



david

Date: May 7, 2025
To: Municipal Light Board: Warren Leon, John Dalton, Brian Foulds, Bianca Taylor and Chris Schaffner
From: Jason Bulger, CMLP Director
Subject: Agenda for virtual Light Board meeting on **Wed., May 14, 2025, at 7:30 A.M.** (link below)

7:30 AM 1. **Call to Order**

7:30 AM 2. **Meetings and Minutes** 5 Minutes Chair
 • Vote to approve the regular session minutes of April 12, 2025 and April 29, 2025.

Upcoming Meetings:

Jun 11, 2025; Jul 9, 2025; Aug 13, 2025; Sep 10, 2025; Oct 8, 2025; Nov 12, 2025

7:35 AM 3. **Chair’s Update** 5 Minutes Chair Information

7:40 AM 4. **Director’s Update** 10 Minutes Director Information

7:50 AM 5. **SMUD Presentation Debrief** 15 Minutes Chair Discussion

Background: At the April 29, 2025 Light Board Meeting, staff from the Sacramento Municipal Utility District came to discuss their roll out of Time-of-Day rates as a case study.

Purpose: To allow Board members and staff to weigh in on lessons learned and key takeaways that could inform our rollout of Time-of-Use rates.

8:05 AM 6. **Time-of-Use Updates** 10 Minutes Director Info./Discussion

Background: Light Plant staff have been working on advancing elements of the Time-of-Use rate rollout plans.

Purpose: CMLP staff will review recent developments and seek Board feedback and direction.

8:15 AM 7. **Local Control Discussion** 10 Minutes Director Discussion/Vote

Background: Several other Light Boards have recently drafted and signed letters addressing state programs that have impacts to MLP territories.

Purpose: To review the programs and actions in other territories and allow the Light Board to discuss if any action is recommended.



CONCORD MUNICIPAL LIGHT PLANT

ELECTRIC | BROADBAND | ENERGY MANAGEMENT

- 8:25 AM 8. **Broadband Plans and future rates** 25 Minutes Dir./BB Mgr Info./Discussion
Background: Concord Broadband will soon have new equipment that will allow for faster speeds and higher density per fiber strand. With this new capability and in response to market pressures, we are anticipating a major change in our number of service tiers and pricing structure.
Purpose: To brief the Board and get feedback on the direction we move.
- 8:50 AM 9. **Power Supply Options** 10 Minutes Asst. Dir. Info./Discussion
Background: The Concord Municipal Light Plant secures about 80% of its power ahead of time through power supply contracts. Some new non-carbon-emitting projects are in their earliest stages, and we are being polled for our interest at this time.
Purpose: To brief the Board and get feedback on which projects, if any, they are interested in. This will be an open session discussion, so no specific cost amounts will be discussed
- 9:00 AM 9. **Liaison & Public Comments** 5 Minutes Chair Information
- 9:05 AM 10. **Adjourn**

Distribution: Select Board (1 copy)

Kerry Lafleur
Jan Aceti
Karlen Reed

Carole Hilton
Laura Scott
Eric Simms

Joe Repoff
Jeff Cosgrove

Nan Okarma
Cameron McKennitt

Join Zoom Meeting

<https://us02web.zoom.us/j/83853970051?pwd=akVzemJRQk8vNTJRUnNlOS9NNDFuQT09>

Meeting ID: 838 5397 0051

Passcode: 661712

One tap mobile

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+16469313860,,87335757488#,,,,*680327# US

Link to view recordings of previous Light Board Meetings:

<https://www.youtube.com/playlist?list=PL1TTzrWEKOOOn0RIJ2MdE2SnNZMWYeoeat>

Link to view the Director's Updates (also in meeting packets):

<https://concordma.gov/1106/Municipal-Light-Board>

Link to view the Broadband Monthly Updates:

<https://www.concordma.gov/3148/Monthly-Updates>

Concord Municipal Light Board Minutes April 9, 2025

Pursuant to a notice duly filed with the Town Clerk, a meeting of the Concord Municipal Light Board was held on Wednesday April 9, 2025, at 7:30am, via a Zoom meeting. Present were Board Members: Warren Leon (Chair), John Dalton, Bianca Taylor, Brian Foulds and Chris Schaffner. Also in attendance were Jason Bulger, CMLP Director; Carole Hilton, CMLP Customer Service Manager; Laura Scott, Assistant Director of Power Supply and Energy Management; Jan Aceti, Energy Efficiency & Electrification Coordinator; Pamela Cady, Energy Efficiency & Electrification Specialist; Karin Farrow, CMLP Office Administrator; Eric Simms, Director of Sustainability; Cameron McKennitt, Select Board liaison to the Light Board; and residents: Pamela Dritt, Andy Puchrik and Gilbert Metcalf (guest speaker).

Note definitions for acronyms used in these minutes:

- **CMLP:** Concord Municipal Light Plant
- **BB:** Broadband
- **COSS:** Cost of Service Study
- **CSS:** Customer Service Specialist
- **TOU:** Time of Use

CALL TO ORDER

Mr. Leon called the meeting to order at 7:32 AM. Meeting recording will be posted to the Minuteman Media YouTube page as soon as it is available.¹

MEETINGS & MINUTES

Mr. Dalton moved to approve the March 12, 2025 minutes as distributed. Mr. Schaffner seconded the motion and with all members in favor, the motion carried.

CHAIR'S UPDATE – presented by Warren Leon (1:38)

Mr. Leon made a recommendation to defer holding a public meeting on the power supply both because there are likely no other upcoming power supply contracts that would shift the balance of the portfolio and because this year's communications to customers should be focused on TOU rates to ensure clarity. Mr. Dalton and Mr. Foulds expressed agreement.

Mr. Leon let the audience know there will be a 2nd Light Board meeting in April on the 29th that will allow for a presentation from the Sacramento Municipal Utility District on their implementation of TOU rates.

Finally, Mr. Leon mentioned that a recent Federal executive order intends to revoke the states' climate and energy policy. He and Mr. Dalton feel there is relevance in monitoring for its impact on Concord.

DIRECTOR'S UPDATE – presented by the CMLP Director (7:12)

- There was an Arc flash in Belmont. We send our thoughts to those workers and with Belmont Light.
- We are hearing that many projects have been held up receiving Inflation Reduction Act dollars, which could have an impact on the various projects we have planned.
 - There are active court cases, and we have seen some dollars released from the EPA and DOE.

¹ Minuteman Media YouTube Link: <https://www.youtube.com/watch?v=eKEJUSFI2Q8>

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- We are excited for the Town's 250th celebration. Seventeen CMLP/BB staff members will be on site April 19th, and we have a planned response for any issues we could see.
- Canadian Energy Tariff updates are not affecting CMLP at this point; our web page has been updated to reflect the latest conditions.
- Green Home Tours were a success. Many people who visit these events do follow up and reach out to staff to learn more about the rebates and incentive programs we have.
- The annual heat pump count has been completed for 2024, and Concord added 164 new heat pumps, which represents almost 20% of the total number installed since we began tracking in 2012.
- Middle school solar site license update:
 - The CMLP Director had a great meeting last week with the Assistant Superintendent, and we think we've found the language we need to get this over the finish line.
 - We met with PLM on Monday to review the Landfill solar/battery project, and we met with Convergent last week and with MMWEC again this week with a site visit later today.
- We have a new Grade 3 Lineworker starting next week and we are also getting ready to make an offer to a Grade 2 Lineworker (which is higher than 3rd class).
- We have hired a Financial Manager after a long search, and she should be at our next Board meeting.
- Interviews continue for our Customer Service Specialist, and we have some great candidates for Network Engineer.
- Time of Use
 - We have selected a COSS consultant after an extensive review: Utility Financial Solutions
 - We are working on the Time-of-Use bill calculator
 - Carole is working on getting requirements to NISC for bill print changes
 - We have a second April Light Board meeting scheduled to discuss the Sacramento Municipal Utility District's Time-of-Day rates.
 - Staff are attending a 2-day APPA ratemaking seminar including Time-of-Use rates
 - We have signed up for the MMWEC Connected Homes program, which will completely manage some connected devices to reduce load during peaks.
- We are working with Public Works on the creation of their stormwater utility, which is going to be billed through CMLP's vendor, NISC.

Mr. Leon asked for updates on the battery storage project, and Mr. Bulger said he thought it could be a topic for discussion in May or June. Mr. Foulds asked whether CMLP was monitoring for low load this April, and CMLP staff responded they were. Mr. Schaffner asked what the concern was with low load, and Mr. Foulds explained Concord's solar saturation issues. Ms. Taylor asked if we might recommend customers turn off solar prior to them leaving for spring break. Staff will research.

BROADBAND UPDATE – presented by the CMLP Director (30:42)

- Broadband staff have been working to support the backbone for the new Advanced Metering Infrastructure.
- The team has done a great job supporting 250th efforts, including getting internet to the jumbotron and media trailer.
- Technicians and the Network Engineer have supported the Police Department's relocation of dispatch due to flooding earlier this year.

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- Dale, our Broadband Manager, is closely following the Residential Retrofit grant in the event Concord locations are named in the next round of funding.
- Staff and the CMLP Director are working on the dark fiber lease with the schools.

CMLP STAFF INTRODUCTION: ENERGY MANAGEMENT – presented by the Assistant Director of Power Supply and Energy Management (33:12)

Energy Management is the division at CMLP responsible for assisting customers manage their energy costs and reduce their carbon emissions through electrification, improved energy efficiency, and the generation of carbon-free solar power at homes and businesses. It is comprised of:

- Jan Aceti – Energy Efficiency & Electrification Coordinator
- Pamela Cady – Energy Efficiency & Electrification Specialist
- Kim Slack – Heating & Cooling Specialist
- Ethan Herberman – Heating & Cooling Specialist

Ms. Scott reviewed the rebates and coaching services that customers have access to in Concord before turning it over to Jan Aceti. Ms. Aceti reviewed a recent project that aims to document and present the heat pump adoption in Concord over time. Pamela Cady introduced herself and reviewed some of her primary duties, including interaction with customers, pre-approvals for solar and battery projects, and improving internal and public-facing programs. Ms. Cady works on reporting for internal and regulatory purposes.

Board members gave personal testimonials expressing their appreciation for staff and the work they do. They praised Concord's efforts in being a leader in terms of adoption and support of electrification. Mr. Leon asked how the future Time-of-Use rates might affect this team's efforts. Some technologies, like electric vehicles, will dovetail nicely. Others, like heat pumps, will be harder to use during off-peak times.

SOLAR POLICY REVISION - presented by the CMLP Director (48:55)

Mr. Bulger reported that CMLP's current net metering policy requires battery storage for new solar installations of 50kW or more, discouraging larger projects due to cost. Staff seeks Board feedback on modifying this to include curtailment as an option, as recommended by the Solar Task Force.

Concord's high behind-the-meter solar presents challenges. Solar intermittency complicates production forecasting and grid stability for ISO-New England. Locally, the lack of real-time monitoring (SCADA) increases the risk of excess solar power feeding back to the substation, potentially causing transformer trips.

The Town prioritizes in-town solar for its carbon-free nature and avoidance of capacity/transmission costs. CMLP is deploying a SCADA system (estimated completion in the first half of 2026) and pursuing a settlement mechanism to allow power export to Eversource.

The Solar Task Force urged exploring alternatives to the battery requirement. Curtailment, a low-cost automated device, limits or prevents power pushed back past the meter.

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Staff requests Board feedback on revising the net metering policy for systems over 50kW. They propose staff discretion to assess projects and recommend the most cost-effective strategy (aiming for curtailment where possible until system vulnerabilities are addressed) to maximize solar while ensuring grid safety. This would be applied consistently to all customers with internal procedures.

- Mr. Foulds recalls the 50KW threshold was a bit arbitrary but necessary to start. He felt it was a big barrier for residents with large arrays, which are uncommon. He suggested differentiating between residential and commercial entities. He offered a higher threshold (75-100KW) to avoid impacting most residents. He also raised concerns about relying on customer action for curtailment (addressed by the automatic device).
- Mr. Schaffner thought flexibility made sense and suggested requiring provisions in the wiring for future battery installation even if curtailment is used initially.
- Mr. Dalton agreed the flexibility makes good sense and found the 50KW threshold reasonable, noting he would be surprised if many residential customers reached this level.
- Ms. Taylor sought clarification on curtailment, confirming it involves a separate, automatic device for larger arrays that prevents net metering by limiting output to the customer's internal consumption.

The Board indicated comfort with allowing staff to take a more flexible approach, not strictly requiring batteries over 50KW, and resolving cases individually based on what makes sense for the specific project and location, aiming for curtailment where possible. No objections were raised.

This guidance is intended to allow larger projects (like a proposed 700KW project) to move forward, which might have been stalled by a strict battery requirement.

PEAK SHAVING TOOL EFFICACY - presented by the Asst. Dir. of Power Supply and Energy Management (1:04:50)

Background: To trim capacity costs levied by ISO New England (ISO-NE), CMLP employs a Google Group to notify customers on anticipated high-demand summer days, requesting voluntary electricity reduction during peak hours. These capacity costs hinge on a utility's contribution to the single highest peak hour across the ISO-NE region annually. While the per-kilowatt value of peak reduction has notably decreased to about \$3.70/kW-month in 2024, ISO-NE anticipates a resurgence in these costs.

Concord resident and notable Economist Gib Metcalf provided a detailed summary of his calculations and factors in determining that Peak Shaving over the past several years has resulted in cost savings.

Intrigued by the efficacy of this peak alert program, Mr. Metcalf sought to understand its impact on demand and capacity charges levied. Leveraging granular hourly load data (June-Sept 2009-2024), peak alert records, solar and weather data, alongside ISO-NE figures, an econometric approach was deployed. To navigate the inherent challenge of alerts coinciding with predicted high demand, the day-ahead peak load forecast from ISO-NE served as a clever instrumental variable.

The analysis suggests that the peak alert program yields a load reduction of approximately 0.7 megawatts during

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an alert hour, representing about a 2% dip from the average summer peak. Zooming in, this implies a more significant residential load reduction of roughly 4-5%, given that residential consumption constitutes about 40% of the total. It's worth noting that the study couldn't isolate the impact of other concurrent CMLP initiatives. Quantifying the program's benefits, the 0.7 MW peak reduction translated to capacity cost savings ranging from around \$185,000 in 2018 down to approximately \$32,000 last year, contingent on the annual peak aligning with an alert hour. Impressively, Ms. Scott's peak predictions proved accurate in 5 out of 7 years studied. Factoring in this prediction accuracy, the program's expected value last year hovered around \$22,600.

Beyond capacity savings, the program offers additional perks. Estimated avoided energy costs reach about \$1,200 per summer (an upper bound assuming true reduction), and the social savings from reduced pollution during peak demand periods are estimated at roughly \$1,000. These other savings totaling around \$2,200, while significant, pale in comparison to the potential capacity cost savings. Nevertheless, the program is deemed very cost-effective considering its minimal overhead (Google alerts and some staff time).

A brief aside on solar production revealed an estimated summertime capacity factor of 22-26% in Concord, indicating that load slightly trails total demand.

The study acknowledges a limitation: the relatively few peak alert days make precise estimations more challenging. Looking ahead, the deployment of smart meters promises an exponential increase in the granularity of future analyses. Future research should delve into the behavioral impacts of Time-of-Use (TOU) rates and the program's effectiveness under such rate structures. Furthermore, exploring the potential of critical peak pricing, which would introduce a financial incentive for responding to alerts, warrants consideration. Finally, a more nuanced analysis of energy savings, perhaps framed in megawatt hours and carefully considering load shifting versus reduction, could yield even more insightful results.

