# TOWN OF STOUGHTON COMMUNITY CHOICE POWER SUPPLY PROGRAM

# **EDUCATION AND INFORMATION PLAN**

# PREPARED BY

# COLONIAL POWER GROUP, INC.

# 1 OVERVIEW AND PURPOSE

M.G.L. c. 164, § 134(a) requires that municipal aggregators "fully inform participating ratepayers in advance of automatic enrollment that they are to be automatically enrolled and that they have the right to opt-out of the aggregated entity without penalty. In addition, such disclosure shall prominently state all charges to be made and shall include full disclosure of the basic service rate, how to access it, and the fact that it is available to them without penalty."

The Education and Information Plan ("Education Plan") component of the Town of Stoughton's ("Town") Community Choice Power Supply Program ("Program") is two-pronged. The first is general education through which the Town, with the assistance of its municipal aggregation consultant, will provide information to eligible consumers by way of the media, electronic communications, and public presentations. The second is direct mail notification which will be mailed out to eligible consumers and will contain information regarding participation and rights.

The purpose of the Town's Education Plan is to raise awareness and provide eligible consumers with information concerning their opportunities, options and rights for participation in the Program.

The Education Plan consists of two parts:

a) General Education: This will be conducted through the media, public meetings and presentations, and electronic communications and will inform eligible consumers about the Program.

b) <u>Direct Mail Notification:</u> This will be mailed out to eligible consumers and will contain information regarding participation and rights, as well as comparative prices and terms.

The general education effort will provide a broad back drop for the direct mail notification, boosting awareness of the mailing and its purpose and providing reinforcement of key information.

# 1.1 GENERAL EDUCATION

The general education will provide a description of the Program for eligible consumers. It will consist of a public relations effort, advertising outreach, public presentations and electronic information sources (i.e. toll-free telephone number, websites, etc.). The general education will provide specific information about the Program and maximize the impact of the direct mail notification which will create an environment of public awareness.

#### 1.1.1 Press Conference

The initial launch of the Program will be a media event featuring representatives from the Town, its Competitive Supplier, and its initial municipal aggregation consultant, Colonial Power Group, Inc. (CPG). This event will be designed to create an understanding of the Program as a whole including consumer rights and benefits. Representatives from local and regional print and broadcast sources will be invited to attend.

A press kit will be assembled to introduce the Program. Materials may include:

- a) news release;
- b) background information;
- c) deregulation and choice information; and
- d) frequently asked questions.

# 1.1.2 Media Outreach

Following the launch of the Program, media outreach will continue through local cable television shows, newspapers and internet sources to provide greater public education and to describe the Program, the opt-out process and the toll-free telephone number. Outreach will include public service announcements (PSAs), scheduling interviews of Program spokespersons with local media outlets and securing a positive media presence.

A series of news releases will be distributed to achieve the aforementioned goals. Follow-up news releases will update the media on the status of the Program's progress.

Sample Media List:

- a) Boston Globe
- b) Brockton Enterprise

- c) Stoughton Journal
- d) Local Cable TV Comcast Channel 98 Stoughton Media Access Corp (SMAC)

# 1.1.3 Notices and Public Postings

Notices in newspapers and in Town Hall describing the Program, the opt-out process and the toll-free telephone number will further reinforce the Program's details. Postings will be placed in public buildings (i.e. library, Senior Center, etc.) which will create the necessary repetition of messages required to motivate consumer action and build awareness and understanding.

#### 1.1.4 Customer Service Center

CPG will maintain a toll-free telephone number to address eligible consumer's questions regarding the Program, deregulation, the opt-out process, price information and other issues eligible consumers may raise. CPG's customer service center has the capability to provide interpretation services for more than 200 different languages.

# 1.1.5 Website

All information regarding the Program will be posted on the Program website maintained by the municipal aggregation consultant (<a href="https://colonialpowergroup.com/stoughton/">https://colonialpowergroup.com/stoughton/</a>), which is linked to the Town's website.

The Program website will note if the Town has chosen to fund personnel costs associated with an Energy Manager position(s) through an Operational Adder. The Program website will have links to National Grid ("Local Distributor"), the Massachusetts Department of Energy Resources (DOER), the Massachusetts Department of Public Utilities ("Department"), and the Town's Competitive Supplier.

