



TOWN OF UPTON COMMUNITY CHOICE POWER SUPPLY PROGRAM

EDUCATION AND OUTREACH 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 Outreach Plan (“Education Plan”) component of the Town of Upton’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) Direct Mail Notification: 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) Worcester Telegram
- b) MetroWest Daily News
- c) Milford Daily News
- d) Upton Town Crier
- e) Local Cable TV – Charter Channel 192 Upton Community Television (UCTV)

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 (<https://colonialpowergroup.com/upton/>), 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, opt-out 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, Green Designation 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) Upton Green Designation Committee
- b) Upton Council on Aging
- c) Sustainable Upton
- d) Milford Area Chamber of Commerce
- e) Greater Franklin Node 350 MA

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 aural 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 aural 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 has 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 seeks permission to provide the information regarding fuel sources, emissions and labor characteristics by the alternative means described below. 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. As the Department has granted for other municipal aggregation programs, this alternate information disclosure strategy will allow its Competitive Supplier to provide the required information to participating consumers as effectively as the quarterly mailings required under 220 CMR 11.06(4)(c).

The Town will publicize the information disclosure label on a quarterly basis upon receipt of each updated label from its Competitive Supplier. This is expected to occur each year in April, July, October and January.

The Town will publicize and post each updated label using vehicles deemed most effective by the Town. The Town will refine its manner of communication as the relative effectiveness of different vehicles changes over time (including new vehicles not yet contemplated).

The Town will post the most current information disclosure label in the “Resources” section on the Program website. In addition, at the launch of the Program, the Town intends to post the most current label:

- a) on bulletin boards located at Town Hall, the Senior Center and the library;
- b) as a news item on the home page of the Town’s website; and
- c) on the Town’s official social media pages for Facebook and Twitter.

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 mail, electronic communications, the media, and public meetings and presentations. Specifically, the Town will notify consumers using the following methods: direct mail notice to participating consumers (received no later than 30 days prior to the effective date of the price change), Town website and 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, Green Designation Committee, etc.). In addition, notices will be placed in newspapers, in Town Hall and in public buildings (i.e. library, Senior Center, etc.). All such notifications will describe the Program’s details including the price, term, fees, product offering(s)(including renewable energy content), toll-free telephone number, and will contain the then-applicable Basic Service rate and inform participating consumers that they may opt-out of the Program at any time and return to Basic Service at no charge.

CPG will continue to maintain a toll-free telephone number to address consumers’ questions regarding the Program, price information, product offerings, and other issues eligible and participating consumers may raise. Both the Town’s website and the Program website will provide contact information for telephone or email inquiries. Town officials will also be available for in-person discussions, as appropriate. Similarly, CPG will be available by telephone and/or email to address consumer inquires or issues and such information will be posted on the Program website.

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.

If there is a change in law¹ that results in a direct, material increase in costs or taxes during the supply contract term, the Town will seek to negotiate a change in the Program price or other terms with the Competitive Supplier. At least 30 days prior to the implementation of any such change, the Town will notify participating consumers of the change in price as described above.

Additionally, the Town will notify the Director of the Department's Consumer Division prior to the implementation of any change in the Program price related to a change in law (e.g., regulatory event or new taxes). Such notification to the Department will occur no less than ten days prior to the Town notifying participating consumers and will include copies of the mailed notice, all public notices, press releases, Town Hall and website postings and any other communications the Town intends to provide consumers regarding the Program's change in price.

In the event the Program is terminated, the Town will follow the procedures outlined in the Department-approved Aggregation Plan for notifying participating consumers, the Local Distributor and the Director of the Department's Consumer Division.

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;

¹ The term "change in law" also defines the term "New Taxes" as used in Article 17 of the Electric Service Agreement.

- 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 product summary form and 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, 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.

At least 30 days prior to the effective date of a new supply contract term, participating consumers will receive a mailed notification informing them of the change. Participating consumers who are (i) enrolled in the Program’s standard product or (ii) enrolled in an optional product that will be offered again in the new contract, will be notified that they will be re-enrolled in the same product offering unless they affirmatively opt-out or enroll in an alternative product. Participating consumers enrolled in a Program optional product that (i) will not be offered under the new contract or (ii) no longer conforms to the product offering as originally described, will be invited to select from one of the new product offerings or to opt-out. Any such consumer that does not make a selection or does not opt-out will be returned to Basic Service.

1.2.2 Limited English Proficiency

The languages spoken by Town residents who self-identify as speaking English “less than very well” is presented below. The table assumes a total population of 7,336.

Language	Speaks English “Less Than Very Well”	% of Total Population
Spanish	16	0.22%
Chinese	27	0.37%
Other Asian	15	0.20%
Arabic	7	0.10%
Total	65	0.89%

Program: 2015 American Community Survey

Source:

https://data.census.gov/cedsci/table?t=Language%20Spoken%20at%20Home&g=0100000US_0

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 Upton 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	Estimated Cost
Direct Mailing	Competitive Supplier	\$5,500
Press Conference	CPG	\$500
Television Media	CPG	\$500
Newspaper Media	CPG	\$2,000
Electronic Communications	CPG	-----
Public Presentations	CPG	-----