Board members expressed appreciation for the level of analysis and asked a few follow-up questions about the penetration of the list used and the implications of capacity price drops impacting the planned large battery project. Mr. Foulds wondered how the new time-of-use rates might impact CMLP's capacity and transmission costs and hopes we redo the analysis then.

LIAISON AND PUBLIC COMMENTS (1:41:11)

Pamela Dritt offered a preference for a lower rate for heat pumps to increase adoption. She echoed offering an incentive for battery installation, including coaching. She also sought town investment in electric school buses.

ADJOURN

Mr. Schaffner moved to adjourn, Mr. Foulds provided the second and with a unanimous vote, the meeting was adjourned at 9:16 AM.

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Pursuant to a notice duly filed with the Town Clerk, a meeting of the Concord Municipal Light Board was held on Tuesday April 29, 2025, at 1:00pm, via a Zoom meeting. Present were Board Members: Warren Leon (Chair), John Dalton, Bianca Taylor, Brian Foulds and Chris Schaffner. Also in attendance were Jason Bulger, CMLP Director; Carole Hilton, Customer Service Manager; Laura Scott, Assistant Director of Power Supply and Energy Management; Nan Okarma, Financial Manager; Donna De Gray, Customer Service Supervisor; Ann Breitenwischer, Meter Supervisor; Karin Farrow, Office Administrator; Eric Simms, Director of Sustainability; Karlen Reed, Finance Committee Liaison to the Light Board; and staff from the Sacramento Municipal Utility District, including Alcides Hernandez and Karen McCord.

Note definitions for acronyms used in these minutes:

- **CMLP:** Concord Municipal Light Plant
- **SMUD:** Sacramento Municipal Utility District
- **COSS:** Cost of Service Study
- **TOD:** Time of Day
- **TOU:** Time of Use

CALL TO ORDER

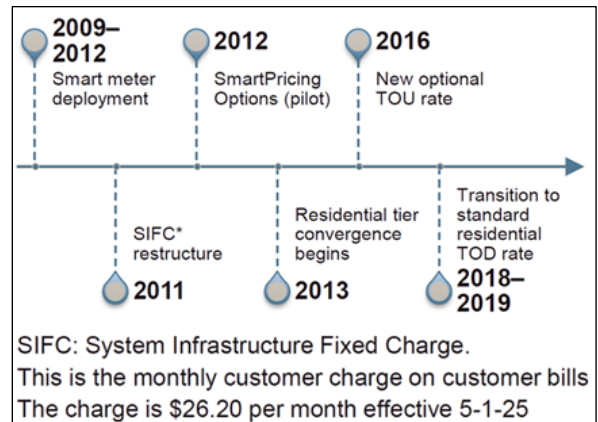
Mr. Leon called the meeting to order at 1:01 PM. Meeting recording will be posted to the Minuteman Media YouTube page as soon as it is available.¹

Time of Use Presentation – presented by Alcides Hernandez (1:16)

The Sacramento Municipal Utility District (SMUD) is the 6th largest community-owned in the country with 645,000 customers, and one that has recently moved to time-of-use rates, which they call “Time of Day” (TOD).

Alcides Hernandez (Revenue Strategy Manager) and Karen McCord (Marketing Lead) presented their experience with implementing TOD rates. The presentation included 28 slides and covered the full lifecycle of SMUD’s rate transition.

Mr. Hernandez and Ms. McCord described how SMUD began laying the groundwork for TOD rates as early as 2011 and was made possible by their smart meter deployment. They noted organizational restructuring efforts and the establishment of a cross-functional team to manage rate design, billing system readiness, and regulatory compliance.



The team walked the participants through the evolution of SMUD’s rate structures, including tiered and flat

¹ Minuteman Media YouTube Link: <https://www.youtube.com/watch?v=PT9bUXPHX3I>

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rates that transitioned to Time of Day (which was chosen over “Time of Use” after research and focus group feedback). They explained how time blocks were selected (peak, off-peak, and mid-peak), how seasonal variations were handled, and the rate differentials customers would experience. Their focus groups also recommended a short peak window, which is what led them to the 5-8pm peak period in the summer. Significant attention was paid to modeling customer impact to

ensure equitable outcomes and to develop a structure that incentivized behavior change without causing financial distress.

The data presented showed that the TOD rates have exceeded initial expectations in terms of predicted carbon reduction and financial benefit, which was 11.5k tonnes and \$11M respectively in 2021. The peak load has reduced on average 8%.

Ms. McCord emphasized the role of customer education in the success of TOD rates. SMUD launched a comprehensive, multi-year marketing campaign that included bill inserts, community presentations, social media, paid advertisements, and targeted outreach to vulnerable customer segments. They developed materials that explained why TOD rates were being introduced and how customers could adapt. Tools such as an online bill comparison calculator helped customers estimate the impact of TOD rates on their bills.

SMUD phased in the new rates over several years, beginning with optional enrollment and culminating in mandatory adoption. This transition was supported with ample notice, pilot groups, and multiple touchpoints to ensure customer understanding. Participants were shown a timeline and rollout strategy that included internal testing, soft launches, and full deployment milestones.

Lessons learned

Robust marketing, communications, education and outreach. Provide customers with tools and information to help them make informed choices.	Over 10-year journey with many customer-facing and back-office changes over that period.	Creating “test drive” opportunities for staff and obtaining feedback ahead of mass rollout.
Explore pilot first to test rate design concepts, systems, use study results in final rate design. Consider simplicity over complexity.	Added in-person Cust. Service Rep. (CSR) tailgates during rollout – allowed for more fluid conversations and opportunities with CSR’s to resolve issues quicker.	Best customer experience possible through journey maps to help identify risks and opportunities for rate adoption and operational impacts.

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Tools like online calculators were displayed for reference along with testimonial videos showing customers who found ways to save with the TOD program. SMUD realigned their graphics to go from noon to noon

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instead of midnight to midnight after getting customer feedback. They summarized lessons learned, discussed critical peaks, which they announce sparsely, as well as the journey maps to walk through the customer experience to see what can be learned to help improve the program.

Throughout the meeting, Board members or staff asked questions:

- Mr. Foulds asked if they have seen load growth since the rollout of TOD, and Mr. Hernandez responded that even with population growth and electrification, they are seeing flat load due to the state's aggressive energy efficiency programs and solar adoption. A follow-up question was asked about how SMUD handles net metering, and Mr. Hernandez explained that it is handled at the state level with different iterations of the Net Energy Metering policies.
- Mr. Bulger asked how they handled billing cycles that might not result in clean divisions for TOD season start or end dates. Mr. Hernandez responded that initial billing started at the beginning of a period to prevent proration. Once they were off the ground going, customers do see multiple periods on the same bill and don't seem confused.
- Mr. Dalton asked about the duration of the peak period. Mr. Hernandez responded that it was their focus groups and a desire to keep the rates simple that determined the duration and timing. For example, he acknowledged that there is a small peak in the mornings during winter, but they felt it was not worth splitting out a separate rate there because the differential was not great enough to warrant any possible confusion on customers' part.
- Mr. Leon asked if SMUD envisioned changing the peak hours if they were seeing costs and broader system demands starting to shift. Mr. Hernandez mentioned that they knew they would need to reconsider after they were operational with TOD rates for several years. They have to balance the need for greater accuracy with the need to re-educate the public.

Following the SMUD presentation, Concord Light Board members Mr. Foulds and Mr. Leon thanked the staff for their time and willingness to share their experiences.

ADJOURN

Mr. Foulds moved to adjourn, Ms. Taylor provided the second and with a unanimous vote, the meeting was adjourned at 2:05 PM.

Concord Municipal Light Plant Updates

May 14, 2025

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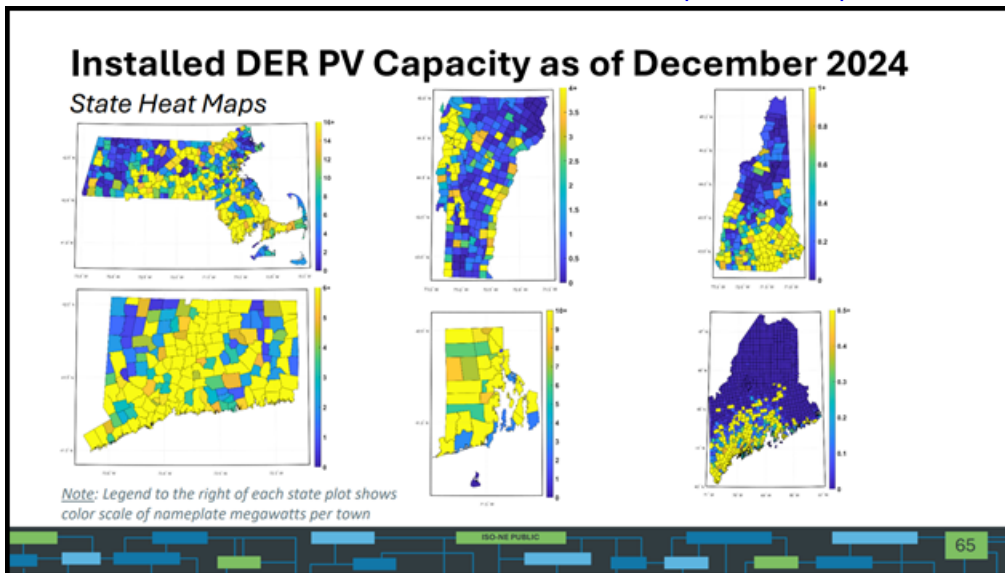
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Organization and Industry

- Lobbyists and energy insiders are watching the climate- or utility-related bills that have been announced by the Massachusetts Legislature.
- ISO New England is proposing significant changes to its Forward Capacity Market, aiming to transition from an annual to a prompt, seasonal market structure. This shift is intended to better align with the evolving resource mix and enhance system reliability. Learn more here: https://www.iso-ne.com/static-assets/documents/100023/car_proposal_information_summary_5.5.25.pdf
- The Federal Energy Regulatory Commission (FERC) continues its work on modernizing wholesale electricity market design. In April 2025, [FERC directed the operators of six regional organized electric power markets](#) to provide information regarding their changing system needs and plans for potential reforms. This initiative aims to ensure that the markets provide appropriate incentives for resources with the operational capabilities needed by market operators and to facilitate the integration of new and emerging technologies. FERC is seeking comprehensive reports from these market operators addressing current system needs, expectations for the next 5-10 years, and any planned market reforms.
- Around mid-March 2025, the Environmental Protection Agency (EPA) [announced its intention](#) to reconsider several environmental regulations impacting the power sector. This includes a review of the 2024 rule that set carbon dioxide emission standards for coal-fired and new gas-fired power plants operating beyond 2039, requiring them to meet standards

equivalent to 90% efficient carbon capture and storage by 2032. The EPA also indicated it would reconsider water pollution limits for coal-burning power plants issued in 2024 and potentially the Greenhouse Gas Reporting Program.¹ These actions are framed as part of a broader effort to reduce regulatory burdens and potentially shift away from certain clean energy initiatives.

- In mid-April, the Massachusetts Department of Environmental Protection (MassDEP) [announced enforcement discretion](#) for manufacturers that are unable to meet minimum electric truck sales required under the Advanced Clean Trucks (ACT) program. Manufacturers that cannot meet those sales requirements will receive relief for Model Years 2025 and 2026, provided they make internal combustion engine (ICE) trucks available to distributors seeking them. This approach gives manufacturers more flexibility and eases the challenges dealers are facing, while keeping the state on track to achieve critically important emissions reductions.
- We continue to work with the Concord Public Works department on their creation of a stormwater utility and to move the curbside billing to NISC.
- The ISO New England published its final solar forecast for 2025 here: https://www.iso-ne.com/static-assets/documents/100022/2025_final_pv_forecast.pdf



Energy Management

- The Energy Management Division has completed an update of its heat pump rebate program. A number of policy and procedural changes were considered, and the following were implemented:
 - An option was added to the heat pump rebate application allowing customers to instruct CMLP to pay the rebate directly to their installer. This results in lower upfront

out-of-pocket costs for customers whose installers are willing to deduct the rebate from the amount the customer owes them.

- A final HERS rating report is allowed as a substitute for a home energy assessment when the building code requires a HERS rating for projects that involve both a renovation and a heat pump installation. The requirement that a home undergoing renovation meets a particular HERS rating ensures that weatherization measures are implemented.
 - Rebates for replacements of aged ground source heat pump equipment are now capped at \$10,000, rather than \$15,000, when existing geothermal wells are reused.
 - The post-installation quality assurance form that installers had been asked to fill out in the past has been merged with the rebate application. This change eliminates redundant questions that have appeared in both forms and reduces confusion about the submittals required in order to receive a rebate.
-
- With the help of the GIS staff, Energy Management staff has created a [Heat Pump StoryMap](#) to show the community our progress on heat pump adoption in Concord. The StoryMap shows how heat pump adoption has changed over time and also provides our customers with answers to some common questions about heat pumps, such as how've they've worked out for others in Concord. Links to the StoryMap are now available on our [Heat Pumps for Heating and Cooling](#) webpage and in the "Explore More Topics" section of our [Heat Pump Rebates for Your Home](#) webpage. We plan to feature the StoryMap in an e-newsletter to be sent to our customers in late May.
 - We sent a targeted email promoting CMLP's heating/cooling coaching service to 354 solar customers who have not yet adopted heat pumps. Concordians who've installed solar panels on their property often do so because reducing carbon emissions is important to them. We wanted to reach out directly to these customers about the coaching service, which is available to help them slash their carbon footprint by choosing heat pumps for their next source of heating and cooling.
 - Energy Efficiency & Electrification Specialist Pamela Cady has drafted sample wiring and site plan diagrams for solar + battery projects. Once approved by the Engineering Division, they will be posted on our solar rebate webpage to show installers the basic information that we need them to include in these diagrams. We hope to reduce the number of times that we have to request updated drawings from installers due to common errors and omissions.
 - Energy Management staff helped prepare for the launch of the Connected Homes Program by meeting with MMWEC staff to explain how they can use our heat pump tally and rebate tracking spreadsheets to validate the presence of electrically powered heating and cooling equipment that customers wish to enroll in the program.

Battery Storage and Solar Project Updates

- The CMLP Director will be attending the School Committee meeting on Tuesday, May 13, 2025, with the intention of supporting the request for the site license to install the battery.
- A potential storage developer visited the Landfill site and provided a proposal.
- We have executed an NDA with another potential storage developer. We can now provide them with load data prior to getting an estimate.

