



Town of Jaffrey
10 Goodnow Street
Jaffrey, NH 03452
Telephone (603) 532-7880
Fax (603) 532-7862

Town Manager
Jon R. Frederick
jfrederick@townofjaffrey.com
www.townofjaffrey.com

February 22, 2024

Amanda O. Noonan, Director, Consumer Services
State of New Hampshire Department of Energy
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Town of Jaffrey Community Power Aggregation Plan – CPT 2024-001

Dear Director Noonan,

Please accept this letter advising the Department of Energy and the complainant that the Town of Jaffrey disputes the complaint filed by the Office of the Consumer Advocate.

The first place the complaint falls short is its failure to cite Exhibit II, paragraph 1 of the Community Power Plan (Enclosure 1): “Program Launch. The Town has prepared a preliminary marketing plan and timeline that identifies the steps the Town may take to implement the broad-based public education efforts and send out the optout notification (“Customer Notification Documents”). The schedule is designed to work towards the estimated date when the Customer Notification Documents are scheduled to arrive in retail electric customer’s mailboxes.” The first step identified in the process is, “Shortly after signing the ESA.” According to our Community Power Plan, program launch is a process, not a singular point in time, that begins when the ESA is signed.

The Town of Jaffrey launched its Community Power program on October 4, 2023 when it entered into an Electric Service Agreement (ESA) with First Point Power, LLC, following a competitive bid process. The terms of the ESA established a default rate of \$.10968 per kWh and delivery term of 20 months, from March 2024 through November 2025. The Eversource default rate on that day was \$.12582 per kWh. As cited in the complaint, Jaffrey’s Community Power Plan states on page 11, “Prior to delivery of the bids, the Select Board shall set parameters for accepting a bid, including the price, term and characteristics that are appropriate for its constituents. At minimum, no bid will be accepted at a price higher than the utility default rate at the time of program launch, but the Town may specify stricter criteria. The Select Board shall provide authorization to a designee(s) to select a bid and enter into an ESA based upon those parameters.”

The bid package accepted and ESA executed on October 4, 2023 met all of the criteria cited on page 11 of the Community Power Plan. The Plan’s default rate was \$.016 per kWh lower than the Eversource default rate, making the complaint invalid. The fact that Eversource changed electrical rates after the ESA was signed does not constitute a violation of the terms in the Community Power Plan.

The Town of Jaffrey prohibits discrimination on the basis of race, color, national origin, sex, sexual orientation, religion, age, disability, marital or family status.

The Town of Jaffrey is an equal opportunity employer.

The complaint also cites a statement on a Community Power flyer posted on the town's website prior to the March 2023 Town Meeting. The flyer citation states, "DOES COMMUNITY POWER OFFER LOWEST COST ENERGY CHOICES? Yes. A 'Basic' option offers the best price possible while meeting all state requirements. The Basic option has no additional renewable energy above the state required minimum." This statement says the basic option inside the Community Power plan is the best price possible over the other prices available, such as the default rate, 50% renewable rate, etc., in the plan. The complaint states we are "providing misleading information to customers..." We contend the complaint itself is misleading by taking this citation out of context.

Every household in Jaffrey that utilizes electricity received one of two letters – an opt-in letter or an opt-out letter (Enclosures 2 and 3). Both letters clearly outline all the rates in the ESA and the current Eversource rate. Additionally, the town hosted two public information sessions (only one is required by statute), one on January 25th and the second on February 10th. Information regarding how the rates were set, how we arrived at a point with a rate higher than the Eversource default, the Community Power process, and how to opt out of the program were clearly explained at both sessions.

The Town of Jaffrey has made every effort to be transparent with its residents regarding the Community Power rates we intend to offer at service commencement in March. The rate's 20-month term makes it desirable for those seeking longer term stability, despite the current monetary difference with the Eversource rate. Market timing, our executed ESA, the service commencement date established in the agreement, and Eversource setting a lower rate two months after contract execution have complicated the process. However, we have provided the information necessary for our residents to make their own informed decision.

The Town of Jaffrey finds the complaint filed by the Office of the Consumer Advocate to be misleading and invalid. The complaint ignores relevant information from the Community Power Plan, focuses the launch process on a specific date several months following execution of the ESA, and takes information from the Community Power flyer out of context. Therefore, we intend to proceed with our Community Power service commencement as scheduled.

