcester's website, including information regarding Program details, changes, and power supply sources (Plan at 5).²¹ In addition, the Plan provides that price changes will be announced in a media release, a on a posted notice at City Hall, and through the Program website (Plan at 7). Worcester will also maintain a toll-free customer information and support hotline for the duration of the Program²² (Plan at 5; Exh. DPU 1-17).

iii. Timing of Program Enrollment

In Town of Orange, D.P.U. 17-14, at 11-12 (2017), the Department determined that Program enrollments shall begin no sooner than 36 days after mailing of the opt-out notice. Such timing ensures that eligible customers have a full 30 days to opt out, plus an additional six days to account for mailing (i.e., three days for the opt-out notice to be delivered to the customer and three days for the opt-out document to be delivered to the competitive supplier through the mail). D.P.U. 17-14, at 12. The Department finds that the Plan is consistent with

²¹ Worcester shall provide, at a minimum, basic information about the Plan in a prominent location on its website with appropriate links to the dedicated Program website.

²² The toll-free number for customer questions includes on-demand interpreting in more than 200 languages (Exh. DPU 1-17).

these directives (Plan at 6; Exh. DPU 1-22, Att. at 11). The City and its consultant must ensure that the competitive supplier adheres to these directives.

To ensure that no customers who wish to opt out are automatically enrolled in the Program, the Department has determined that a municipal aggregator must identify the actual date by which customers must postmark the opt-out document, consistent with the timing described above. D.P.U. 17-14, at 12. The Department has further found that such language must appear in a prominent location and color at the top of the first page of the opt-out notice, as well as on the opt-out reply card, and it must inform eligible customers that they will be automatically enrolled in the Program, unless they return postmark the opt-out document by the identified date.^{23,24} D.P.U. 17-14, at 12. Worcester's exemplar opt-out notice and opt-out reply card are consistent with these directives, including a requirement that such notices be sent in clearly marked municipal envelopes that state they contain information regarding customers' participation in the Program and include a return-addressed, postage-paid reply envelope to protect consumer signatures from exposure (Plan at 6; DPU 1-22, Att. at 11).

²³ The Department has found that, where the opt-out notice and reply card will be printed entirely in black and white, a municipality may include the language in bold black type in the specified locations instead of in color. However, if the opt-out notice and reply card include any color text, this language must be included in color. Town of Shirley, D.P.U. 17-21, at 12 n.11 (2017), citing D.P.U. 17-14, at 12.

²⁴ The Department has determined that it is not optimal to group essential language regarding automatic enrollment and the deadline to act together with other information in the body of the opt-out notice. D.P.U. 17-14, at 12.

iv. Identification of Program Charges

Pursuant to G.L. c. 164, § 134(a), the City must prominently identify all Program charges and include a full disclosure of the basic service rate. In this regard, Worcester's exemplar opt-out notice prominently identifies all Program charges, including the \$0.0009 per kWh administrative adder that will be used to compensate MassPowerChoice and the yet-to-be-determined operational adder to support certain identified activities that provide benefits to Program participants (Plan at 7).

As described in Section II, above, the City initially proposed to charge an operational adder of up to \$0.0025 per kWh to fund various activities including energy efficiency initiatives (Plan at 7; Exhs. DPU 1-7; DPU 1-8). The City subsequently removed all proposed energy efficiency initiatives from its Plan but did not propose a corresponding decrease in the maximum operational adder to reflect the removal of these initiatives (Plan at 7; Exhs. DPU 1-7; DPU 1-8). Consistent with maximum operational adders approved for other municipal aggregation programs, the Department finds that the City may implement an operational adder of up to \$0.001 per kWh.²⁵ See e.g., D.P.U. 18-61, at 10; Town of Nantucket, D.P.U. 16-92, at 3 & n.4 (2016). The City shall revise its Plan to incorporate the revised maximum operational adder.

National Grid argues that Worcester's exemplar opt-out notice is deficient because it fails to disclose a reconciliation charge (or credit) applicable to certain C&I customers (National Grid May 6, 2019 Comments at 2; National Grid Initial Comments at 1-2). The City disagrees and

²⁵ Upon a future demonstration that a higher operational adder is necessary to fund identified initiatives that provide benefit to Program participants, the City may seek to revise its maximum operational adder.

argues that the disclosure requested by National Grid is unnecessary given (1) the finite space on the opt-out notice and the small number of customers the charge would apply to (i.e., eleven G-2 and G-3 customers on fixed price basic service) and (2) the possibility that such disclosure could cause customer confusion (Worcester Reply Comments at 4-5; Exh. DPU 1-37). Instead, Worcester proposes to disclose this reconciliation charge on the Program website (Exh. DPU 1-37).