Advanced Metering Project Updates

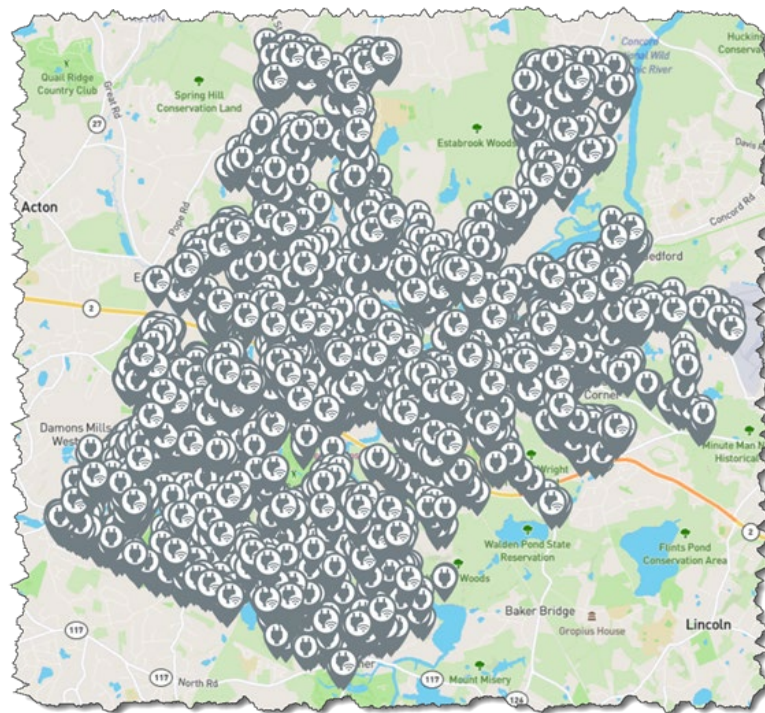
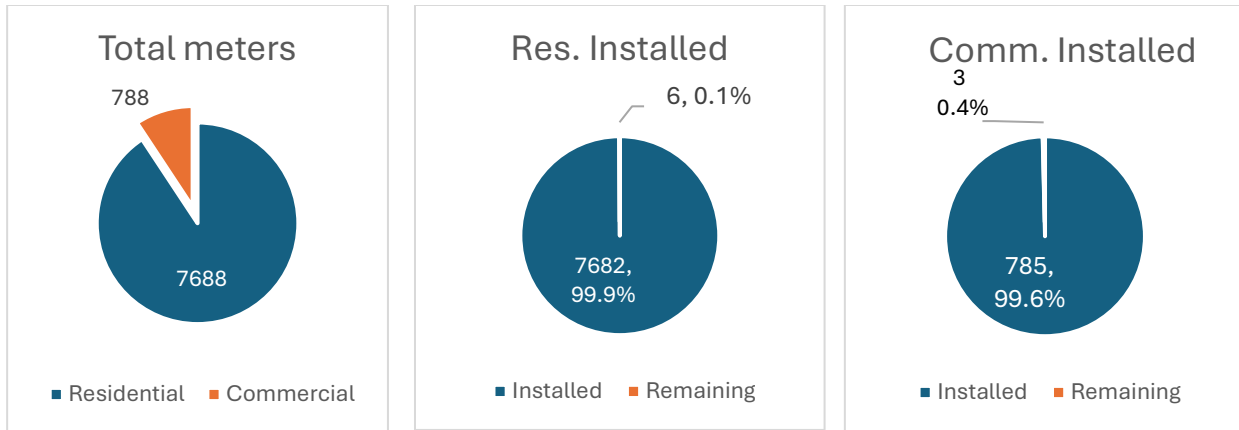


Figure 1: April 2025 Meters

- Metering has 9 meters left to install; 6 residential, 2 of which are opt out, and 3 commercial meters. All these meters are special circumstance installations such as trees and brush need to be cut back by customer to give access to meters or power needs to be shut off at the street to change the meter.
- Eaton will provide on-site user training and system tuning during the week of June 9. They will conduct a final network analysis and work to ensure we have guaranteed levels of meter reporting.



Engineering and Operations

- The Engineering, Procurement and Line crews spent time fulfilling Cost of Service Study requests.
- Teams continue to support conversations surrounding
- A member of the Engineering team attended a 3-day underground utility class from the APPA in early May.
- A member of the Engineering team is attending NISC AppSuite training hosted by the Vermont Electric Cooperative in June of this year.
- Equipment has been serviced or replaced in the Light Plant, including a toilet, a cracked skylight, and a broken ice machine.

Power Supply

- The Connected Homes program is to commence on 6/1/2025. The first advertisement about the program is to go out with May 20th bills.
- We have reached out to other APPA utilities to see who they use for their external audits. After 12 utility responses, spanning the US, we sought more local examples. Fortunately, one of the responding utilities was MMWEC who told me who 24 MA utilities use. By far, the most used firm by the Massachusetts utilities is Goulet, Salvidio & Associates, P.C. out of Worcester. The next most used is Baker Tilly; followed by CBiz, and Meyers Brothers Kalicka out of Western Mass. (used by Westfield and Chicopee).
- We have changed the High Bill Complaint procedure to more thoroughly involve the heat pump coaches when the complaint involves a heat pump.
- Regarding the Cost-of-Service study, we responded to 24 data requests from UFS.
- Power Supply facilitated the SMUD presentation to the Light Board in late April.

- Concord Light has executed its last purchase of 2024 vintage RECs to close out the year with 100% of renewable power.
- Contacted Runestone Electric and Great River Energy about their Demand-Side Management (DSM) programs and set up a call for 5/16/25. This inquiry was born out of Mr. Leon's quest to determine whether it made sense to encourage residents to purchase timers for their electric hot water heaters, so that they can avoid heating their water heater tanks during on-peak hours.
- Laura participated in a panel to select PURMA's next wealth advisor, which included reading RFPs, attending presentations and deliberation sessions.
- Attended an Employment Practices Liability Insurance (EPLI) webinar by Nixon Peabody.

Customer Service / Metering

- We have extended an offer to a candidate for the vacant Customer Services Specialist position and are waiting for the background checks to be completed. Donna De Gray, Customer Service Supervisor, is covering for the open CSS position until the position can be filled.
- As a result of the open position, the Customer Service team had to postpone the four-month project with NISC to migrate to Cloud-based iVUE Connect Service for most of our database usage. The Customer Services Specialists have completed most of the required training to be ready for when this project is picked up again in later this month or early June.
- We have completed a few rounds of disconnects since April 15, 2025. While we start with a large list of customers with past-due accounts a few days prior to disconnection (up to 29 accounts in one case), we have only had to disconnect 2 customers. We find delivering door hangers 24 hours prior to disconnection to be very effective in reminding customers to pay or to contact us if they need assistance.



April 2025 – Broadband Updates

Concord Broadband is pleased to share the following updates and information from the past month. Please do not hesitate to contact us at broadband@concordma.gov should you have any questions, concerns, or feedback.

Operations

The Broadband Manager and Light Plant Director have selected a finalist for the second Network Engineer position, and that candidate is going through routine background checks and screening. We hope to announce a start date in the very near future.

With the warmer weather and the 250th celebration behind us, the team is excited to get back to pulling more fiber for customer installs. We have seen an uptick toward the end of April and early May in the number of new customers

The Network team has installed new Wi-Fi access points around town, including some outdoor access points that have become very popular with the warm weather. Next time you're in the common area outside of the main library, check to see if you can see the Town of Concord's guest network!

Managed Wi-Fi services

Customers often ask our Broadband installers about getting solid Wi-Fi to all areas of their homes, but staff are limited in what kind of work they can do and what kind of equipment we offer. Calix, the vendor who makes our Broadband equipment, has new lines of faster Wi-Fi 6 and Wi-Fi 7 routers and access points that allow for a reliable and low-cost solution that includes wired or wireless mesh option. Concord Broadband has procured some of these devices and are conducting testing with the hope of offering them very soon to our customers.

A mesh Wi-Fi system uses multiple devices, called nodes or satellites, that work together to blanket your whole home in strong, reliable Wi-Fi. Instead of relying on a single router to do all the work, these mesh devices share the load and pass the signal between each other to reach every corner of your house. What makes it even better is the 6GHz backhaul—a dedicated, high-speed connection between the mesh units that keeps your devices fast and responsive, even when everyone's online at the same time. You get smoother streaming, quicker downloads, and fewer dead zones—all without needing to run any wires or adjust settings.

Upcoming Maintenance

At 4am on May 13, the Network team is doing non-service-impacting maintenance on one of our ISP links to begin the process of moving to new equipment.

Learn more on our maintenance page here:

<https://concordma.gov/3144/Broadband-Maintenance>

In addition to these technical benefits, the devices also allow for internet security services, parental controls and management of the devices in your home. We are excited about all these offerings and what is to come!

Why Symmetrical Service is Superior

Is your internet keeping up with your life? As more of us stream, work, learn, and connect from home, the demand for high-speed, reliable internet has never been greater. If you're wondering whether it's time to upgrade your service—or switch to symmetrical fiber—here's why the answer might be yes.

Faster speeds mean less waiting and more doing. Whether you're downloading large files, hopping on video calls, or gaming online, higher internet speeds ensure a smoother, more responsive experience. Think buffer-free streaming, lag-free gaming, and crystal-clear Zoom meetings—even when the whole household is online at once.

With symmetrical fiber internet, your upload and download speeds are the same. That's a big deal in today's world. Uploading a video, backing up photos to the cloud, or sending large work files becomes quick and painless. If you work from home, share content, or have a smart home setup, symmetrical speeds help everything run better.

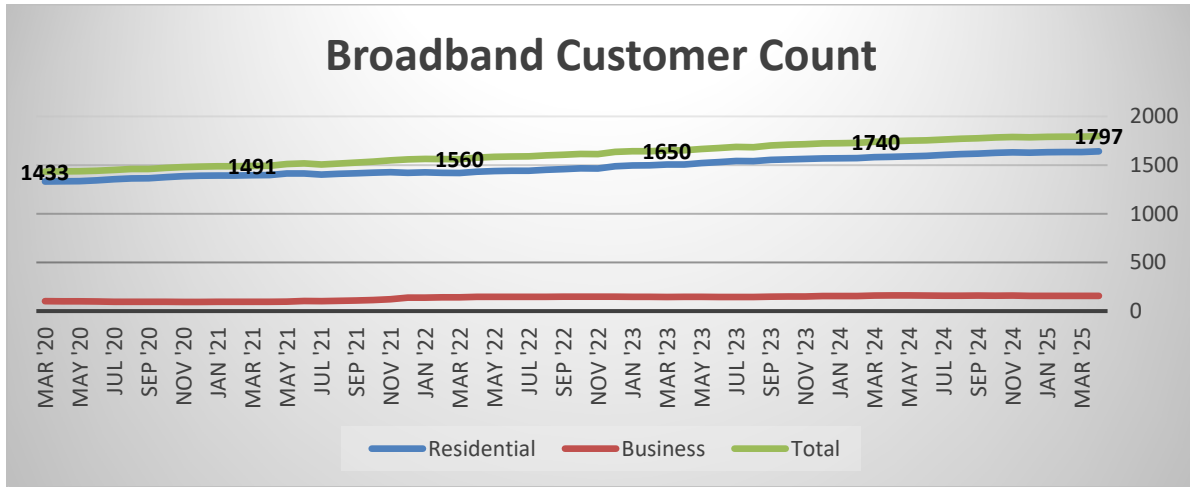
As smart TVs, voice assistants, home security systems, and dozens of devices become standard in modern homes, fiber gives you the bandwidth to keep everything running without slowdowns. Symmetrical fiber is designed to handle the demands of a connected household—today and in the future.

Fiber-optic networks are less affected by interference and congestion than traditional copper or coaxial lines. That means more consistent performance, especially during peak usage times. Fiber is also inherently more secure, helping keep your data safe.

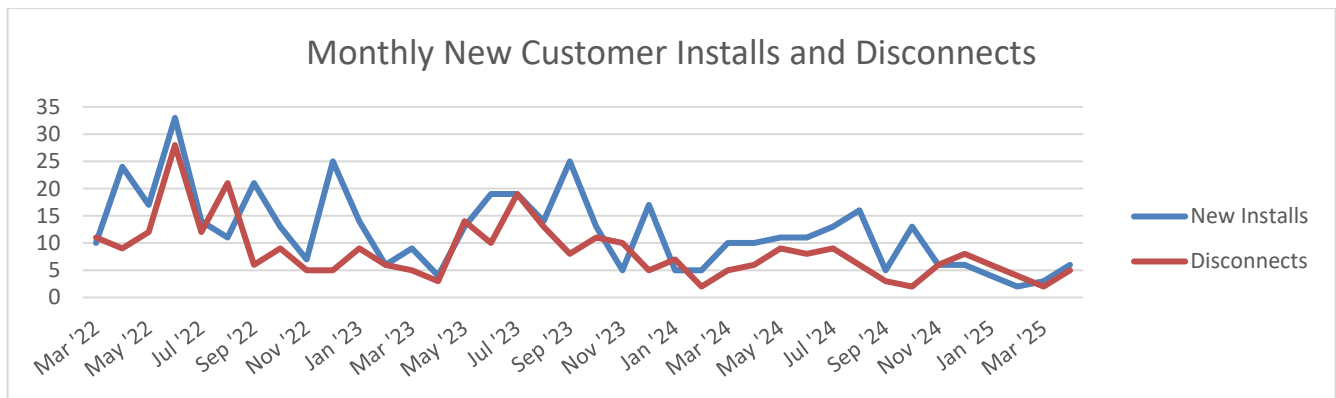
Upgrading now isn't just about today—it's about preparing for tomorrow. With technologies like 4K/8K streaming, virtual reality, and telehealth growing fast, fiber ensures your home is ready for whatever comes next.

Visit <https://concordma.gov/broadband> to learn more or call us at (978) 318-3101.

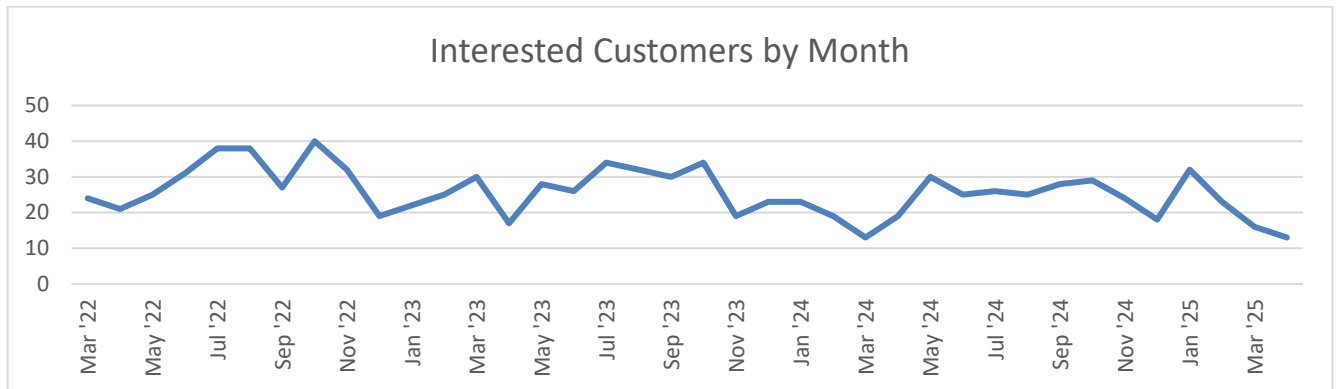
Monthly Metrics and Business Data



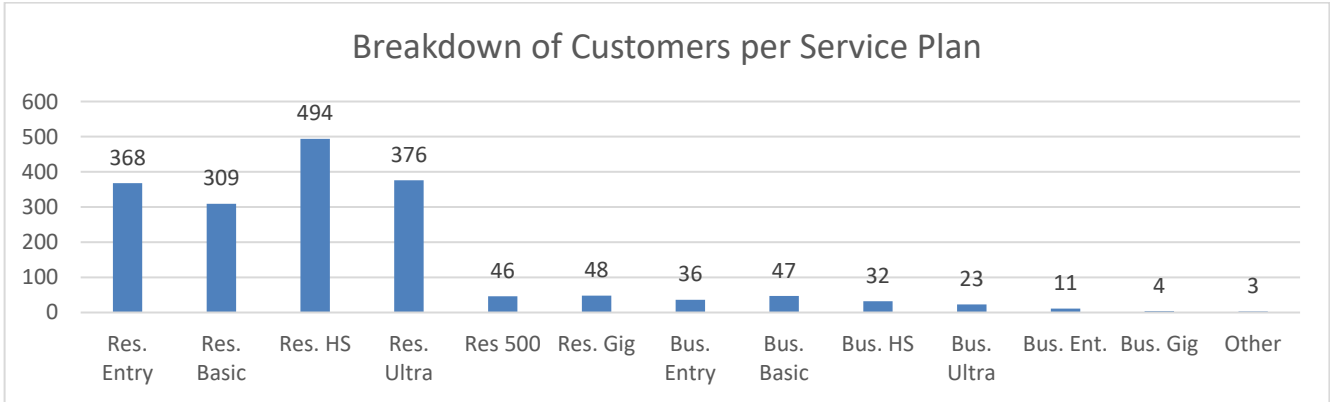
(Customer count: March 2020 – April 2025)



(The number of new installations and disconnects completed each month.)

