

Concord Municipal Light Board
June 24 , 2020
Final

Pursuant to a notice duly filed with the Town Clerk, a meeting of the Municipal Light Board was held on Wednesday June 24, 2020, at 4:30PM, via a Zoom Webinar. Present were Board Members: Wendy Rovelli, Gordon Brockway, Peggy Briggs, Alice Kaufman and Lynn Salinger. Also in attendance were David Wood, CMLP Director; Laura Scott, CMLP Power Supply and Rates Administrator; Carole Hilton; CMLP Customer Service Administrator, Karin Farrow, CMLP Admin; Jan Aceti, Energy Conservation-Coordinator; Stephen Crane; Concord Town Manager, Brian Foulds, David Allen, Michael Lawson, and Karlen Reed

Note definitions for acronyms used in these minutes:

- CIO: Chief Information Officer
- CMLP: Concord Municipal Light Plant
- EV: Electric Vehicle
- G2: Medium General Service Rate
- G3: Large general Service Rate
- ISO: International Organization for Standardization
- kWh: Kilowatt hour
- MM: Million
- MMWEC: Massachusetts Municipal Wholesale Electric Company
- PILOT: Payment in Lieu of Taxes
- PP: Power Purchase
- R-1: Residential Rate
- RORB: Return on Rate-base
- COS: Cost of Service
- TOU: Time of Use

CALL TO ORDER

Ms. Rovelli called the meeting to order at 4:30 PM. Noted was that the meeting was being recorded. Ms. Rovelli announced that for public participation the meeting would use the Zoom chat function¹ and the raise hand function. Meeting recording to be posted to the website as soon as it is available.²

FUTURE MEETINGS and MINUTES

July 8, 2020, August 12, 2020, September 9, 2020, October 14, 2020, November 18, 2020, December 9, 2020. A December special budget meeting needs to be scheduled.

¹ See Addendum A for transcript.

² Minuteman Media Network Coverage: <https://www.youtube.com/watch?v=EdQ32stHoLw>

The minutes from the March 11, 2020 meeting were still under review. Alice Kaufman will chair the July 8, 2020 meeting.

DIRECTOR'S REPORT

Mr. Wood reported on the status of CMLP activities and projects:

Current CMLP Operating Procedures: CMLP continues to operate with a two-team structure and remains closed to the public. A reopening plan for Concord's municipal government is underway.

Cambridge Turnpike Project: Broadband team has completed Phase 1 - installation of the fiber. All the utilities are de-energized and underground. CMLP overhead electric and fiber optic systems have been removed. Verizon completed their portion of the project and pole removal is in process.

Sub-Station Maintenance: Maintenance testing of circuit breakers at Stations 219 & 223 is complete.

Camera Installation Project: The project to install cameras at Station 219 & 223 is underway with the wiring now complete. The only remaining item is the installation and mounting of the cameras.

300 Baker Avenue: CMLP recently met with the new owners of the property who expressed interest in making the building complex more sustainable with the installation of solar and geothermal with battery storage, EV charging stations, and a 3MW solar canopy over the parking lots.

Recruitment: CIO- Screened 94 applications and, with the aid of the IT Consultant, have narrowed the pool to invite 7 candidates for interviews. A second group of 8 qualified candidates has also been identified if needed. First round interviews are scheduled to be complete by July 2.

Cost of Service Rate Design Discussion: Ms. Scott presented a summary of the allocation methodology utilized by Baker-Tilly in their presentation from the last meeting³. The presentation consisted of four components:

Major Findings:

- o Depending on the desired return on rate base percentage, current rates are generally sufficient to meet CMLP's forecasted revenue requirements for 2020-2025. With the exception of 2025, current forecasted revenue (absent of any return on rate base) cover the forecasted Operating Expenses, PILOT and Depreciation. Using a modest 2% return on rate base, the forecast shows revenue as insufficient for 2021-2025. For Concord to meet its renewable energy portion of the energy supply, rates will need to increase to support the purchase of RECs as follows:

7/1/2020:	Add \$0.0050/kWh to the existing amount of \$0.01 per kilowatt hour
1/1/2021:	Add a further \$0.0050/kWh
1/1/2022:	Add a further \$0.0050/kWh

³ See Addendum B for presentation slides.

The resulting increase in revenue is offset by a corresponding expense increase (REC purchase cost) that results in no change in net income. Forward purchase power price costs are a mix of current forward contracts (approximately 50% of total purchases) and forward market prices based on actual forward market bids and offers. The percentage of forward market prices used (remaining 15-50% balance) for the calculation increases annually. A 2% return on rate base would necessitate a 1 to 5% increase in rates per annum over the period 2020 to 2025.