The Department previously has approved disclosure on the opt-out notice of the reconciliation charge at issue here. See, e.g., Town of Harvard, D.P.U. 18-97, Stamp Approval of Compliance Filing at 11 (August 8, 2019); City of Marlborough, D.P.U. 17-47, Stamp Approval of Compliance Filing at 55 (February 6, 2018). As discussed above, pursuant to G.L. c. 164, § 134(a), the City must ensure that eligible customers are fully informed about the Plan, including a prominent identification of all Program charges. Even as here, where the charge only is applicable to a small number of eligible customers, the Department finds that the City's proposal to disclose the reconciliation charge on the Program website in lieu of the opt-out notice is insufficient. Instead, Worcester shall amend its exemplar opt-out notice to include language identifying the reconciliation charge or credit applicable to G-2 and G-3 customers on fixed price basic service.²⁶

After review, the Department finds that the Plan describes how Program charges will be set, including notice of additional costs that could be imposed due to a change in law (Plan at 7;

²⁶ The Department will not require the City to adopt the precise language proposed by National Grid (see National Grid Initial Comments at 1). The City may instead propose alternate compliance language designed to minimize customer confusion.

Exh. DPU 1-22, Att. at 27).²⁷ Furthermore, the Plan appropriately discloses (1) that taxes will be billed as part of the Program's power supply charge and (2) that customers are responsible for identifying and requesting an exemption from the collection of any tax by providing appropriate documentation to the competitive supplier (Plan at 7-8, Exh. B).

v. Cost Savings Disclaimer

Certain municipal aggregations may seek competitive supply rates that provide savings for participating customers compared to basic service rates. However, due to changes in market conditions and differences in contract terms, a municipal aggregation plan cannot guarantee customers cost savings compared to basic service over time. See D.P.U. 12-124, at 57-66. In addition, municipalities must fully inform customers about the plan, including the benefits and consequences of municipal aggregation. G.L. c. 164, § 134(a). This is true regardless of whether the primary purpose of the municipal aggregation is to provide savings to participating customers. D.P.U. 18-36, at 12. Therefore, the Department has found that municipalities must

²⁷ Should a change in law result in a material increase in costs to the competitive supplier, the Plan provides that Worcester and the competitive supplier will negotiate a potential change in the Program price. At least 30 days prior to the implementation of any such change, the City will notify Program participants of the change in price through media releases, postings at City Hall, and on the Program website (Plan at 7). The Department may require additional notification to consumers in the event that any such change causes the Program price to be above the applicable basic service price.

Worcester shall inform the Director of the Department's Consumer Division prior to the implementation of any such price change. Notification to the Department shall occur prior to the consumer notification and must include copies of all media releases, City Hall and website postings, and other communications Worcester intends to provide to customers regarding the change in price. City of Melrose, D.P.U. 18-59 (2019).

clearly explain, in a plan and all education materials, that customers are not guaranteed cost savings compared to basic service. City of Gloucester, D.P.U. 16-101, at 12-13 (2017).

The Plan and education materials include language related to “cost stability” and “competitive prices” while also appropriately disclosing that savings cannot be guaranteed (Plan at 2; Exhs. DPU 1-13; DPU 1-28). The City and its consultant shall ensure that all future communications and information regarding the Program (including, but not limited to, mailings, advertisements, website postings, and presentations to consumers) also contain a disclaimer that “savings cannot be guaranteed” in each instance where price is referenced, regardless of whether references to “savings,” “best possible price,” “cost stability,” or the like are made.

Conversely, certain information provided by MassPowerChoice to the City in response to the request for proposals for municipal aggregation consulting services included language related to “cost stability” and “cost reductions” without an accompanying disclaimer that savings cannot be guaranteed²⁸ (Exh. DPU 1-28, Att. at 6-7, 11). In Town of Hadley, D.P.U. 17-173, at 13-14 & nn.12, 13 (2018), the Department determined that any representations regarding savings made in conjunction with a consultant’s presentations to a municipality must also contain a disclaimer that such savings cannot be guaranteed. The Department notes that the materials at issue here are dated March 7, 2018, or approximately six months prior to the issuance of D.P.U. 17-173. Nonetheless, the Department finds that our earlier directives in D.P.U. 16-101, at 12-13, regarding the need for municipalities to clearly explain that customers are not guaranteed

²⁸ The Department notes positively that MassPowerChoice maintains throughout its marketing materials that it takes an “education, not sales approach” to all municipal aggregation communications (e.g., Exh. DPU 1-28, Att. at 1-2, 4).

savings, should have been instructive to MassPowerChoice as it prepared its response to the request for proposals for consulting services here.