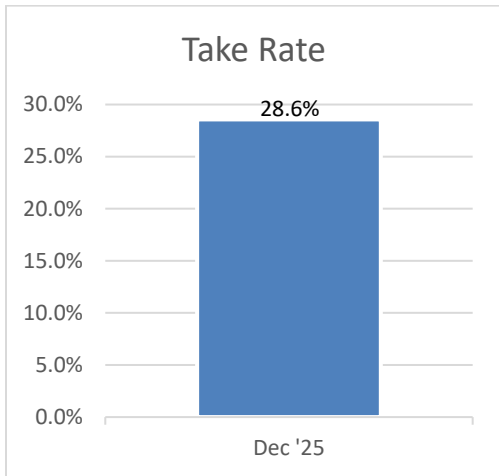
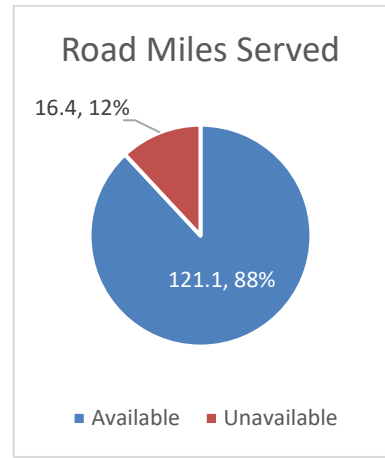
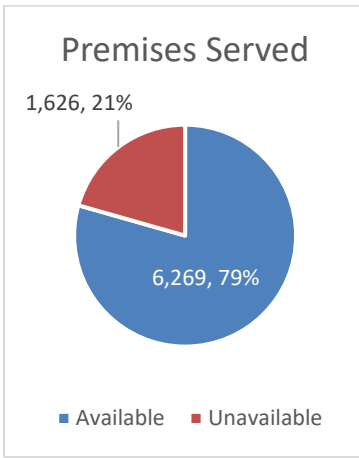
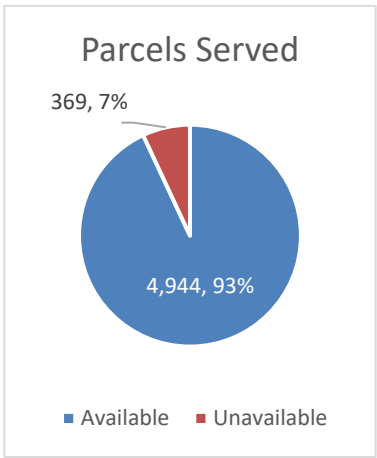


(This is the number of individuals who submit the Broadband interest form, whether they are in the current service area or not.)



(This is the number of each customer on our different service plans as of 4/30/2025.)

Other Metrics



(As of 2/15/2025)

Appendix

Fiber Broadband Completion Task Force's Report Goals

Goal	Type	Priority	Responsible Party	Additional Info.
Policies (p.39)				
• Universal Access	Policy	Highest	Select Board/Town Meeting	
• Expansion outside current territory	Policy	Low	Select Board/Town Meeting	Conversations happening
• Support Economic Vitality, Sustainability, Equity & Inclusion	Policy	High	Select Board/Light Board/TM Economic Development	Rate subsidy planned
• Affordable Housing	Policy	Medium	Select Board/Housing Groups	Rate subsidy planned; working on Concord Housing Authority properties
• Public Safety	Policy	Medium	Select Board/Town Manager	
• Education	Policy	Medium	Select Board/School Dept.	
• Government Access (PEG)	Policy	Medium	Select Board/PAAC	
Recommended metrics for tracking (p.41)				
• Parcels served	Metric	Medium	Town Staff/Light Board	Complete; will report quarterly
• Premises served	Metric	Medium	Town Staff/Light Board	Complete; will report quarterly
• Road miles served	Metric	Medium	Town Staff/Light Board	Complete; will report quarterly
• Subscribers	Metric	High	Town Staff/Light Board	Complete; will report monthly
• Take rate	Metric	Medium	Town Staff/Light Board	Complete; will report quarterly
• Churn	Metric	High	Town Staff/Light Board	Complete; included in monthly report
• Installations	Metric	Highest	Town Staff/Light Board	Complete; will report monthly
Governance (p.39)				
• Track progress against completion	Metric	Highest	Light Board/Town Staff	Working on this
• Rate of return policy	Policy	High	Light Board/Town Staff	Working on this
• Financial goals with regular reporting	Policy	High	Light Board/FinCom	Working on this
• Retained earnings and reserve policy	Policy	High	Light Board/FinCom	Working on this

Goal	Type	Priority	Responsible Party	Additional Info.
Strategic Planning Goals (p.43)				
• Marketing and growth	Metric	High	Light Board/Town Staff	Working on this
• Business return	Policy	High	Light Board/Town Staff	Working on this
Budgeting Process for Fiber Expansion (p.41)				
• Expand to fill existing opportunities	Planning	High	Light Board/Town Staff	
• External funding sources	Research	Medium	Light Board/Town Staff	Working on this
• ARPA Relief Funds Allocation, incl. Lost Revenue	Finance	Highest	Select Board/Town Manager	Complete
• Review/Confirm Internal Loan Findings	Finance	Highest	Financial Audit Comm/Staff	Complete
• Review and Rescind PILOF to MMN	Finance	High	Select Board/Town Manager	Complete
Capital Planning Process (p.42)				
• Review/Revise Debt financing schedule	Policy	Highest	Light Board/Town Staff	In progress; due to positive financial situation, anticipating being able to repay faster.
• Quantifying cost of expansion	Planning	Medium	Town Staff	Working on this
• How to fund expansion	Planning	Medium	Light Board/Town Staff	Working on this
• Revise/refine methods for computing ROI	Planning	Medium	Light Board/Town Staff	Working on this
Construction and Logistics (p.42)				
• Vibratory plow – direct buried fiber cables	Operations	Medium	Town Staff	Working on this
• Revise/Refine Communication conduit construction standards and guidance	Policy	Medium	Town Staff	Working on this
• Integrate Fiber construction with the Roads Program – focus on Streets without fiber that already have underground electric	Planning	High	Town Staff	Working on this



Account #	Service Address	Balance Forward	Current Charges	Total Due
1234567	123 OAK TREE LANE	\$0.00	\$174.31	\$174.31
1234566	123 OAK TREE LANE	\$0.00	\$26.00	\$26.00
Total:		\$0.00	\$200.31	\$200.31

KEEP Please do not staple payment.

SEND

Mailing Address or Phone Number Changes Please call us for all other service change requests.

Permanent Temporary (from ___/___/___ to ___/___/___)

Mailing Address _____

City _____ State _____ Zip _____

Email _____

Home Phone _____ Cell Phone _____

Comments

Other Ways to Pay Your Bill



Online
 Pay your bill at
<https://concord.smarthub.coop>



Phone
 Call 855-939-3551
 to pay by phone



Mobile App
 Download the
 SmartHub app
 on iTunes or Google Play Store



In Person
CMLP
 1175 Elm Street
 Concord MA 01742

Unable to Pay Your Bill?

If you cannot pay your entire bill by the due date, please call us immediately. A Customer Service Representative may be able to help you with a payment arrangement to suit your needs. For additional State assistance refer to DPU website:

<https://www.mass.gov/info-details/help-paying-your-utility-bill>



TOWN OF CONCORD MUNICIPAL UTILITIES

ELECTRIC | WATER | SEWER | TELECOMMUNICATIONS



- PAY YOUR BILL
- MONITOR USAGE
- REPORT AN OUTAGE

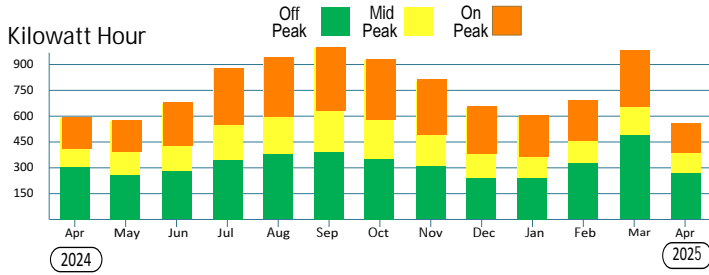
Service Activity: 123 OAK TREE LANE

Account: 1234567

Electric

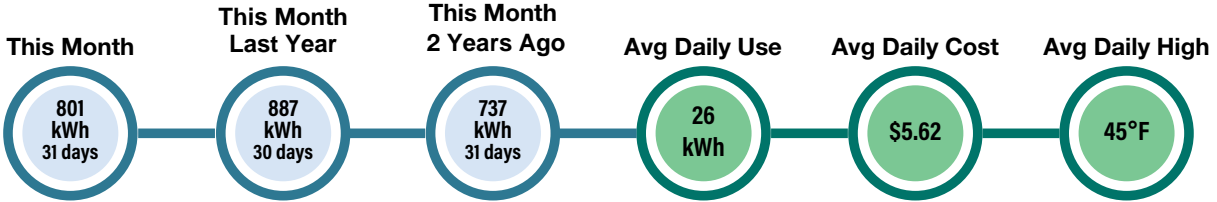
Description: ELE

Meter #	Rate Schedule	Services		Days	Readings		Meter Multiplier	kWh Usage
		From	To		Previous	Present		
123456789	ON PEAK	03/01/2025	04/01/2025	31	945	1111	1.0	166
123456789	MID PEAK	03/01/2025	04/01/2025	31	1986	2231	1.0	245
123456789	OFF PEAK	03/01/2025	04/01/2025	31	3463	4211	1.0	748



Power Cost Factor	1159 kWh @ -0.004	-\$3.20
Service Charge		\$20.00
Underground Surcharge		\$4.00
Peak	166 kWh @ 0.35439	\$58.83
Mid-Peak	245 kWh @ 0.15439	\$37.83
Off-Peak	748 kWh @ 0.10759	\$80.48
Distribution Charge	1159 kWh @ 0.06561	\$76.04
NYPA Power Cost Adjustment	75 kWh @ -0.025	-\$1.88
	726 kWh @ 0.00	\$0.00
Electric Service Subtotal		\$270.66

Energy Usage Comparison



Right to Dispute your Electric Bill

Call us if you believe your bill is not correct and wish to dispute all or part of it. We will research your inquiry. If you are not satisfied with the results or the payment arrangement we offer on the overdue part of your bill, you can appeal in writing or by phone to the DPU Consumer Complaints division; DPUConsumer.Complaints@state.ma.us. The Consumer Division of the Department of Public Utilities (DPU) assists consumers with their utility companies through dispute resolution, evaluation of regulatory compliance and customer service, and education.

Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110
(T) 877-886-5066 (toll free) or 617-737-2836

Total Current Charges: 123 OAK TREE LANE

\$174.31





TOWN OF CONCORD MUNICIPAL UTILITIES

ELECTRIC | WATER | SEWER | TELECOMMUNICATIONS



- PAY YOUR BILL
- MONITOR USAGE
- REPORT AN OUTAGE

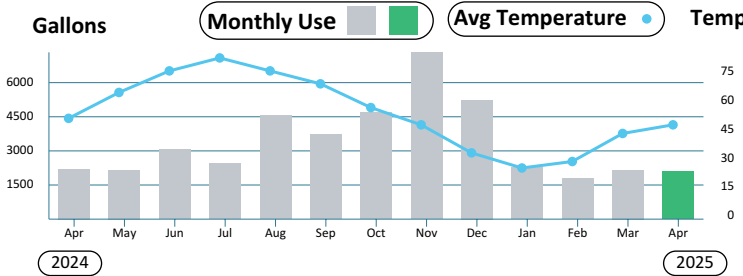
Service Activity: 123 OAK TREE LANE

Account: 1234566

Water

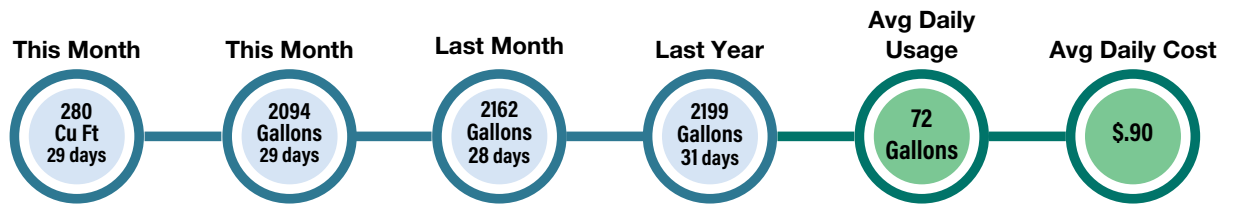
Description: Water Irrigation

Meter #	Rate Schedule	Services From	To	Days	Readings Previous	Present	Meter Multiplier	Water Usage (Cu Ft)
123456789	RES	03/03/2025	04/01/2025	29	53443	53723	1.0	280



Meter Fee		\$2.00
Usage Charge	280 cf @ 0.0857	\$24.00
Water Service Subtotal		\$26.00

Water Usage Comparison



Note: 1 Cu Ft = 7.48 Gallons

Total Current Charges: 123 OAK TREE LANE

\$26.00



LOCAL CONTROL LETTERS

MAY 2025



WHAT IS THIS ISSUE?

- Recent state initiatives seek to expand programs beyond Investor-Owned-Utility (IOU) territory into Municipal Light Plant (MLP) territory.
- They include:
 - Large Building Energy Reporting
 - Clean Heat Standard
 - Advanced Clean Trucks regulation
 - Decarbonization Clearinghouse

WHAT IS THE CONCERN?



MLPs vastly outdo the IOUs in terms of greenhouse gas emission reduction, reliability and low rates.



Some of these requirements are onerous and will be difficult for small organizations to adopt without a large impact on rates.