Sincerely,



Jon R. Frederick
Town Manager

Enclosures: 1) Exhibit II Page 1 of 5 from the Jaffrey Community Power Plan
2) Jaffrey Opt-In Letter
3) Jaffrey Opt-Out Letter

Cc: Michael Crouse, Office of the Consumer Advocate

Exhibit II - Education & Outreach Plan

The following describes the Town's Education & Outreach plan to fully inform and educate potential participants about their opportunities, options and rights for participation in the Program.

The costs and implementation of the Education/Outreach Plan will be handled by the Community Power Consultant, under the direction of the Select Board or their designee.

1. Program Launch

The Town has prepared a preliminary marketing plan and timeline that identifies the steps the Town may take to implement the broad-based public education efforts and send out the opt-out notification ("Customer Notification Documents"). The schedule is designed to work towards the estimated date when the Customer Notification Documents are scheduled to arrive in retail electric customer's mailboxes.

Action	From estimated date Customer Notification Documents arrive in customer mailboxes	
	Days before	Days after
A. Create or Update Webpage and shopping comparison websites	15	-
B. Work with local media resources	15	30
C. Active social media outreach	15	30
D. Initial person presentations	15	30
E. Distribute marketing materials	15	30
F. Customer help line	15	Ongoing
G. Mail postcard to all retail electric customers	5	-
H. Customer Notification Letters arrive	0	0

1.A. Create or Update Webpage and shopping comparison websites

Timeframe: **Shortly after signing the ESA** (~15 days before the estimated date that the Customer Notification Documents arrive).

The Program will maintain an informational webpage with features that include Program details, an online savings calculator and enrollment, opt-up and opt-out forms for the convenience of participants.

The Program page will be maintained on the Town's website. After executing an ESA, the Program will update the Program page with a description of the Program and its products, the



Jaffrey Community Power Opt-In Notification

The Town of Jaffrey is launching our electricity supply program, Jaffrey Community Power. Please read on to learn about the program and your options for participation. You can also learn more at a community meeting on **January 25, 7pm, or February 10, 1pm, at the Jaffrey Fire Station, 138 Turnpike Road.**

The Town has chosen an electricity supplier and negotiated rates for multiple electricity options that are available to our entire community.

Jaffrey’s program starts in March 2024. You may join (opt in) to the program any time, if desired.

If you choose to participate you can leave the program at any time in the future without penalty, effective on your next available monthly meter read date.

Jaffrey Community Power is a group purchasing program that pools the electric use of residents and businesses for stable competitive electricity options and options with additional renewable energy. Town voters approved the program in March 2023.

If you participate in the program, it will change the source and cost of your electricity supply. It will not affect the cost or quality of service for the delivery of electricity from the utility, Eversource. Participation is voluntary, and you can opt out of the program before it starts or at any time in the future, effective on your next available monthly meter read date.

The table below shows pricing and other information for Jaffrey’s electricity supply options compared to Eversource Default Service for six months beginning February 1, 2024.*

	Eversource Default Service	Jaffrey Green Default (automatic)	Jaffrey Basic	Jaffrey Green 50%	Jaffrey Green 100%
Price					
Residential & Commercial	8.285 ¢/kWh	10.968 ¢/kWh	10.568 ¢/kWh	11.648 ¢/kWh	13.648 ¢/kWh
Industrial (GV)	9.0-18.2 ¢/kWh*				
Total Renewable Energy 2024	24%	34%	24%	50%	100%
Duration	6 months Feb 1 to July 31, 2024	20 months [March 2024 to November 2025]	20 months [March 2024 to November 2025]	20 months [March 2024 to November 2025]	20 months [March 2024 to November 2025]
	<i>*Industrial variable price changes monthly</i>				

Renewable energy percentages above are rounded to the nearest whole percent.

Please note, Industrial customers (rate class GV) that seek to Opt-In to Jaffrey’s program may be offered a price other than those shown in the table and that reflect the latest market conditions. In that event, the supplier will ask you to confirm any such price before you are enrolled.

*Recent six-month Eversource Default Service rates: beginning February 1, 2022 (10.669 ¢/kWh), August 1, 2022 (22.566 ¢/kWh); February 1, 2023 (20.221 ¢/kWh); and August 1, 2023, to January 31, 2024 (12.582 ¢/kWh).