The Department reaffirms its earlier findings that all communications, materials, and information (including, without limitation, mailings, advertisements, website postings, responses to requests for proposals, presentations, program documentation, educational information, and exemplar program documents) that an aggregation consultant provides to a municipality at any time, must contain a disclaimer that “savings cannot be guaranteed” in each instance where price or savings is referenced. See D.P.U. 17-173, at 13-14 & nn.12, 13; D.P.U. 16-101, at 12-13. In its role as consultant, MassPowerChoice must ensure that all of its communications with and information submitted to municipalities regarding municipal aggregation fully disclose that savings cannot be guaranteed. Town of Avon, D.P.U. 17-182, at 16 (2018).

f. Conclusion

Based on the findings above, with the required modifications to the Plan and supporting documents, the Department concludes that Worcester has satisfied all substantive requirements in G.L. c. 164, § 134(a). Worcester shall file a revised Plan, Education and Outreach Strategy, and opt-out notice (including a proposed Language Access Document) within 14 days of the date of this Order. The Department will review these materials for compliance with the directives specified above.²⁹

²⁹ Worcester shall also submit a copy of the final opt-out notice and reply card to the Director of the Department’s Consumer Division for review and approval prior to issuance. Town of Southborough, D.P.U. 17-19, at 14 (2017). The final opt-out notice should contain all relevant prices. The return postmark date may be left blank on the final opt-out notice and reply card if the date is not yet known. The final opt-out notice

B. Waiver from Department Regulations Regarding Information Disclosure

General Laws c. 164, § 134, requires that a municipal aggregation plan meet any requirements established by law or the Department concerning aggregated service. In this regard, Worcester has requested a waiver, on behalf of itself and its competitive supplier, from the information disclosure requirements contained in 220 CMR 11.06(4)(c). The Department's regulations at 220 CMR 11.08 permit a waiver from these regulations for good cause shown. As good cause for the waiver, Worcester maintains that the competitive supplier can provide the same information more effectively and at a lower cost through alternate means (Petition at 2).

Worcester's proposed information disclosure strategy is similar to the strategies approved by the Department in other municipal aggregation plan proceedings. See e.g., D.P.U. 13-131, at 29-31; Town of Greenfield, D.P.U. 13-183, at 27-29 (2014). The Department finds that Worcester's proposed alternate information disclosure strategy should allow the competitive supplier to provide the required information to its customers as effectively as the quarterly mailings required under 220 CMR 11.06(4)(c). Accordingly, pursuant to 220 CMR 11.08, the Department grants Worcester's request for a waiver from 220 CMR 11.06(4)(c) on behalf of itself and its competitive supplier.³⁰ To maintain this waiver, as part of its Annual Reports to the Department (see Section VII, below) Worcester must provide sufficient information to show that the competitive supplier has provided the same information to

and reply card must also be filed in the instant docket, in a manner consistent with the Department's filing requirements. 220 CMR 1.02.

³⁰ This waiver is only for Worcester's Program. The competitive supplier must continue to adhere to the applicable provisions of 220 CMR 11.06 for its other customers.

Program participants as effectively as the quarterly mailings required under 220 CMR 11.06(4)(c). Worcester and its competitive supplier are required to adhere to all other applicable provisions of 220 CMR 11.06.

VI. TIMING OF PROGRAM LAUNCH DATE

Although the Attorney General supports approval of Worcester's Plan, she requests that the Department require the City to launch its Program by a date certain in order to remove any negative effect on future basic service prices related to uncertainty about when the Program will launch (Attorney General Initial Comments at 1-3). The City maintains, however, that there is no basis in G.L. c. 164, § 134(a) to adopt the Attorney General's recommendation and to do so could require Worcester to accept a supply bid even where the price or terms were not acceptable to the City (Worcester Reply Comments at 3-4).