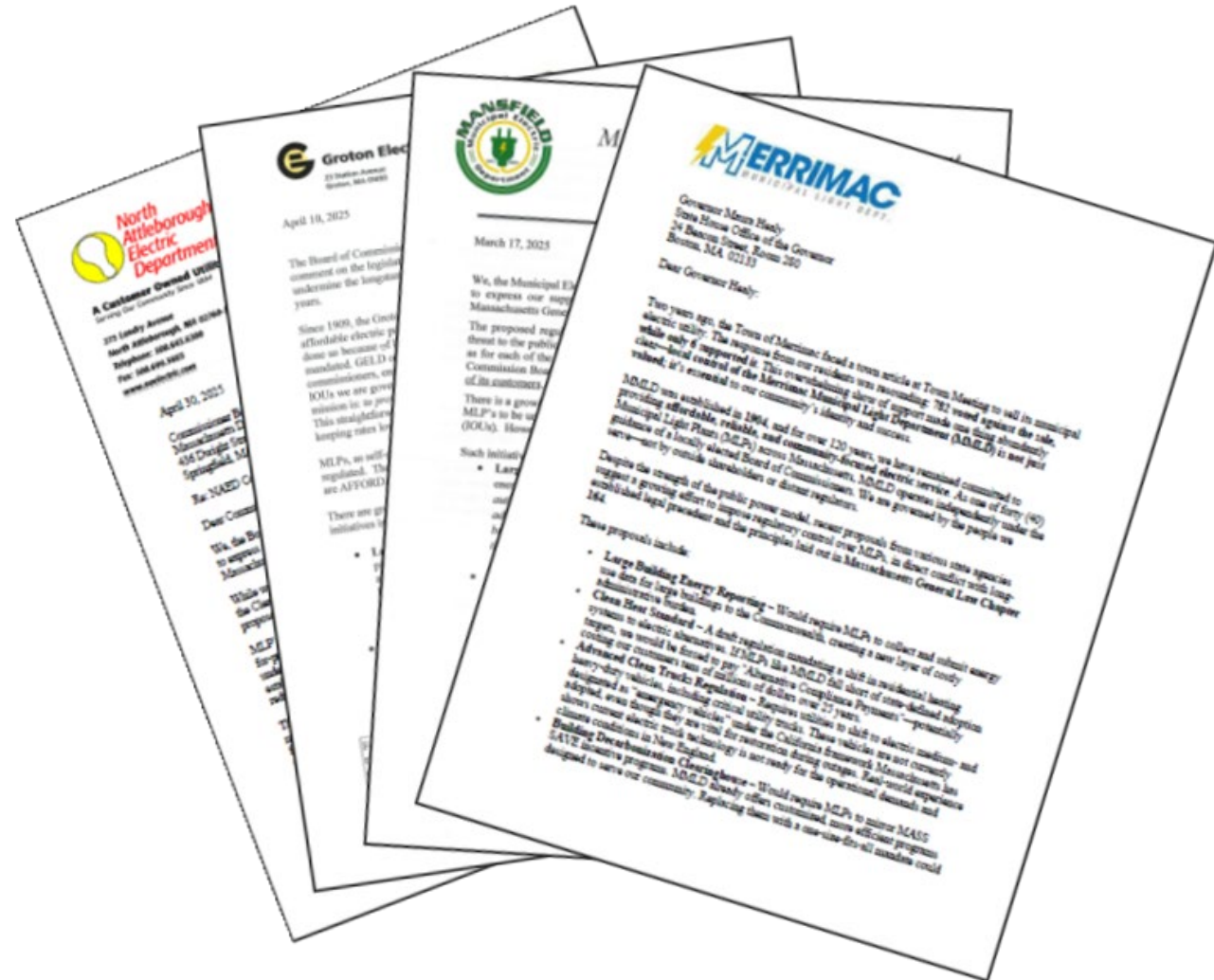
MLPs lack some of the organizational resources to deal with large data sets, data requests, getting customer consent, and legal funds to cover unintended lawsuits.

WHERE DOES IT GO FROM HERE?

-
- Will there be further requirements that enter into MLP territory?
 - Will MLPs have the resources to address them?
 - Will they do more to reduce emissions than MLPs are already doing?
 - Will they be in conflict with existing laws?

WHAT HAVE OTHERS DONE?

- At least 13 of the 40 Municipal Light Plants have written letters signed by Light Boards.
- Many were addressed to MassDEP, while some were addressed to the Governor.



March 27, 2025

Commissioner Bonnie Heiple
Massachusetts Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103

Re: SHELD Comments on the Clean Heat Standard and Municipal Utilities

Dear Commissioner Heiple:

We, the elected members of the South Hadley Electric Light Department ("SHELD") Board of Commissioners ("SHELD Board"), are pleased to offer our comments with respect to the Massachusetts Department of Environmental Protection's ("DEP") Clean Heat Standard ("CHS") draft framework and its expected impact on SHELD and our customers, if finalized into a regulation. While we accept the need to set building sector targets to achieve greenhouse gas ("GHG") emissions reductions goals in the Clean Energy and Climate Plan for 2050, we do not agree with the CHS draft framework or its proposed application to municipal light plants ("MLPs").

MLPs are not regulated the same way as investor-owned utilities ("IOUs") because IOUs are franchised, for-profit monopolies, whereas MLPs are municipal departments regulated at the local level as provided under state law. As elected municipal utility commissioners, it is our power and duty to regulate our MLPs and establish their rates, and we are proud of our record furthering the Commonwealth's objective of reducing GHG emissions.

The CHS draft framework is overly prescriptive and does not recognize or allow SHELD to count the transformative work that the Town of South Hadley is doing to contribute to reductions in GHG emissions in the buildings sector. SHELD has implemented new programs targeting the reduction of Green House Gas emissions while already meeting the States 2040 net zero goals established. These will be major contributions toward reducing the Town's buildings sector emissions, yet, under the current draft framework, none of these efforts would count toward the CHS targets.

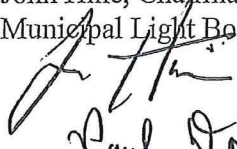
We are also greatly concerned about the potential penalties being passed onto our customers. Using the tools provided by the DEP, staff at the SHELD have approximated the potential amount of Alternative Compliance Payments ("ACPs") to be \$500,000 per year, on average. This is a conservative estimate, as it only includes full heat-pump replacements and no emissions reductions. This amount represents a 3% electric rate increase at a time when many of SHELD's customers are struggling with electric bills. Higher electric rates may deter electrification in SHELD, and ACPs will cause money to flow out of our community and benefit customers in other communities.


There are many ways by which the Commonwealth and the DEP can incentivize homeowners to convert their home-heating systems away from fossil fuels without involving utility companies. For instance, homeowners could be required to convert at the time of sale or major home upgrade or rehabilitation. MLPs, along with their municipalities, can certainly create and design initiatives under their own authority. SHELD has been doing this by offering rebates for Heat Pumps and Green House Gas Reduction technology for years. Penalizing SHELD customers for technology we already provide rebates on would be counterintuitive to our mission as an MLP.

We are willing to speak with you about our concerns with the CHS draft framework and our proposed changes that take into account our perspective as an electric municipal utility. Thank you for your attention to this letter and for your work on behalf of the Commonwealth.

Respectfully,

John Hine, Chairman
Municipal Light Board


Paul Dobosh, Vice Chairman
Municipal Light Board


Ronald Coutu, Clerk
Municipal Light Board


Kurt Schenker, Commissioner
Municipal Light Board


Thomas Terry, Commissioner
Municipal Light Board



Groton Electric Light

23 Station Avenue
Groton, MA 01450

tel: 978-448-1150
fax: 978-448-1159



April 10, 2025

The Board of Commissioners of the Groton Electric Light Department (GELD) would like to comment on the legislative initiatives by Massachusetts state agencies that are trying to undermine the longstanding autonomy that municipal light plants (MLPs) have had for over 100 years.

Since 1909, the Groton Electric Light Department (GELD) has provided safe, reliable, and affordable electric power to all residents and businesses within the Town of Groton. We have done so because of long-standing policies that are made at the local level and are not state-mandated. GELD operates independently under the oversight of a locally elected board of commissioners, ensuring that its governance aligns with the interests of its customers. Unlike IOUs we are governed by the people we serve, and not by shareholders or distant regulators. Our mission is: *to provide our customers reliable power and excellent service at affordable prices.* This straightforward approach has proven to be highly effective in delivering tangible results, by keeping rates low while simultaneously reducing our carbon intensity.

MLPs, as self-governing entities, can reach the goals set by the state without being overly regulated. The two consistent traits that set MLPs apart from Investor-Owned Utilities (IOUs) are AFFORDABILITY and RELIABILITY.

There are growing concerns in the public power community regarding several regulatory initiatives including:

- **Large Building Reporting** – MLPs, as public entities, are extremely sensitive to providing customer billing information to a third party without specific approval from the account holder. The proposed regulation would not require such customer consent and DOER does not have the authority over MLPs to provide such data. The DOER should require such electric usage information directly from large building owners in MLP territories as it has for other energy usage requests.
- **Clean Heat Standard** – draft mandate to have MLPs convert a certain percentage of household heating systems for electrification. Such mandate includes ‘Alternative Compliance Payment’ if the heat pump conversion targets are not met; this *would be extremely costly for Groton Electric customers.* Additionally, the CHS framework does not account for meaningful local initiatives that significantly contribute to emissions reductions.

For example, Groton Electric has implemented exclusive Time-of-Use rates for all residential rate classes which has significantly reduced our peak load when fossil fuels are the main source of electric generation in New England. Our autonomy with local control makes this possible, but our innovative efforts do not count toward DOER target goals.

- **Advanced Clean Trucks regulation** – would require truck distributors to sell a gradually increasing percentage of electric medium and large heavy duty (e.g. utility bucket trucks). Indirectly, this would greatly hinder MLP’s ability to have reliable trucks for emergency restoration efforts. Even though these trucks are essential to emergency response, they are not categorized as ‘Emergency’ vehicles under the California standard (which the Commonwealth of Massachusetts has adopted as its standard). *This could triple utility truck prices, and because of our relatively small size, that cost will increase rates for our customers.*
- **Building Decarbonization Clearinghouse** – straw proposal which would mandate MLPs to offer Mass Save level incentive programs. Our primary customer base is residential. These funds would be collected from all customers, including low-income households and elderly residents on fixed incomes who struggle with rising energy costs. However, higher-income residents disproportionately access these programs due to their financial means. Like the Mass Save program, this proposal risks creating a system where the vulnerable subsidize programs that benefit more affluent customers. If mandated, this change would cost Groton Electric customers over \$3M annually (which is 25% of our overall revenue).

It appears that the Commonwealth is attempting to force all MLPs to adopt a standard by which the IOUs are measured and implement very costly and inefficient practices. By any measure of success, MLPs outperform and are more efficient than the IOUs in reliability, affordability, carbon reduction and overall customer satisfaction. Why subject MLPs to the same lower and more costly standards of the IOUs?

Let us do what we do best – govern our own local utility for the benefit of our ratepayers.

If the state is successful, these mandates could remove local control from individual communities and the locally elected Board of Commissioners. We intend to defend the public power model as presently defined under Massachusetts General Law Chapter 164.

We *urgently* ask all legislators, including our state delegation, to support PUBLIC POWER and tell state regulators to stop attempting to force MLPs to imitate the Investor-Owned Utility business model with higher costs and inefficient practices. Instead, they should invest their time and energy to make electricity more ‘affordable’ and ‘reliable’ for ALL ratepayers within the Commonwealth by imitating the MLP (aka Public Power) business model.

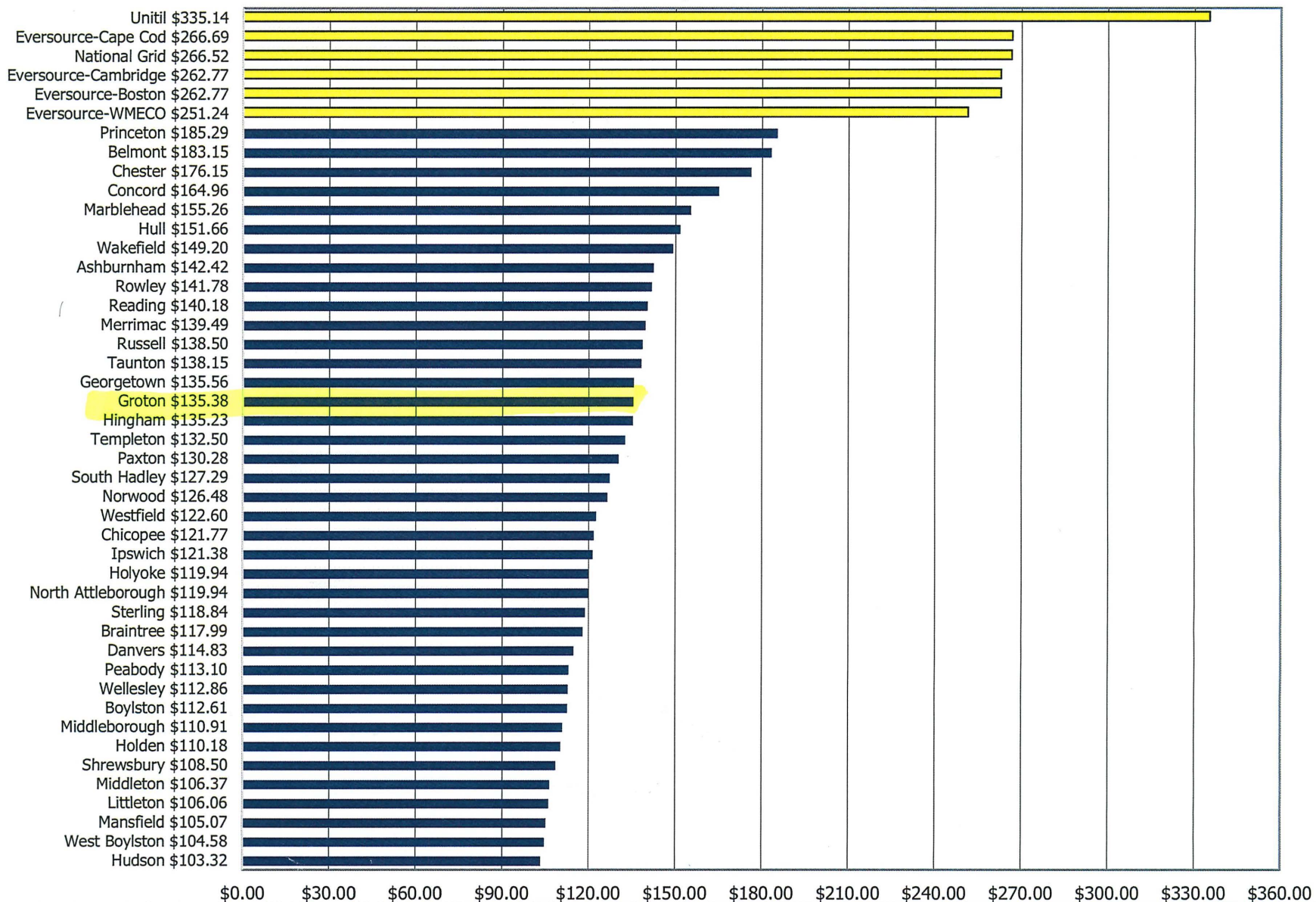
Respectfully submitted,
Board of Commissioners of the Groton Electric Light Department

Rodney R. Hersh
Chairman (Serving GELD for 33 years)

Eric S. Fisher
Clerk (Serving GELD for 5 years)

Kevin J. Lindemer
Member (Serving GELD for 26 years)

Residential Rate Comparisons 750 kWh 12 Month Average Rate (January 2024 - December 2024)





A Customer Owned Utility
Serving Our Community Since 1894

275 Landry Avenue
North Attleborough, MA 02760-3501
Telephone: 508.643.6300
Fax: 508.699.5603
www.naelectric.com



April 30, 2025

Commissioner Bonnie Heiple
Massachusetts Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103

Re: NAED Comments on the Clean Heat Standard and Municipal Utilities

Dear Commissioner Heiple:

We, the Board of Electric Commissioners of the North Attleborough Electric Department (NAED), wish to express our support of 'local control' of the Public Power model as currently provided under Massachusetts General Law Chapter 164.

While we accept the need to set targets to achieve greenhouse gas ("GHG") emissions reductions goals in the Clean Energy and Climate Plan for 2050, we do not agree with the CHS draft framework or its proposed application to municipal light plants ("MLP's").

MLP's are not regulated the same way as investor-owned utilities ("IOUs") because IOUs are franchised, for-profit monopolies, whereas MLP's are municipal departments regulated at the local level as provided under state law. As elected municipal utility commissioners, it is our duty to regulate our MLP's and establish their rates, and we are proud of our record furthering the Commonwealth's objective of reducing GHG emissions.

