

TOWN OF DUNBARTON, N.H.

Office of the Selectmen 1011 School Street, Dunbarton, N. H. 03046

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October 11, 2024

Chairman Daniel C. Goldner New Hampshire Public Utilities Commission 21 South Fruit Street Concord, New Hampshire 03301 via e-mail to: ClerksOffice@puc.nh.gov

Re: Docket No. DE 24-104 Town of Dunbarton Community Power Electric Aggregation Plan

Dear Chairman, Goldner:

The Town of Dunbarton welcomes all public input into our Plan, and considers all input in the spirit of improving our Plan and program. We have reviewed the comments of the OCA dated September 25 in the above-mentioned docket and find them capricious, untimely and without merit.

The Town of Dunbarton intends to implement a Community Power Plan and program that fully complies with all applicable laws and rules, and is in the best interest of our residents and businesses on all matters including rates, terms and public notification. To this end, Dunbarton approved a clear and flexible Plan based on local input, the law and rules. The Plan has been refined by our services provider, Standard Power. This process included dozens of surveys and public input sessions, hundreds of public comments and survey respondents, thousands of voters, and 24 approvals by the Commission of similar Plans. These Plans include, but do not require, provision for a green default, to be implemented under the responsibility of the Board of Selectmen. We ask the Commission to rule favorably on our Plan as written without delay.

Dunbarton's Plan is not like the Plans written by the services provider referenced in the OCA complaint, which Dunbarton rejected, in part because they abrogate local control of rates and terms to a corporate board, add hundreds of pages of binding contracts and fine print, including complex procedures, retained reserve funds, and an onerous termination process.

Dunbarton's customers are offered clear simple rate choices for a fixed term longer than the utility default of six months and assistance to choose a rate based on their needs, or to opt out, before the program starts or during the program. Regarding the OCA's complaints about customer notifications and opt out provisions, Dunbarton already exceeds the elements and timing required in the rules. Adding costs and mailing time to our thorough process won't solve the problem identified with the USPS, but may have the perverse effect of the program dropping the optional return cards all together, as they are not a required element in New Hampshire. With that said, we continually look for ways to improve outreach to our customers, as allowed and encouraged in our Plan as written.

Thank you for your prompt attention to this matter. Please let me know if you have any questions.

Sincerely,

Line Comeau Town Administrator

cc:

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