HOW JAFFREY COMMUNITY POWER WORKS

- If you participate in the program the impact on your electricity bill from Eversource, will be:
 - The Supplier portion of the bill will change to reflect your participation in **Jaffrey Community Power**.
 - Eversource will continue to provide all Delivery Services, including responding to power outages, and Eversource will continue to send you the electricity bill.
 - Customers that receive a discount on their electricity bill through the Electric Assistance Program (EAP) will continue to receive their benefits.
 - Budget billing customers will continue to receive budget billing for the Delivery Services portion of the bill.
- Program participants that receive credits from solar panels or other net metering may or may not receive their full credits on their electric bills. For NEM 2 customers, the utility supply credit is zero for sales that exceed purchases. **See the net-metering FAQ sheet** on the program website JaffreyCommunityPower.com or call our dedicated net metering support line 877-877-1670 ext 3 to learn more about how your net metering benefits may be affected.

- **Pricing:** Program prices apply to service beginning and ending on the days of the month that your meter is read. Program prices include a fee of \$0.001 per kilowatt hour (kWh) for the Town's aggregation consultant. Any applicable taxes will be added by Eversource to your bill. The Town will announce price changes at least 30 days before any such price change takes effect. Product details will always be available on the program website: JaffreyCommunityPower.com.

- **Renewable Energy:** All program options include renewable energy to meet the State of New Hampshire's Renewable Portfolio Standard (RPS), 24.3% in 2024. "Jaffrey Green Default" adds 10% voluntary renewable energy to the RPS. Jaffrey Green 50% and Green 100% add voluntary renewable energy to total 50% and 100% renewable energy, respectively. All voluntary renewable energy comes from sources that qualify as NH Class I, the State's designation for new renewable energy located in or imported into New England.

- **Supplier:** The program is served by First Point Power, PUC license number: DM 21-059.

TO JOIN THE PROGRAM

To enroll in a Jaffrey Community Power option, call our electricity supplier, First Point Power, at 888-875-1711, or complete the request form on JaffreyCommunityPower.com.

If enrolled in Jaffrey's program, at any time in the future you may still opt out of the program, without penalty, or switch to another Jaffrey option by calling the supplier or using JaffreyCommunityPower.com. Changes are effective on your next available monthly meter read date.

QUESTIONS & SUPPORT

- For information or customer support about Jaffrey's program, please visit JaffreyCommunityPower.com, or call 888-875-1711.
- If you have questions about the Delivery Services portion of your bill or about utility Default Service supply, contact the utility Eversource at (800) 662-7764, or by visiting Eversource.com.

Still have questions or need support? Use the contact form on <https://JaffreyCommunityPower.com> or call the Jaffrey Town Office at (603) 532-7445 for assistance.



Jaffrey Community Power

The Town of Jaffrey is launching our electricity supply program, Jaffrey Community Power. Please read on to learn about the program and your options for participation. You can also learn more at a community meeting on **January 25, 7pm, or February 10, 1pm, at the Jaffrey Fire Station, 138 Turnpike Road.**

The Town has chosen an electricity supplier and negotiated rates for multiple electricity options that are available to our entire community.

Your electricity account is scheduled for enrollment in the “Jaffrey Default” option. No action is necessary to receive this option.

You may opt out and not participate. The deadline to opt out before the program starts is February 21, 2024. If you participate, you may leave the program at any time in the future without penalty, effective on your next available monthly meter read date.

Jaffrey Community Power is a group purchasing program that pools the electric use of our residents and businesses to provide stable competitive rates and options with additional renewable energy. Town voters approved the program in March 2023. If you participate in the program it will change the source and cost of your electricity supply. It will not affect the cost or quality of service for the delivery of electricity from the utility, Eversource. **Participation is voluntary, and you can opt out of the program before it starts or at any time in the future effective on your next available monthly meter read date.**

By receiving this letter, you will be enrolled in the “Jaffrey Default” option unless you take one of the following actions prior to February 21, 2024:

1 Choose to enroll in another Jaffrey Community Power program option

OR

2 Choose to opt out of the program and continue with Default Service from Eversource (see page 2 of this notice for options for opting out or changing products.)