The proposed regulations by state agencies (DOER, DEP and EEA) are direct threats to the public power model and to the authority of the NAED Board of Electric Commissioners, as well as for each of the forty (40) Municipal Light Plants (MLPs) in the Commonwealth of Massachusetts. Each Board of Commissioners has sole authority to set rates, establish policy, and to serve the overall best interest of its customers.

There is a growing concern in the Public Power community the state is taking administrative authority over MLP's, as they have with Investor Owned Utilities (IOUs). However, no legal authority exists by these state agencies in the particular matters in question. Examples of over-reach that threaten the 'Public Power' model include:

Large Building Reporting - regulation that requires all MLPs to report all large building energy information to the Commonwealth. The regulatory body authoring the bill had no authority to mandate MLPs to provide such data. MLPs were selectively added by the DOEP administration. A significant additional concern is that public disclosure of such sensitive business customer load data could lead to a competitive disadvantage for all businesses within the Commonwealth.

Clean Heat Standard - draft mandate to have MLPs convert a certain percentage of household heating systems for electrification. Such mandate includes 'Alternative Compliance Payment' if the heat pump conversion targets are not met, which using the Commonwealth's own calculator, *We cannot compel compliance so this could add costs totaling over 60 million Dollars over 25 years to North Attleborough Electric ratepayers, resulting in drastically increasing our rates over the same period to cover the 2-3 million dollars per year.*

Advanced Clean Trucks Regulation - would require truck distributors to sell a gradually increasing percentage of electric medium and large heavy duty (e.g. utility bucket trucks). Indirectly, this would greatly hinder MLPs' ability to have reliable trucks for emergency restoration efforts. Even though these trucks are essential to emergency response, they are not categorized as 'Emergency' vehicles under the California standard (which Commonwealth of Massachusetts had adopted as its standard). *Practical examples have shown that such current technology does not perform well in New England.*

Building Decarbonization Clearinghouse - straw proposal which would mandate MLPs to offer Mass Save level incentive programs. Even though our individual utilities have their own community sponsored programs that are more effective in delivering results, this mandate (if allowed) *would add over \$10M or ~30% annually in additional costs to NAED ratepayers. (*using 5 cent per kilowatt hour for all kwh's sold).*

Clean Energy Bill - permitting and siting reform language for renewable energy projects. *Since NAED is the sole electricity supplier for North Attleborough customers, its applicability and what it pays for generation supply can only be negotiated by NAED so that it fits within its power portfolio.*

Currently, NAED has some of the lowest rates in the Commonwealth (see Rate Comparison Chart below) which is less than half (1/2) the cost for the same electricity as compared to any of the state's IOUs. NAED also has a superior reliability record which includes a local storm response staff who respond to customers quickly and have services restored much faster than any IOU historically. Finally, our power portfolio is currently 50% (see Power Portfolio Chart below) non-carbon emitting and therefore we are well over our 'net-zero' emission goals for 2030. We are continually looking for carbon-free resources to add to our portfolio through our local control.

Since 1894, NAED has provided safe, reliable and affordable electric power to all of the residents and businesses within the Town of North Attleborough. We have done so because of the long-standing policies that are made here at the local level and not by state regulation.

We urgently ask all legislators, including our state delegation, to support 'Public Power' and to tell state regulators to stop attempting to force MLPs to imitate the Investor Owned business model with higher costs and inefficient practices. Instead, they should invest their time and energy to make electricity more 'affordable' and 'reliable' for ALL ratepayers in the Commonwealth by imitating the Public Power model.

Sincerely,



Steven Cabral, Commissioner



Craig Cameron, Commissioner

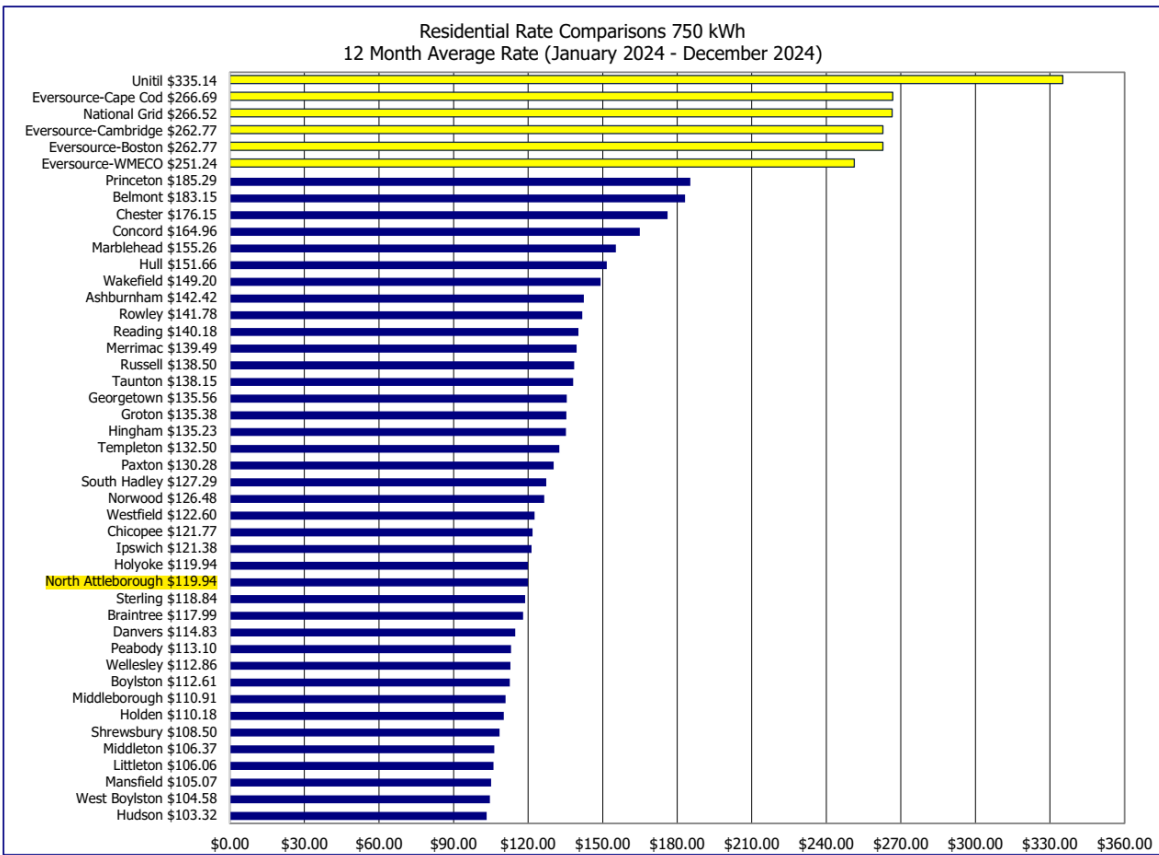


Gregg Ellis, Commissioner

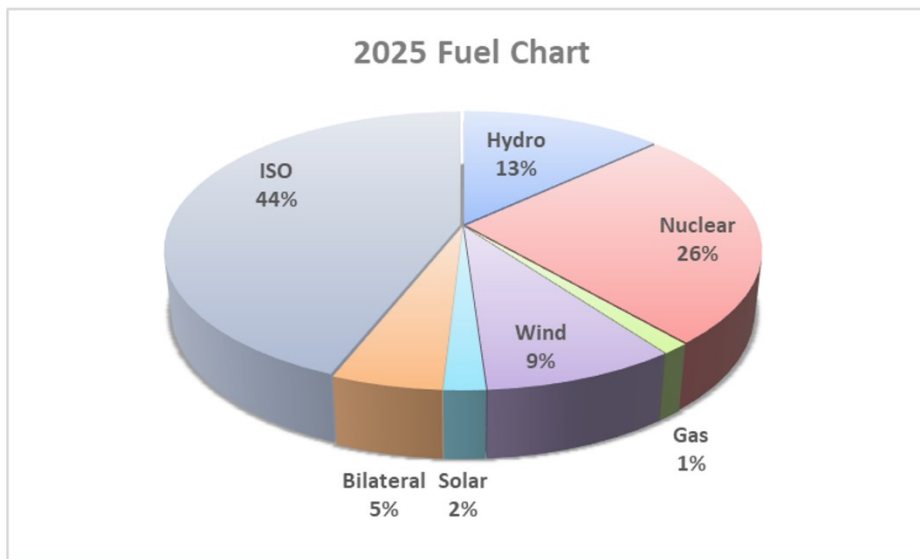


Kory Campbell, Commissioner

William Kabai, Commissioner



2025 Fuel and Renewables





Mansfield Municipal Electric Department

125 High Street, Unit 2; Mansfield, Massachusetts 02048

Board of Electric Light Commissioners

March 17, 2025

We, the Municipal Electric Commission of the Mansfield Municipal Electric Department (MMED), wish to express our support of 'local control' of the Public Power model as currently provided under Massachusetts General Law Chapter 164.

The proposed regulations promulgated by various state agencies (DOER, DEP, and EEA) is a direct threat to the public power model and to the authority of the Mansfield Board of Commissioners, as well as for each of the (40) Municipal Light Plants (MLPs) in the Commonwealth of Massachusetts. Each Commission Board has sole authority to set rates, establish policy, and to serve the overall best interest of its customers.

There is a growing concern in the Public Power community to make Mansfield Electric and other MLP's to be under the administrative authority of the state, as they have with Investor Owned Utilities (IOUs). However, no legal authority exists by these state agencies in the particular matters in question.

Such initiatives that threaten the 'Public Power' model include:

- **Large Building Reporting** – regulation that requires all MLPs to report all large building energy information to the Commonwealth. *The language in reference bill had no such authority to mandate MLPs to provide such data. MLP's were selectively added by the DOER administration. A significant additional concern is that public disclosure of such sensitive business customer load data could lead to a competitive disadvantage for all businesses within the Commonwealth.*
- **Clean Heat Standard** – draft mandate to have MLPs convert a certain percentage of household heating systems for electrification. Such mandate includes 'Alternative Compliance Payment' if the heat pump conversion targets are not met, which using the Commonwealth's own calculator, would add costs totaling about \$64M over 25 years to Mansfield Electric ratepayers.
- **Advanced Clean Trucks regulation** – would require truck distributors to sell a gradually increasing percentage of electric medium and large heavy duty (e.g. utility bucket trucks). Indirectly, this would greatly hinder MLP's ability to have reliable trucks for emergency restoration efforts. Even though these trucks are essential to emergency response, they are not categorized as 'Emergency' vehicles under the California standard (which Commonwealth of Massachusetts has adopted as its standard). *Practical examples have shown that such current technology does not perform well in New England.*

- **Building Decarbonization Clearinghouse** – straw proposal which would mandate MLPs to offer MASS SAVE level incentive programs. Even though our individual utilities have their own community sponsored programs that are more effective in delivering results, this mandate (if allowed) would add over \$11M annually in additional costs to Mansfield Electric ratepayers.
- **Clean Energy Bill** – permitting and siting reform language for renewable energy projects. *Since MMED is the sole electricity supplier for Mansfield customers, its applicability and what it pays for generation supply can only be negotiated by MMED so that it fits within its power portfolio.*

Currently, **Mansfield Electric has one the lowest rates in the Commonwealth** (see Rate Comparison Chart below) **which is approximately ½ the cost for the same electricity as compared to any of the IOUs.** MMED also has a superior reliability record which includes a local storm response staff who gets customers back in service much quicker than any IOU utility. Finally, our power portfolio is currently at 76% (See Power Portfolio Chart below) **non-carbon emitting and therefore we are well over our ‘net-zero’ emission goals for 2040.**

Since 1903, the Mansfield Municipal Electric Department (MMED) has provided safe, reliable and affordable electric power to all the residents and businesses within the Town of Mansfield. We have done so because of the long-standing policies that are made here at the local level and not by state regulation.

We urgently ask all legislators, including our state delegation, to support ‘Public Power’ and to tell state regulators to stop attempting to force MLPs to imitate the Investor Owned business model with higher costs and inefficient practices. Instead, they should invest their time and energy to make electricity more ‘affordable’ and ‘reliable’ for ALL ratepayers within the Commonwealth by imitating the Public Power model.