Although they have not agreed on a solution, the Department appreciates the willingness of the City and the Attorney General to work together to mitigate the potential impact of the anticipated launch of the City's municipal aggregation Program on basic service rates (see Joint Request of Worcester and Attorney General for a Technical Session (June 28, 2019)). The majority of the City's residents are basic service customers and any negative effect on National Grid's basic service prices will also impact Worcester residents and businesses, at least until Program launch or, for some, beyond.

Launch of the Program will remove the Worcester aggregation-related load-size uncertainty in all National Grid basic service procurements that follow. Therefore, the City represents that it will endeavor to launch its Program as soon as possible after Plan approval (Exh. DPU 1-33). Given our approval of the Plan today, the Department fully anticipates that

Worcester will be able to launch its Program during a December 2019 through February 2020 launch window thereby removing the uncertainty from National Grid's next semi-annual basic service procurement in March 2020³¹ (Exhs. AG 1-1; AG 1-2). For this reason, the Department will not address issues relating to the interaction of the City's Plan and basic service at this time. Instead, the City shall notify the Department, the Attorney General, and National Grid at the earliest possible date that it has accepted a bid and intends to launch its Program during the December 2019 through February 2020 launch window.³²

Conversely, if Worcester does not receive favorable bids or the City otherwise determines that it will not launch the Program during the December 2019 through February 2020 launch window as anticipated, the City shall notify the Department, the Attorney General, and National Grid without delay.³³ Upon receipt of such notice, the Department will determine what, if any, action is appropriate to mitigate the impact of a delayed launch of the City's municipal aggregation Program on basic service rates. At the same time, the Department would encourage the City and the Attorney General to work together in a further attempt to resolve this issue for the benefit of all electricity customers.

³¹ National Grid conducts two residential and small C&I basic service procurements per year (in September and March), each for 50 percent of its required basic service supply for the next year.

³² National Grid will, in turn, provide notice to its bidders for the upcoming basic service procurement (Exh. DPU 1-33).

³³ The City shall provide such notice no later than January 1, 2020.

VII. OTHER REQUIREMENTS

In addition to the requirements set forth in G.L. c. 164, § 134, as discussed above, Worcester shall comply with all additional requirements for municipal aggregations as set forth by the Department. See e.g., D.P.U. 14-69, at 29-30 (requirements for revising a municipal aggregation plan); D.P.U. 13-131-A at 10 (program pricing for customers that join a municipal aggregation program after initiation); D.P.U. 12-124, at 61-66 (prohibiting the practice of suspension); Town of Lanesborough, D.P.U. 11-27, at 24 (2011) (notice requirements to local distribution company).

Worcester shall submit an Annual Report to the Department by March 1st of each year for the previous calendar year.³⁴ The Annual Report shall, at a minimum, provide the following information: (1) a list of the Program's competitive suppliers over the past year; (2) the term of each energy supply agreement; (3) monthly enrollment statistics by customer class (including customer additions and withdrawals); (4) the number and percentage of customers that opted-out of the Program over the past year; (5) a brief description of any renewable energy supply options included in the Program; (6) total annual kWh sales, by customer class, for the standard product and each optional product; (7) a detailed discussion (with all relevant documentation) addressing Worcester and competitive supplier compliance with the alternative information disclosure strategy approved in Section V.B, above; (8) evidence documenting that Worcester has fully complied with all provisions contained in its Plan (including, at a minimum, copies of all opt-out notices and other correspondence with eligible customers and Program participants, copies of

³⁴ The required form and content of municipal aggregation Annual Reports is addressed in D.P.U. 19-MA, Hearing Officer Memorandum (November 28, 2018).

City government meeting notices, minutes of any such meetings, and screenshot images of all relevant Program pages of the websites of Worcester and the consultant); and (9) copies of any complaints received by Worcester, its consultant, or the competitive supplier regarding the Program. Worcester's first Annual Report shall be filed on or before March 1, 2020, covering 2019.³⁵ As the Department continues to gain experience with the operation of municipal aggregation programs, it is fully anticipated that we will refine reporting requirements. Worcester shall adhere to any future directives in this regard.

VIII. CONCLUSION

Consistent with the discussion above, the Department finds that the Plan, with all modifications required herein, including its supporting documents, satisfies all procedural and substantive requirements contained in G.L. c. 164, § 134(a). In addition, with the waiver from the information disclosure requirements contained in 220 CMR 11.06(4)(c) allowed above, the Department finds that the Plan, as amended consistent with the directives contained herein, meets the requirements established by the Department concerning aggregated service. Accordingly, the Department approves Worcester's Plan, as amended consistent with the directives contained herein.