At a minimum, the Town will provide basic information about the Program in a prominent location on its website with the appropriate links to the Program website. All of the Town's Program documents (including the Department-approved Aggregation Plan, Education Plan, optout notification and executed Electric Service Agreement) and education materials will remain available and updated on the Program website.

# 1.1.6 Translation Services

CPG's website is equipped with translation services. This will provide for all information regarding the Program to be translated into more than 100 languages. The Town will retain any additional translation services as it determines to be necessary or appropriate for eligible consumers who are hard-to-reach, English is not their primary language or self-identify as speaking English "less than very well".

#### 1.1.7 Public Presentations

CPG will provide presentations to the Select Board and to any interested community group (i.e. Chamber of Commerce, Energy & Sustainability Committee, etc.). The Town will seek to identify and potentially work with appropriate community and neighborhood-based groups to assist with education and outreach efforts. The Town may leverage email lists and newsletters to ensure consumers are receiving accurate and timely information.

# Sample Community Groups:

- a) Old Colony Planning Council
- b) Stoughton Energy & Sustainability Committee
- c) Stoughton Council on Aging
- d) Sustainable South Shore
- e) Mothers Out Front

# 1.1.8 Impaired Physical Capabilities

The Town will employ assistive technology to ensure all eligible consumers, including those with impaired physical capabilities who require visual or audial assistance, are properly informed. Information sessions will be held in accessible locations, typically Town Hall, the Senior Center or the library. Consumers who require assistance (e.g. deaf or otherwise hard-of-hearing, blind or otherwise visually impaired) will have the opportunity to request assistive technology ahead of any such public presentation. In the event that information sessions cannot be held in-person, the presentations will be held online and, as such, will be accessible to consumers with limited mobility.

The opt-out notification will include a separate Language Access Document which will provide instructions regarding how consumers can receive visual or audial assistance with Program information.

# 1.1.9 Information Disclosure

The Town will provide the disclosure information required under M.G.L. c. 164, § 1F(6) and 220 C.M.R. 11.06. Like other Massachusetts aggregations, the Town requested a waiver from the requirement that its Competitive Supplier mail an information disclosure label directly to participating consumers on a quarterly basis and instead sought permission to provide the information regarding fuel sources, emissions and labor characteristics by alternative means, including press releases, postings at Town Hall, and postings on the Town's website and the Program website. Based upon information available to it, the Town and CPG believe that other means are as likely, if not more likely, to effectively deliver the information required by the statute and regulations. The Department has granted the Town's request for a waiver from the information disclosure requirements, subject to the Town's demonstration in each Annual Report to the Department that its Competitive Supplier has provided the same information to participating consumers as effectively as the quarterly mailings required under 2020 CMR 11.06(4)(c).

# 1.1.10 Ongoing Education and Outreach

Once the Program is up and running, education and outreach will continue and will be ongoing. Many of the same vehicles that were utilized prior to and during the launch of the Program will be leveraged to ensure participating consumers are updated in a timely manner on the status of the Program's progress and alerted to any changes in the price and product offering. This will be accomplished through electronic communications, the media, and public meetings and presentations. Specifically, the Town will notify consumers using the following methods: Town website and the Program website; press releases and local cable television shows; and presentations to the Select Board or to any interested community group (i.e. Chamber of Commerce, Energy & Sustainability Committee, etc.). In addition, notices will be placed in newspapers, in Town Hall and in public buildings (i.e. library, Senior Center, etc.) further describing the Program's details including the price, the product offering, the opt-out information and the toll-free telephone number. CPG will continue to maintain a toll-free telephone number to address eligible and participating consumers' questions regarding the Program, price information, product offerings, and other issues eligible and participating consumers may raise.

To assist consumers with limited English proficiency and consumers who require visual or audial assistance, the Town will leverage many of the same vehicles that were utilized prior to and during the launch of the Program, which will ensure participating consumers are alerted to any changes in Program price and product offering. CPG's website is equipped with translation services for more than 100 languages. CPG's customer service center has the capability to provide interpretation services for more than 200 different languages. The Language Access Document that accompanies the opt-out notification will include meaningful messaging translated into 26 languages as well as the MassRelay TTY phone number for both English- and Spanish-speaking consumers. Lastly, customer support will be available both verbally via CPG's toll-free telephone number and online via CPG's web form.