Sincerely,



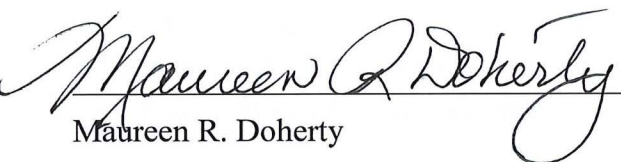
Brendan Roche

Chair




Walter Wilk

Vice Chair



Maureen R. Doherty

Clerk



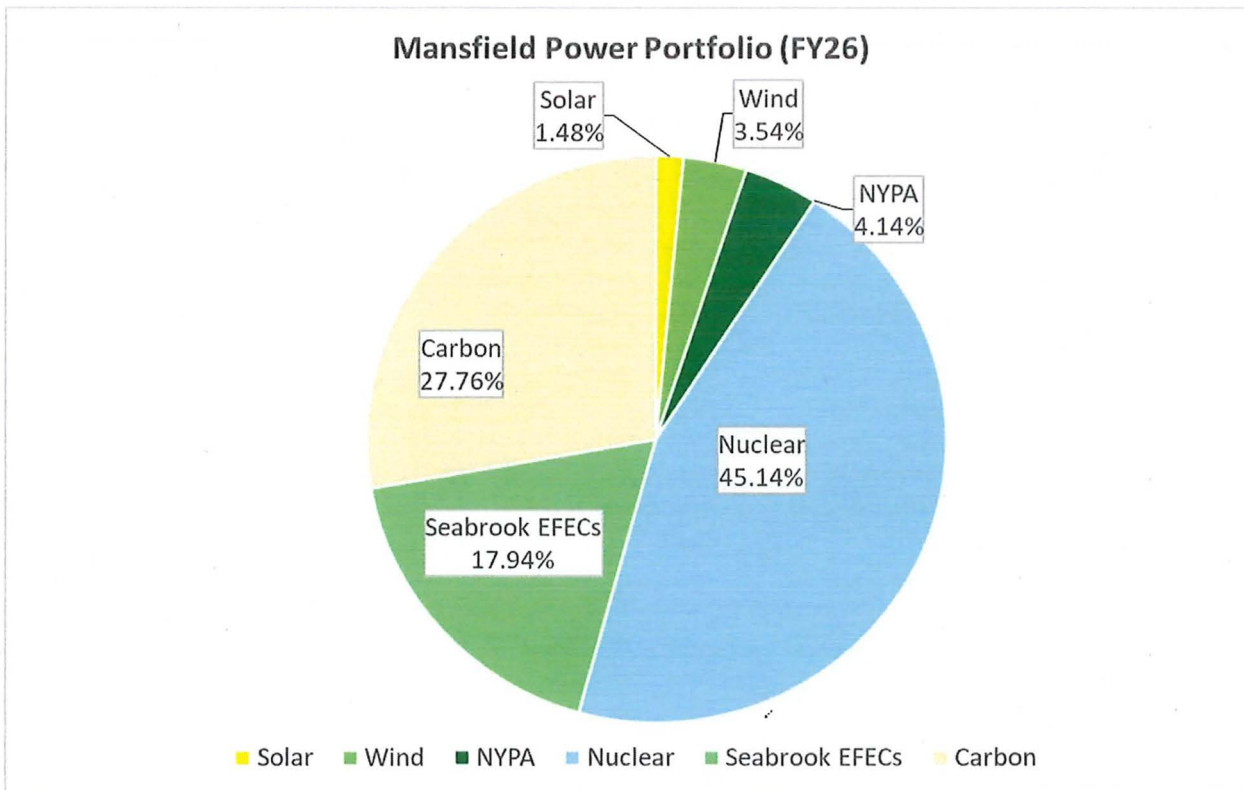
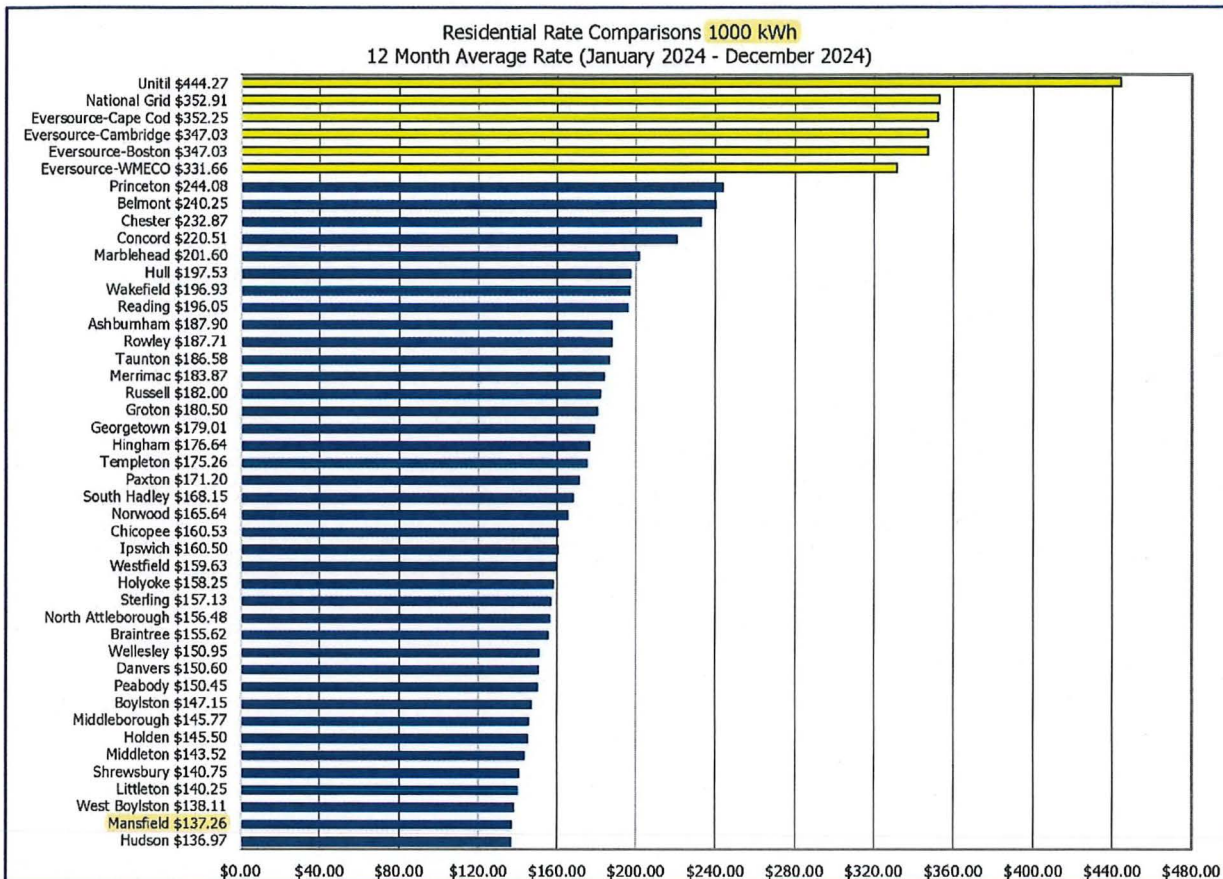
Diana Bren

Commissioner



Michael Trowbridge

Commissioner





86 Bridge Street, P.O. Box 20, Baldwinville, MA 01436-0020
TEL: 978-939-5323
FAX: 978-939-4309
John M. Driscoll, *General Manager*

March 17, 2025

We, the Municipal Light Commission of the Templeton Municipal Light Plant (TMLP), wish to express our support of 'local control' of the Public Power model as currently provided under Massachusetts General Law Chapter 164.

The proposed regulations promulgated by various state agencies (DOER, DEP and EEA) are direct threats to the public power model and to the authority of the TMLP Board of Commissioners, as well as for each of the forty (40) Municipal Light Plants (MLPs) in the Commonwealth of Massachusetts. Each Board of Commissioners has sole authority to set rates, establish policy, and to serve the overall best interest of its customers.

There is a growing concern in the Public Power community to make TMLP and other MLPs to be under the administrative authority of the state, as they have with Investor Owned Utilities (IOUs). However, no legal authority exists by these state agencies in the particular matters in question.

Such initiatives that threaten the 'Public Power' model include:

Large Building Reporting – regulation that requires all MLPs to report all large building energy information to the Commonwealth. *The language in reference bill had no such authority to mandate MLPs to provide such data. MLPs were selectively added by the DOER administration. A significant additional concern is that public disclosure of such sensitive business customer load data could lead to a competitive disadvantage for all businesses within the Commonwealth.*

Clean Heat Standard – draft mandate to have MLPs convert a certain percentage of household heating systems for electrification. Such mandate includes 'Alternative Compliance Payment' if the heat pump conversion targets are not met, which using the Commonwealth's own calculator, would add costs totaling about \$13M over 25 years to Templeton Municipal Light Plant ratepayers.

Advanced Clean Trucks Regulation – would require truck distributors to sell a gradually increasing percentage of electric medium and large heavy duty (e.g. utility bucket trucks). Indirectly, this would greatly hinder MLPs' ability to have reliable trucks for emergency restoration efforts. Even though these trucks are essential to emergency response, they are not categorized as 'Emergency' vehicles under the California standard (which Commonwealth of Massachusetts had adopted as its standard). *Practical examples have shown that such current technology does not perform well in New England.*

Building Decarbonization Clearinghouse – straw proposal which would mandate MLPs to offer Mass Save level incentive programs. Even though our individual utilities have their own community sponsored programs that are more effective in delivering results, this mandate (if allowed) would add over \$2M annually in additional costs to TMLP ratepayers.

Clean Energy Bill – permitting and siting reform language for renewable energy projects. *Since TMLP is the sole electricity supplier for Templeton customers, its applicability and what it pays for generation supply can only be negotiated by TMLP so that it fits within its power portfolio.*

Currently, **TMLP has some of the lowest rates in the Commonwealth** (see Rate Comparison Chart below) **which is approximately half (1/2) the cost for the same electricity as compared to any of the state's IOUs.** TMLP also has a superior reliability record which includes a local storm response staff who get customers back in service much quicker than any IOU. Finally, our power portfolio is currently 64% (see Power Portfolio Chart below) non-carbon emitting and therefore we are well over our 'net-zero' emission goals for 2030.

Since 1906, the TMLP has provided safe, reliable and affordable electric power to all of the residents and businesses within the Town of Templeton. We have done so because of the long-standing policies that are made here at the local level and not by state regulation.

We urgently ask all legislators, including our state delegation, to support 'Public Power' and to tell state regulators to stop attempting to force MLPs to imitate the Investor Owned business model with higher costs and inefficient practices. Instead, they should invest their time and energy to make electricity more 'affordable' and 'reliable' for ALL ratepayers in the Commonwealth by imitating the Public Power model.

Sincerely,



Dana Blais, Chairman

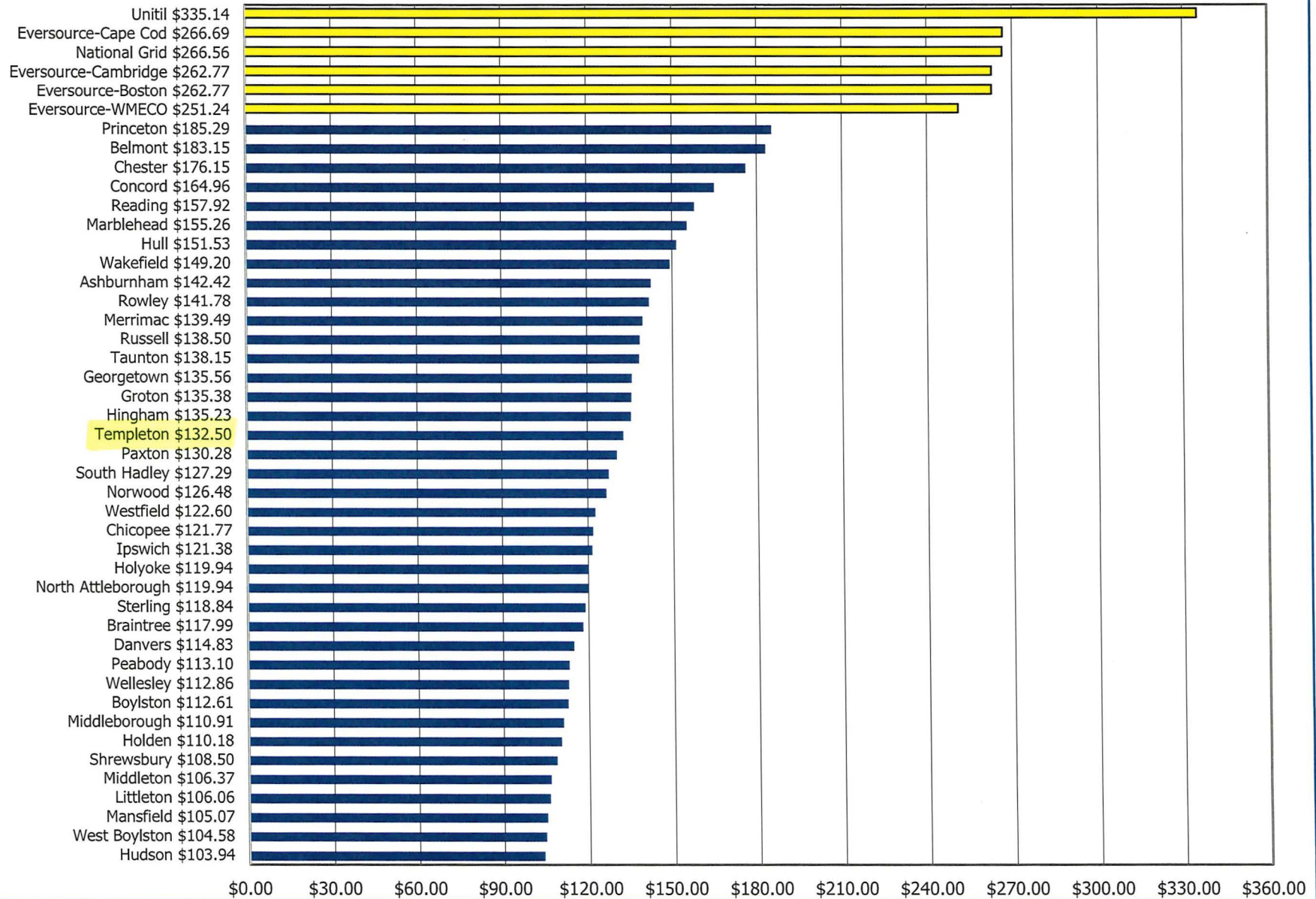


Christopher Stewart, Clerk

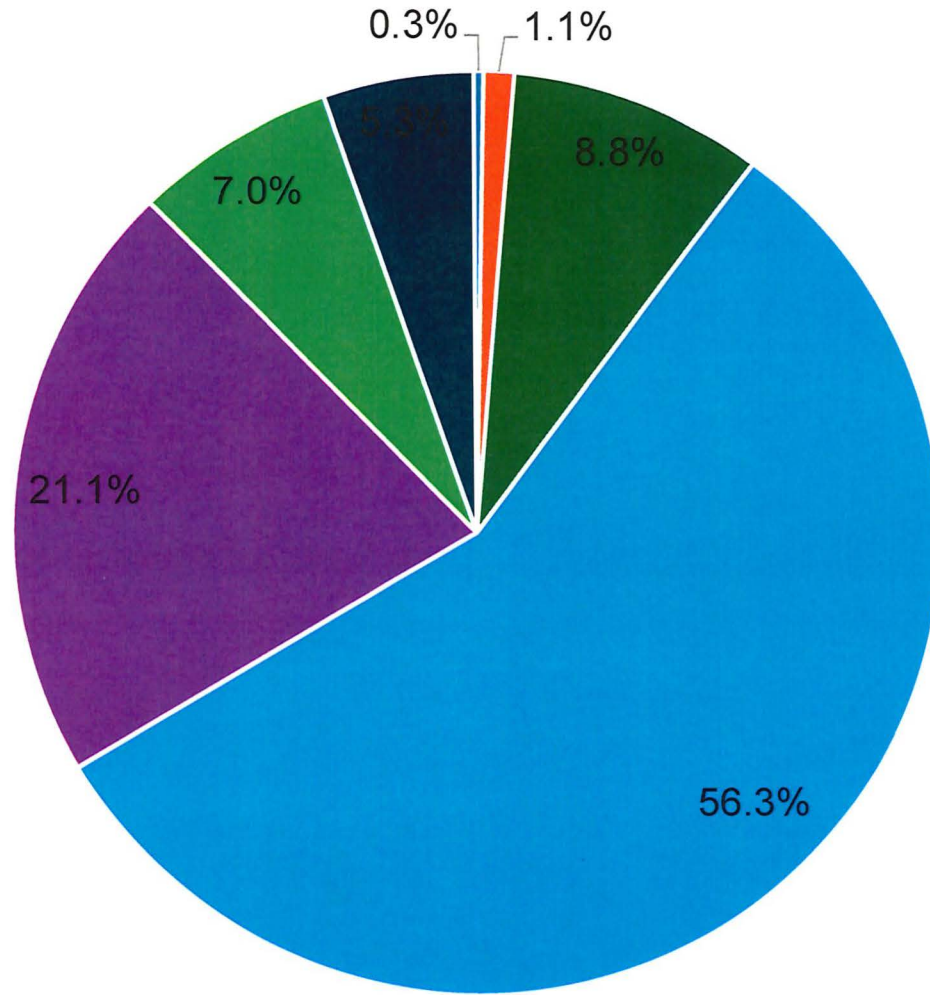


Gregg Edwards, Commissioner

Residential Rate Comparisons 750 kWh 12 Month Average Rate (January 2024 - December 2024)



T.M.L.P. % of 2024 Power Supply Mix



- 2024 Battery
- 2024 Fossil Fuel
- 2024 Hydroelectric
- 2024 Nuclear
- 2024 Other Power
- 2024 Solar
- 2024 Wind



Peabody Municipal Light Plant

Community Owned. Not for profit. It's Ours.

April 17, 2025

Commissioner Bonnie Heiple
Massachusetts Department of Environmental Protection
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: PMLC Comments on Proposed Regulations and Municipal Utilities

Dear Commissioner Heiple:

We, the elected members of the Peabody Municipal Lighting Commission ("PMLC") for the Peabody Municipal Light Plant (PMLP), wish to express our ongoing support for Massachusetts General Law Chapter 164, specifically as it pertains to 'local control' granted to the Public Power business model. It has come to our attention that the Massachusetts Department of Environmental Protection's ("DEP") Clean Heat Standard ("CHS") draft framework would have an expected and significant negative impact on PMLP and our customers if finalized into regulation.

While we understand and support the need to set buildings sector targets to achieve greenhouse gas ("GHG") emissions reductions goals in the Clean Energy and Climate Plan for 2050, we do not agree with the CHS draft framework or its proposed application to municipal light plants ("MLPs"). As drafted, this standard proposes a direct threat to the Public Power model, and to the authority of the PMLC, as well as for each of the (40) MLPs in the Commonwealth. Each Board of Commissioners has the sole authority to set rates, establish policy, and to serve in the overall best interests of its customers.