IX. ORDER

Accordingly, after due notice, public hearing, and consideration, it is

ORDERED: That the municipal aggregation plan filed by the City of Worcester, as revised and as amended consistent with the directives contained herein, is APPROVED; and it is

³⁵ To the extent that its Program is not fully operational in 2019, Worcester's Annual Report should so indicate.

FURTHER ORDERED: That the City of Worcester shall comply with all other directives contained in this Order.

By Order of the Department,

/s/
Matthew H. Nelson, Chair

/s/
Robert E. Hayden, Commissioner

/s/
Cecile M. Fraser, Commissioner

X. APPENDIX

See attached model Language Access Document.



Community Choice Aggregation

⚠ IMPORTANT NOTICE

☎ [MUNI TOLL-FREE NUMBER]

📠 TTY [TELEPHONE NUMBER]

🌐 [MUNI WEBSITE]

The Massachusetts Department of Public Utilities directs that we include the following message in all of these different languages. The message states: “Important notice enclosed from [MUNI NAME] about your electricity service. Translate the notice immediately. Call the number or visit the website, above, for help.”

Spanish

Aviso importante adjunto de [MUNI NAME] sobre su servicio de electricidad. Traduce el aviso de inmediato. Llame al número o visite el sitio web, arriba, para obtener ayuda.

Portuguese

Aviso importante incluído em [MUNI NAME] sobre o seu serviço de eletricidade. Traduzir o aviso imediatamente. Ligue para o número ou visite o site acima para obter ajuda.

Chinese (Simplified)

[MUNI NAME]随附关于您的电力服务的重要通知。立即翻译通知。拨打该号码或访问上面的网站寻求帮助。

Chinese (Traditional)

[MUNI NAME]隨附關於您的電力服務的重要通知。立即翻譯通知。撥打該號碼或訪問上面的網站尋求幫助。

Haitian

Anons enpòtan ki anrejistre [MUNI NAME] sou sèvis elektrisite ou. Tradwi avi a imedyatman. Rele nimewo a oswa vizite sit entènèt la, pi wo a, pou èd.

Vietnamese

Thông báo quan trọng kèm theo từ [MUNI NAME] về dịch vụ điện của bạn. Dịch thông báo ngay lập tức. Gọi số hoặc truy cập trang web, ở trên, để được giúp đỡ.

Polish

Ważna uwaga dołączona do [MUNI NAME] na temat usług energetycznych. Przetłumacz natychmiast powiadomienie. Zadzwoń pod numer lub odwiedź powyższą stronę internetową, aby uzyskać pomoc.

Nepali

महत्त्वपूर्ण सूचना [MUNI NAME] बाट तपाईंको बिजुली सेवा को बारे मा संलग्न। सूचना तुरुन्त अनुवाद गर्नुहोस्। मदतको लागि नम्बरमा कल गर्नुहोस् वा वेबसाइट हेर्नुहोस्।

Marathi

आपल्या वीज सेवेबद्दल [MUNI NAME] कडून महत्वाची सूचना. सूचनेचे त्वरित भाषांतर करा. मदतीसाठी नंबरवर कॉल करा किंवा वरील वेबसाइटला भेट द्या.

Yoruba

Akiyesi pataki ti paade lati [MUNI NAME] nipa işe ina re. Tumọ akiyesi leşekese. Pe nomba naa tabi şabewo si oju opo weşbu, loke, fun iranlowo.

Igbo

Ozi di mkpa sitere na [MUNI NAME] banyere oru eletrik gi. Tugharia okwa ozugbo. Kpoo nomba ma o bu gaa na weebusaiti, n'elu, maka enyemaka.

Amharic

ስለ ኤሌክትሪክ አገልግሎትዎ ከ [MUNI NAME] አስፈላጊ ማስታወሻ ተጭኗል ። ማሳሰቢያውን ወዲያውኑ ይተርጉሙ። ቁጥሩን ይደውሉ ወይም ለእገዛ ከዚህ በላይ ያለውን ድርጣቢያ ይጎብኙ።

Russian

Важное уведомление, приложенное от [MUNI NAME] о вашей услуге электроснабжения. Переведите уведомление немедленно. Позвоните по номеру или посетите веб-сайт выше, чтобы получить помощь.