The table below shows pricing and other information for Jaffrey’s electricity supply options compared to Eversource Default Service for six months beginning February 1, 2024.*

	Eversource Default Service	Jaffrey Green Default (automatic)	Jaffrey Basic	Jaffrey Green 50%	Jaffrey Green 100%
<i>Price</i>					
Residential & Commercial	8.285 ¢/kWh	10.968 ¢/kWh	10.568 ¢/kWh	11.648 ¢/kWh	13.648 ¢/kWh
Industrial (GV)	9.0-18.2 ¢/kWh*				
Total Renewable Energy 2024	24%	34%	24%	50%	100%
Duration	6 months Feb 1 to July 31, 2024 <i>*Industrial variable price changes monthly</i>	20 months [March 2024 to November 2025]	20 months [March 2024 to November 2025]	20 months [March 2024 to November 2025]	20 months [March 2024 to November 2025]

Renewable energy percentages above are rounded to the nearest whole percent.

*Recent six-month Eversource Default Service rates: beginning February 1, 2022 (10.669 ¢/kWh), August 1, 2022 (22.566 ¢/kWh); February 1, 2023 (20.221 ¢/kWh); and August 1, 2023 to January 31, 2024 (12.582 ¢/kWh).

HOW JAFFREY COMMUNITY POWER WORKS

- If you participate in the program the impact on your electricity bill from Eversource, will be:
 - The Supplier portion of the bill will change to reflect your participation in **Jaffrey Community Power**.
 - Eversource will continue to provide all Delivery Services, including responding to power outages, and Eversource will continue to send you the electricity bill.
 - Customers that receive a discount on their electricity bill through the Electric Assistance Program (EAP) will continue to receive their benefits. Budget billing customers will continue to receive budget billing for the Delivery Services portion of the bill.

- Program participants that receive credits from solar panels or other net metering may or may not receive their full credits on their electric bills. For NEM 2 customers, the utility supply credit is zero for sales that exceed purchases. **See the net-metering FAQ sheet** on the program website JaffreyCommunityPower.com or call our dedicated net metering support line 877-877-1670 ext 3 to learn more about how your net metering benefits may be affected.

- **Pricing:** Program prices apply to service beginning and ending on the days of the month that your meter is read. Program prices include a fee of \$0.001 per kilowatt hour (kWh) for the Town's aggregation consultant. Any applicable taxes will be added by Eversource to your bill. The Town will announce price changes at least 30 days before any such price change takes effect. Product details will always be available on the program website: JaffreyCommunityPower.com.
- **Renewable Energy:** All program options include renewable energy to meet the State of New Hampshire's Renewable Portfolio Standard (RPS), 24.3% in 2024. "Jaffrey Default" adds 10% voluntary renewable energy to the RPS. Jaffrey Green 50% and Green 100% add voluntary renewable energy to total 50% and 100% renewable energy, respectively. All voluntary renewable energy comes from sources that qualify as NH Class I, the State's designation for new renewable energy located in or imported into New England.
- **Supplier:** The program is served by First Point Power, PUC license number: DM 21-059.

NEXT STEPS

As a recipient of this letter, no action is necessary for you to receive the "Jaffrey Default" electricity option.

- **To choose another program option, Jaffrey Basic, Green 50% or Green 100%:** Call the program's electricity supplier, First Point Power, at 888-875-1711, or complete the request form on JaffreyCommunityPower.com.
- **To Opt Out & not participate:** To remain with Default Service from Eversource for your electricity supply, you must opt out. To opt out before being enrolled you must take one of the following actions on or before February 21, 2024:

Postmark and mail the enclosed opt-out card *or* call Jaffrey's Supplier, First Point Power at 888-875-1711 *or* submit the opt-out form at JaffreyCommunityPower.com

If enrolled in the program, at any time in the future you may still opt out of the program, without penalty, or switch to another program option by calling the supplier or using the online forms on JaffreyCommunityPower.com.

QUESTIONS & SUPPORT

- For information or customer support about the program, please visit JaffreyCommunityPower.com, or call the Supplier at 888-875-1711, or for additional net metering questions call our dedicated help line at 877-877-1670 ext.3.
- If you have questions about the Delivery Services portion of your bill or about Default Service supply, contact the utility Eversource at (800) 662-7764, or by visiting Eversource.com.
- If you are receiving electricity supply from a competitive supplier and believe you have received this opt-out letter in error, you must notify Jaffrey's supplier as outlined above. This will ensure you continue to receive your electricity from that competitive supplier and prevent any possible early termination fees.

Still have questions or need support? Use the contact us form on <https://JaffreyCommunityPower.com> or call the Jaffrey Town Office at (603) 532-7445 for assistance.