

TOWN OF MILFORD

TOWN ADMINISTRATION

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 Milford Community Power Aggregation Plan – CPT 2024-003

Dear Director Noonan,

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

The Town of Milford entered into an Electric Service Agreement (ESA) with First Point Power, LLC on October 4, 2023 at a default rate of \$0.10568 per kWh (effective rate) and delivery term of 20 months (March 2024 through November 2025). On November 16, 2023 pursuant to PUC 2204.04, Standard Power submitted a Notification of Community Power Aggregation Commencement of Service letter to the New Hampshire Public Utilities Commission on behalf of the Towns of Milford, New Boston, and Jaffrey (Enclosure 1). The Notification states that the aggregation programs would begin on or after February 20, 2024. The Eversource default rate on that day was \$0.12582 per kWh. No information was available indicating what Eversource would set as its rate in December 2023.

On December 14, 2023, over two months following the execution of Milford's ESA with First Point Power, Eversource announced its new default rate of \$0.0829 per kWh.

As cited in the complaint, Milford's Community Power Plan states in Exhibit 1, page 2 of 3, that "The program does not launch unless the program default is lower than the utility default rate." The Community Power Plan also states on page 10 of 19 that "Prior to delivery of the bids, the Board of Selectmen shall set parameters for accepting a bid, including the price, term and characteristics that are appropriate for its constituents. The Board of Selectmen 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 above stated criteria. If it were possible to begin immediately upon signing the ESA in October, the Town certainly would have made every effort to move forward. However, the bid package we were offered and ultimately agreed upon was scheduled to begin in March 2024.

Following notification of the Eversource rate in December, we consulted with the town's consultant for guidance on how to proceed. The guidance we received was that the 20-month rate at \$.10968 per kWh is a competitive rate with Eversource because of the stability granted by its longer duration. Eversource cannot offer the same stability due to its rates changing every six months. Therefore, the Town proceeded forward..

Every residential and small commercial electrical customer in Milford 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 one public information session on January 31st and a walk-in public meeting session on February 21st (only one is required by statute). Information regarding how the rates were set, how we arrived at a point with a rate higher than the Eversource default, the Community Power start up, and how to opt out of the program were clearly explained at both sessions.

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 statement out of context.

The Town of Milford has made every effort to be transparent with its residents regarding the Community Power rate and the established process detailed in the ESA and Milford Community Power Plan. The rate's 20-month stability makes it a competitive rate, despite the current difference with the Eversource rate. Market timing, our executed ESA, the delay inherent in the agreement, and Eversource setting a lower rate two months after contract execution have complicated the process leading to the effectuation of the plan and customer startup. However, the Town has provided the information necessary for our residents to make their own informed decision. Milford energy users who are supplied electricity by First Point Power, LLC via this ESA may decide to opt out from this electric service without a penalty to either the electric supply user or a penalty to the Town.

The Town of Milford finds the complaint filed by the Office of the Consumer Advocate to be misleading by ignoring relevant information from the Community Power Plan and by taking information out of context and failing to account for the volatility in the marketplace. We intend to proceed with our Community Power program as scheduled.

Sincerely,



Lincoln Daley
Town Administrator



November 16, 2023

Daniel Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street
Concord, NH 03301

Email: ClerksOffice@puc.nh.gov

Dear Chairman Goldner,

Pursuant to Puc 2204.04, I am writing to provide official Notification of Community Power Aggregation Commencement of Service to begin on or after February 20, 2024, for the following municipalities working with Standard Power as their agent for the purposes of implementing and operating their Community Power services:

1. DE 23-022 Town of Jaffrey for Jaffrey Community Power
2. DE 23-023 Town of New Boston for New Boston Community Power
3. DE 23-029 Town of Milford for Milford Community Power

These programs will each operate on an opt-out basis as described in their approved Community Power Plans filed with the Commission in the above-listed dockets. This notification satisfies the 90-day notification period required under Puc 2204.04(b)(2) for programs beginning service during the first two months of the utility default service supply period.

These municipalities are served entirely by Eversource, which is currently notified with this submission, along with the Department of Energy and the Office of the Consumer Advocate. Pursuant to current Commission policy, this filing is being made electronically only.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Emily Manns
Community Power Advisor
Standard Power
17 Technology Way
Nashua, NH 03060
(603)831-3817 direct

cc: ocalitigation@oca.nh.gov, registrations@energy.nh.gov, energy-litigation@energy.nh.gov,
daryush.donyavi@eversource.com, SupplierServicesNH@eversource.com,
NHregulatory@eversource.com and jessica.chiavara@eversource.com



Milford Community Power Opt-In Notification

The Town of Milford is launching our electricity supply program, Milford 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 **Wednesday, January 31, 2024, at 6pm at Town Hall.**

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

Milford’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.

Milford 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 Milford’s electricity supply options compared to Eversource Default Service for six months beginning February 1, 2024.*

	Eversource Default Service	Milford Default (automatic)	Milford 10%	Milford 50%	Milford 100%
<i>Price</i>					
Residential & Commercial	8.285 ¢/kWh	10.568 ¢/kWh	10.968 ¢/kWh	11.648 ¢/kWh	13.648 ¢/kWh
Industrial (GV)	9.0-18.2 ¢/kWh*				
Total Renewable Energy 2024	24%	24%	34%	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.

Please note, Industrial customers (rate class GV) that seek to Opt-In to Milford’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 MILFORD 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 **Milford 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 MilfordCommunityPower.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: MilfordCommunityPower.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. "Milford 10%" adds 10% voluntary renewable energy to the RPS. Milford 50% and 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 Milford Community Power option, call our electricity supplier, First Point Power, at 888-875-1711, or complete the request form on MilfordCommunityPower.com.

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

QUESTIONS & SUPPORT

- For information or customer support about Milford's program, please visit MilfordCommunityPower.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://MilfordCommunityPower.com> or call the Town Offices for assistance.



Milford Community Power

The Town of Milford is launching our electricity supply program, Milford 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 **Wednesday, January 31, 2024, 6pm at Town Hall.**

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 “Milford 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 25, 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.

Milford 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 “Milford Default” option unless you take one of the following actions prior to February 25, 2024:

- 1 **Choose to enroll in another Milford 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 Milford’s electricity supply options compared to Eversource Default Service for six months beginning February 1, 2024.*

	Eversource Default Service	Milford Default (automatic)	Milford Plus	Milford 50%	Milford 100%
<i>Price</i>					
Residential & Commercial	8.285 ¢/kWh	10.568 ¢/kWh	10.968 ¢/kWh	11.648 ¢/kWh	13.648 ¢/kWh
Industrial (GV)	9.0-18.2 ¢/kWh*				
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	*Industrial variable price changes monthly				

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

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HOW MILFORD 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 **Milford 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 MilfordCommunityPower.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: MilfordCommunityPower.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. "Milford Plus" adds 10% voluntary renewable energy to the RPS. Milford 50% and 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 "Milford Default" electricity option.

- **To choose another program option, Milford Plus, 50% or 100%:** Call the program's electricity supplier, First Point Power, at 888-875-1711, or complete the request form on MilfordCommunityPower.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 25, 2024:

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

QUESTIONS & SUPPORT

- For information or customer support about the program, please visit MilfordCommunityPower.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 Milford'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://MilfordCommunityPower.com> or call the Milford Town Offices for assistance.