Arabic

إشعار هام مرفق من [MUNI NAME] حول خدمة الكهرباء الخاصة بك. ترجم الإشعار على الفور. اتصل بالرقم أو تفضل بزيارة الموقع أعلاه للحصول على المساعدة.

Khmer

សេចក្តីជូនដំណឹងសំខាន់ដែលភ្ជាប់ពី [MUNI NAME] អំពីសេវាកម្មអគ្គិសនីរបស់អ្នក។ បកប្រែសេចក្តីជូនដំណឹងភ្លាមៗ។ សូមទូរស័ព្ទមកលេខនេះឬចូលមើលគេហទំព័រខាងលើដើម្បីរកជំនួយ។

French

Avis important joint de [MUNI NAME] concernant votre service d'électricité. Traduisez immédiatement l'avis. Appelez le numéro ou visitez le site Web ci-dessus pour obtenir de l'aide.

Italian

Avviso importante allegato da [MUNI NAME] sul servizio di elettricità. Traduci immediatamente l'avviso. Chiama il numero o visita il sito Web, sopra, per assistenza.

Korean

전기 서비스에 대한 [MUNI NAME]에 동봉 된 중요 고지. 통지를 즉시 번역하십시오. 전화를 걸거나 위 웹 사이트를 방문하여 도움을 받으십시오.

Greek

Σημαντική επισήμανση που επισυνάπτεται από το [MUNI NAME] σχετικά με την υπηρεσία ηλεκτρικής ενέργειας. Μεταφράστε την ειδοποίηση αμέσως. Καλέστε τον αριθμό ή επισκεφθείτε τον ιστότοπο, για βοήθεια.

Somali

Ogeysiis muhiim ah oo laga soo qaatay [MUNI NAME] kuna saabsan adeeggaaga korantada. U turjun ogeysiiska isla markaaba. Wac lambarka ama booqo websaydhka, kor, si aad u hesho caawimaad.

Japanese

[MUNI NAME]からのあなたの電気サービスに関する重要な通知。すぐに通知を翻訳してください。電話をかけるか、上記のWebサイトにアクセスしてください。

Gujarati

તમારી વીજળી સેવા વિશે [MUNI NAME] થી બંધ થયેલ મહત્વપૂર્ણ સૂચના. સૂચનાનું તુરંત જ ભાષાંતર કરો. મદદ માટે નંબર પર ૬ Call કરો અથવા વેબસાઇટની મુલાકાત લો.

Swahili

Ilani muhimu iliyofungwa kutoka kwa [MUNI NAME] kuhusu huduma yako ya umeme. Tafsiri ilani mara moja. Piga simu nambari au tembelea wavuti, hapo juu, kwa msaada.

Hindi

आपकी बिजली सेवा के बारे में [MUNI NAME] से संलग्न महत्वपूर्ण सूचना। नोटिस का तुरंत अनुवाद करें। नंबर पर कॉल करें या मदद के लिए ऊपर दी गई वेबसाइट पर जाएं।

Thai

ประกาศสำคัญที่แนบมาจาก [MUNI NAME] เกี่ยวกับการไฟฟ้าของคุณ แปลคำบอกกล่าวทันที โทรไปที่หมายเลขหรือเยี่ยมชมเว็บไซต์ด้านบนเพื่อขอความช่วยเหลือ

Lao

ແຈ້ງການ ສໍາ ຄັນທີ່ມາຈາກ [MUNI NAME] ກ່ຽວກັບການບໍລິການໄຟຟ້າຂອງທ່ານ. ແບບແຈ້ງການໂດຍດ່ວນ. ໂທຫາເບີຫລືເຂົ້າເບິ່ງເວບໄລ໌ທ໌, ຂ້າງເທິງ, ເພື່ອຂໍຄວາມຊ່ວຍເຫຼືອ.

An appeal as to matters of law from any final decision, order or ruling of the Commission may be taken to the Supreme Judicial Court by an aggrieved party in interest by the filing of a written petition praying that the Order of the Commission be modified or set aside in whole or in part. Such petition for appeal shall be filed with the Secretary of the Commission within twenty days after the date of service of the decision, order or ruling of the Commission, or within such further time as the Commission may allow upon request filed prior to the expiration of the twenty days after the date of service of said decision, order or ruling. Within ten days after such petition has been filed, the appealing party shall enter the appeal in the Supreme Judicial Court sitting in Suffolk County by filing a copy thereof with the Clerk of said Court. G.L. c. 25, § 5.