MLPs are not regulated the same way as investor-owned utilities ("IOUs") because IOUs are franchised, for-profit monopolies, whereas MLPs are municipal departments regulated at the local level as provided under state law. As elected municipal utility commissioners, it is our power and duty to regulate our MLPs and establish their rates. We are proud to maintain electric rates among the lowest in the Commonwealth, and of our outstanding record furthering the Commonwealth's objective of reducing GHG emissions.

The CHS draft framework is overly prescriptive and does not recognize or allow PMLP to count the transformative work that the City of Peabody is doing to contribute to reductions in GHG emissions in the buildings sector. As a designated Green Community, Peabody has committed to a 20% reduction in energy consumption within the next five years and is aiming for net-zero emissions by 2050. The PMLP has also implemented new programs targeting the reduction of GHG emissions while already meeting and, contractually, exceeding the State's 2030 net zero goals.

Additionally, the PMLP, under direction from the PMLC, has partnered with the Center for Eco-Technologies (CET) to design and implement an Inclusive Utility Investment (IUI) program. This program's pilot stage is set to begin in Q3 of 2025 and will allow PMLP customers to enter into a low-interest loan (funded by PMLP) to convert to Heat Pumps. This pilot, if successful, will blossom into a fully funded program that allows customers to take advantage of these low-interest incentives to overcome the initial financial hurdle for the up-front costs of switching to Heat Pumps. These up-front costs, which are typically around \$25,000 - \$50,000 per residence are often more of a deterrent. PMLP and CET's IUI program aims to remove this deterrent by initially absorbing the up-front costs, then collecting those costs through a tariff placed on the customer bill each month for several years until the loan amount is paid



Peabody Municipal Light Plant

Community Owned. Not for profit. It's Ours.

back. This provides a win for the customers, a win for PMLP, a win for the Commonwealth's GHG emissions reduction goals, and a win for our environment.

These will be major contributions toward reducing the City's emissions, yet, under the current draft framework, none of these efforts would count toward CHS targets.

In addition to the proposed loss of local control, we are also greatly concerned about the potential penalties being passed onto our customers. Using the tools provided by the DEP, the potential amount of Alternative Compliance Payments ("ACPs") can be approximated between \$3 million and \$5 million per year, on average. This is a conservative estimate, as it only includes full heat-pump replacements and not emissions reductions. This amount also represents approximately 5% of the PMLP's total annual revenue from ratepayers. Higher electric rates may deter electrification in Peabody, and ACPs will cause money to flow out of our community and benefit customers in other communities.

There are many ways by which the Commonwealth and the DEP can incent homeowners to convert their home-heating systems away from fossil fuels without involving utility companies. For instance, homeowners could be required to convert at the time of sale or major home upgrade or rehabilitation. MLPs, along with their municipalities, can certainly create and design initiatives under their own authority.

We are willing to speak with you about our concerns with the CHS draft framework and our proposed changes that consider our perspective as a municipal electric utility. We hope you will understand the significant positive changes we have already made toward these efforts. Thank you for your attention to this letter and for your work on behalf of the Commonwealth.

Sincerely,

Thomas M. D'Amato, Chair

William C. Aylward, Vice Chair

Raymond J. Melvin, Commissioner

Tracy M. Valletti, Commissioner

Thomas J. Paras, Secretary

Cc: Governor Maura Healey
Senator Joan B. Lovely
Representative Thomas P. Walsh
Representative Sally Kerans
Secretary Rebecca Tepper

WMGLD
P.O. BOX 190 480 North Ave.
Wakefield, MA 01880
Tel. (781) 246-6364 Fax (781) 246-0419
Peter D. Dion, General Manager



Sharon S. Daly, Chair
Thomas H. Boettcher, Secretary
Jennifer L. Kallay
Elton Prifti
John J. Warchol

March 4, 2025

Commissioner Bonnie Heiple
Massachusetts Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103

Re: WMGLD Comments on the Clean Heat Standard and Municipal Utilities

Dear Commissioner Heiple:

We, the elected members of the Wakefield Municipal Gas and Light Department (“WMGLD”) Board of Commissioners (“WMGLD Board”), are pleased to offer our comments with respect to the Massachusetts Department of Environmental Protection’s (“DEP”) Clean Heat Standard (“CHS”) draft framework and its expected impact on WMGLD and our customers, if finalized into a regulation.

While we accept the need to set buildings sector targets to achieve greenhouse gas (“GHG”) emissions reductions goals in the Clean Energy and Climate Plan for 2050, we do not agree with the CHS draft framework or its proposed application to municipal light plants (“MLPs”).

MLPs are not regulated the same way as investor-owned utilities (“IOUs”) because IOUs are franchised, for-profit monopolies, whereas MLPs are municipal departments regulated at the local level as provided under state law. As elected municipal utility commissioners, it is our power and duty to regulate our MLPs and establish their rates, and we are proud of our record furthering the Commonwealth’s objective of reducing GHG emissions.

The CHS draft framework is overly prescriptive and does not recognize or allow the WMGLD to count the transformative work that the Town of Wakefield is doing to contribute to reductions in GHG emissions in the buildings sector. The WMGLD has implemented a moratorium on natural gas service connections on new, multi-family, residential buildings. Wakefield is also in the process of building an all-electric high school and an all-electric regional vocational school. These will be major contributions toward reducing the Town’s buildings sector emissions, yet, under the current draft framework, none of these efforts would count toward the CHS targets.

We are also greatly concerned about the potential penalties being passed onto our customers. Using the tools provided by the DEP, staff at the WMGLD have approximated the potential amount of Alternative Compliance Payments (“ACPs”) to be \$2 million per year, on average. This is a conservative estimate, as it only includes full heat-pump replacements and not emissions reductions. This amount also represents approximately 5% of the WMGLD’s total annual revenue from ratepayers. Higher electric rates may deter electrification in Wakefield, and ACPs will cause money to flow out of our community and benefit customers in other communities.

There are many ways by which the Commonwealth and the DEP can incentivize homeowners to convert their home-heating systems away from fossil fuels without involving utility companies. For instance, homeowners could be required to convert at the time of sale or major home upgrade or rehabilitation. MLPs, along with their municipalities, can certainly create and design initiatives under their own authority.

We are willing to speak with you about our concerns with the CHS draft framework and our proposed changes that take into account our perspective as both a gas and electric municipal utility. Thank you for your attention to this letter and for your work on behalf of the Commonwealth.

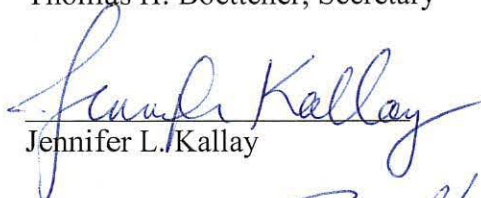
Respectfully,



Sharon S. Daly, Chair



Thomas H. Boettcher, Secretary



Jennifer L. Kallay



Elton Prifti



John J. Warchol

cc: Senator Jason M. Lewis
Representative Donald H. Wong
Representative Kate Lipper-Garabedian



Governor Maura Healy
State House Office of the Governor
24 Beacon Street, Room 280
Boston, MA 02133

Dear Governor Healy:

Two years ago, the Town of Merrimac faced a town article at Town Meeting to sell its municipal electric utility. The response from our residents was resounding: **782 voted against the sale, while only 6 supported it.** This overwhelming show of support made one thing abundantly clear—**local control of the Merrimac Municipal Light Department (MMLD) is not just valued; it's essential** to our community's identity and success.

MMLD was established in **1904**, and for over 120 years, we have remained committed to providing **affordable, reliable, and community-focused electric service.** As one of forty (40) Municipal Light Plants (MLPs) across Massachusetts, MMLD operates independently under the guidance of a locally elected Board of Commissioners. We are governed by the people we serve—not by outside shareholders or distant regulators.

Despite the strength of the public power model, recent proposals from various state agencies suggest a growing effort to impose regulatory control over MLPs, in direct conflict with long-established legal precedent and the principles laid out in **Massachusetts General Law Chapter 164.**

These proposals include:

- **Large Building Energy Reporting** – Would require MLPs to collect and submit energy use data for large buildings to the Commonwealth, creating a new layer of costly administrative burden.
- **Clean Heat Standard** – A draft regulation mandating a shift in residential heating systems to electric alternatives. If MLPs like MMLD fall short of state-defined adoption targets, we would be forced to pay "Alternative Compliance Payments"—potentially costing our customers tens of millions of dollars over 25 years.
- **Advanced Clean Trucks Regulation** – Requires utilities to shift to electric medium- and heavy-duty vehicles, including critical utility trucks. These vehicles are not currently designated as “emergency vehicles” under the California framework Massachusetts has adopted, even though they are vital for restoration during outages. Real-world experience shows current electric truck technology is not ready for the operational demands and climate conditions in New England.
- **Building Decarbonization Clearinghouse** – Would require MLPs to mirror MASS SAVE incentive programs. MMLD already offers customized, more efficient programs designed to serve our community. Replacing them with a one-size-fits-all mandate could



impose unsustainable costs—estimated in the millions annually—while delivering less effective outcomes.

- **Clean Energy Bill** – Includes permitting and siting reforms for renewable energy that could remove or minimize local input on major infrastructure projects.

Collectively, these proposals represent a troubling shift. They apply regulatory models built for **Investor-Owned Utilities (IOUs)**—which are driven by profits and answer to shareholders—to community-owned utilities like MMLD, which exist solely to serve the public. MMLDs consistently outperform IOUs in key metrics such as reliability, cost control, and customer satisfaction.

Most importantly, these initiatives threaten the core of what has made MMLD successful for more than a century: **local governance**. The people of Merrimac made their voices heard when they overwhelmingly rejected the sale of their utility. That vote reflected deep trust in the public power model and a strong desire to keep decision-making close to home.

MMLD remains steadfast in our commitment to preserving local control, protecting the interests of our customers, and delivering high-quality, cost-effective service. We urge state leaders and agencies to recognize the value of community-owned utilities and to support regulatory approaches that respect our autonomy, history, and ongoing success.

Sincerely,

A handwritten signature in black ink, appearing to read 'Norman R. Denault'.

Norman R. Denault (Apr 10, 2025 09:00 EDT)

Norman Denault, Chairman
Merrimac Municipal Light Department Commissioner

A handwritten signature in black ink, appearing to read 'Kenny Rhudick'.

Kenny Rhudick (Apr 10, 2025 12:46 EDT)

Kenny Rhudick, Vice Chairman
Merrimac Municipal Light Department Commissioner

A handwritten signature in black ink, appearing to read 'Edward R. Davis'.

Edward R. Davis (Apr 10, 2025 11:53 EDT)

Ed Davis
Merrimac Municipal Light Department Commissioner

Cc: Mary Usovicz , General Manager MMLD

Broadband Plans and Pricing Updates

Concord Municipal Light Board Meeting – May 14, 2025

Concord Broadband Offerings Today

- Concord Broadband has made only minor modifications to its tiers since our first customers were billed in 2014.
- The last update in 2023 added some higher-speed tiers.

Tier	Speed	Cost
Res Entry	45/45	\$ 49.95
Res Basic	70/70	\$ 64.95
Res Hi-Speed	150/150	\$ 74.95
Res Ultra	300/300	\$ 89.95
Res 500	500/500	\$ 109.95
Res Gig	1000/1000	\$ 149.95
Bus Entry	70/70	\$ 74.95
Bus Basic	150/150	\$ 89.95
Bus Hi-Speed	275/275	\$ 149.95
Bus Ultra	400/400	\$ 199.95
Bus Enterprise	700/700	\$ 299.95
Bus Gig	1000/1000	\$ 349.95

Challenges

- Expectation of faster speeds due to more bandwidth consumption
- Need to remain competitive with other land- and satellite-based internet providers
- Desire to simplify the pricing plans to reduce confusion
- Want to allow for access to grants to extend availability to MDUs.

Comcast Service Plans in Concord

Res Plan	DS / US (Mbps) /ALT	1 Yr Intro	5 Yr Intro	Regular	Post Intro Eq.
Res 1	400 / 150/30	\$40.00	\$55.00	\$93.00	\$15.00
Res 2	600 / 150/30	\$55.00	\$70.00	\$108.00	\$15.00
Res 3	1100 / 300/30	\$70.00	\$85.00	\$118.00	\$15.00
Res 4	2100/1300 / 300/30	-	\$105.00	\$123.00	\$15.00
Now 1	100 / 20	-	-	\$30.00	-
Now 2	200 / 20	-	-	\$45.00	-

Bus Plan	DS / US (Mbps) /ALT	1 Yr Intro	Standard	Install	Equip Lease
Essential	150 / 150/35	\$59.99	\$99.95	\$129.95	\$24.95
Standard	300 / 300/35	\$79.99	\$149.95	\$129.95	\$24.95
Performance	500 / 300/35	\$109.99	\$199.95	\$129.95	\$24.95
Advanced	800 / 300/35	\$149.99	\$249.95	\$129.95	\$24.95
Gigabit Extra	1250 / 300/35	\$199.99	\$399.95	\$129.95	\$24.95
2 Gigabit	2000 / 300	\$199.99	\$499.95	\$129.95	\$24.95

Comcast Notes:

- + \$10/mo if you don't have ebills and automatic payments
- 5 Yr Intro Residential Rate is a limited time offer through 6/23/25
- Now Plans are internet only, only OTT services & with refurb equip
- Alternate data rates apply to a small part of town, (by Monument Sq & ?)
- Additional Taxes & Fees

Concord Broadband Notes:

- No introductory prices or rate commitments.
- New Residential Installs have a 2yr contract with min early term fee
- We don't mandate Business Services by location
- No Higher Legacy Pricing (e.g., CMLP paying \$149.99 for 16/2 Mbps)
- Generally, we have higher Installation Costs

Next- generation Internet Offerings



New XGS-PON technology allows for faster speeds



New services allow for managed Wi-Fi, security and more



Higher port density prevents costly infrastructure improvements

Objectives

New Tier

In the short-term, offer a tier that meets the pricing and speed requirements for grant funding

Simplify

Once XGS-PON migration is complete, grandfather existing tiers and simplify to 3-4 tiers per service class (instead of 6).

Services

Offer new services for those who want managed Wi-Fi and other benefits, like internet security and parental controls

Communication Methods

Bill inserts

Social media

Workshops & webinars

Email campaigns

Website

Word of mouth



New Costs

New equipment costs more than our old equipment: do we charge more for it or charge a rental fee?

New equipment comes with small monthly costs (under \$3): Do we increase rates, add a separate charge for costs, or absorb the costs.

Moving Forward

- How do we consolidate plans?
- Do we grandfather in people to current plans and require they take action?
- Do we increase the speeds for all tiers and hope not too many people downgrade when they realize they could keep the old speed and save money?
- Automatic payments and lower costs.

Non Carbon-Emitting Power Supply Opportunities

May 14, 20245 Light Board Meeting



CONCORD MUNICIPAL
LIGHT PLANT
ELECTRIC | BROADBAND | ENERGY MANAGEMENT

We're here to serve you



- **Existing** on shore wind, MA Class I RECs, 2026-2030 with ROFR
- **New** on shore wind, MA Class I RECs, term 25 years COD Mid 2026
- **New solar**, MA Class I RECs, term 25 years COD sometime in 2027
- **Existing hydro** imported from NY, ME Class II RECs, term: TBD (minimum of 5 and maximum of 10)