#### 1.2 DIRECT MAIL NOTIFICATION

# **1.2.1** Opt-Out

The opt-out notification will be sent via standard mail to the billing address of each eligible consumer receiving Basic Service. The notification envelope will be clearly marked as containing time sensitive information related to the Program. The notification will contain a letter describing the Program.

# The letter will:

- a) introduce and describe the Program and provide information regarding participation and rights;
- b) inform eligible consumers they have the right to opt-out of the aggregated entity without penalty;
- c) prominently state all charges to be made and a comparison of price and primary terms
  of the Competitive Supplier and Basic Service, and that savings cannot be
  guaranteed;

- d) inform eligible consumers if the Town has chosen to fund personnel costs associated with an Energy Manager position(s) through an Operational Adder;
- e) explain the opt-out process;
- f) inform eligible consumers if the Town has chosen to offer an optional product and explain the opt-in process; and
- g) include instructions for consumers who are hard-to-reach, English is not their primary language or self-identify as speaking English "less than very well" (i.e. toll-free telephone number), or require visual or audial assistance.

The opt-out notification will also contain a reply card with a simple check off and signature line for eligible consumers who do not wish to participate. Eligible consumers will have 30 days from the date of receipt of the mailing to postmark and return the opt-out reply card in the pre-addressed envelope provided. Program enrollments shall begin no sooner than 37 days after the mailing of the opt-out notification.

Upon initiation of service, these new eligible consumers (i.e. consumers who move to Town after Program initiation) will receive the same opt-out information as all other eligible consumers. New eligible consumers will be enrolled in the Program in accordance with applicable Local Distributor rules.

# 1.2.2 Limited English Proficiency

The opt-out notification will include a separate Language Access Document to ensure that the mailing is meaningful to all consumers with limited English proficiency and other language access needs. The required Language Access Document will translate the following text into 26 languages.

Important notice enclosed from Town of Stoughton about your electricity service. Translate the notice immediately. Call the number or visit the website, above, for help.

# 2 TIMELINE

The schedule below assumes timely preparation of mailing lists as well as space and time availability in the media. Meetings and public presentations will be scheduled upon mutually agreeable schedules. On-going education will continue beyond the 47-day period outlined below through the media and the toll-free telephone number.

- Day 0: Press conference held announcing the Program and introducing the Competitive Supplier
- Day 1: Customer service center (i.e. toll-free telephone number) opens
- Day 1: Press release issued on direct mail notification and start-up of the customer service center
- Day 1: Program information posted on the following websites: CPG, Town, and Competitive Supplier
- Day 1-7: Postings placed in public buildings

- Day 1-40: Public presentations provided informing community groups about the Program and eligible consumer rights
- Day 1-40: Media interviews conducted with Program representatives, as needed
- Day 10: Direct mail notification sent to each eligible consumer
- Day 12-35: Display ads placed in newspapers describing the Program and the opt-out process and providing the toll-free telephone number
- Day 13: Eligible consumers receive opt-out notification; opt-out period begins
- Day 13-43: Eligible consumers wishing to opt-out return reply card in pre-paid envelope
- Day 14: Local cable television show airs describing the Program and the opt-out process and providing the toll-free telephone number
- Day 16-30: PSAs air describing the Program and the opt-out process and providing the toll-free telephone number
- Day 43: Deadline for eligible consumers to postmark the opt-out reply card
- Day 47: Earliest date Program enrollments may begin for eligible consumers who do not opt-out
- Day 47+: On-going education continues through the media, the toll-free telephone number and individual opt-out mailings to new eligible Basic Service consumers
- Day 90+: Follow-up news releases issued summarizing the Program's status

# 3 BUDGET

Notification Method	Responsible Party	<b>Estimated Cost</b>
Direct Mailing	Competitive Supplier	\$19,500
Press Conference	CPG	\$500
Television Media	CPG	\$500
Newspaper Media	CPG	\$2,000
Electronic Communications	CPG	
Public Presentations	CPG	