- o There is a \$2.5M cross subsidy occurring between residential and general service rate classes (primarily G2 and G3 to R-1). The methodology used to allocate costs is complex. For example, the \$1,837,556 allocated to the Residential rate class for ISO capacity costs is a percentage (49.47%) of the total cost. The percentage used is the result of the ratio between two other volumetric numbers 13,796kWh and 27,888kWh. The 13,769 is 84% of 16,406kWh. The 84% is another ratio (the Coincidence Factor). A ratio of the average of all the 6 to 7PM hours in Sept. 2017 (the test year) and the maximum hour in Sept. This calculation is based on allocating based on the highest use hour for the class for the year. The 16,406kWh equals 15,914kWh divided by (1-1.5%-1.5%) a grossing up of the 15,914kWhs for distribution system losses from primary to secondary and secondary to meter. The 15,914kWh is derived from the total residential use recorded for Sept divided by the Sept Residential Load Factor (58.91%) times the number of hours in Sept (720). The Residential Load Factor percent is a ratio, $58.91\% = 7,276\text{kWh} / 12,351\text{kWh}$. 7,276kWh being the average of all kWh in Sept and 12,351kWh the one hour maximum use in Sept. Finally, the 27,888 kWh equals the sum of all the maximum monthly coincident peaks at input voltage. The percentages used for peak represent actual percentages from Eversource as Concord currently lacks the data for actual peak use by rate class. The second example provided the calculations factors used in determining the \$747,023 allocated to the residential Class for Administrative & General Salaries. The allocator used is called Expense which takes the total cost (\$1,150,896) times 64.91% with the 64.91% ($\$1,579,085 / \$2,432,806$) being derived from the Non PP/Fuel cost for Residential divided by the Total Non PP/Fuel costs. These were just two examples of the layers of calculations utilized to allocate costs to the different rate classes.
- In addition to the Expense allocator, there are also Capital allocators many of which rely on NBV values. The allocation methodology is designed to assign relevant costs to the appropriate rate classes utilizing a variety of Allocators, most of which are summarized below and represent standard industry practices.
 - o **Billing wht.** Number of customers adjusted by the time it takes to bill each customer in the class.
 - o **CP-12** Average of customer peaks with system peaks during each month of the year. (Used to allocate demand related purchase power expenses).
 - o **Customer** Total number of customers in each class.
 - o **Cust. Sec** Weighted average number of customers served at the second voltage level.

- **Cust. Wgt.** Number of customers in each class adjusted by a weighting factor to compensate for the additional time and expense to serve each customer class
- **Direct.SL** Costs allocated directly to streetlight class.
- **Energy** Total energy used by each customer class.
- **Energy Non-Res** Total energy used by non-residential classes.
- **Energy Res** Total energy used by residential classes.
- **Expense** Blended allocator based on all non-fuel expenses.
- **Meter.rd.wgt** Number of customers adjusted for the time it takes to read each type of meter.
- **Meters.wgt** Number of customers adjusted for the cost to purchase meters and associated equipment.
- **NBV** Net Book Value blended allocator based on net plant values.
- **NCP-Input** Peak of each customer class adjusted for system losses.
- **NCP-Sec** Peak of each customer class adjusted for losses occurring in the secondary distribution system.
- **Off-Peak Energy** Total off-peak energy used by customer class.
- **On-Peak Energy** Total on-peak energy used by customer class.
- **Rev** Allocator based on annual revenue from the class.

The factoring of the different classes has a lot to do with utilizing a weighting factor to compensate for the additional time and expense to serve each customer class.

The Board discussed the issue of cross-subsidization between the classes. Ms. Scott clarified that it was not an uncommon practice and one that was part of the last rate study approved of by the Board. Baker-Tilly, the consultant hired by CMLP to conduct the Cost of Service Study indicated that across the country there is a move away from this practice. Should the Board decide to eliminate the difference and set rates closer to cost, it would necessitate a substantial increase to the Residential rates.

- In order to move on to the second part of the Rate Study – Rate Design, the revenue requirement of the Utility needs to be determined by addressing the following points:
 - Return on Rate-base (RORB) percentage – The percentage to be applied to the total eligible asset valuation to determine the Light Plant’s annual allowable return
 - Cross Subsidy – The amount by which the revenue to be collected from a rate class deviates from its calculated cost of service
 - Rate Plan – the Consideration of the combined impact of factoring in a RORB, Transitioning to a COS rate base and the renewable energy surcharges increase.
- CMLP electric rate comparison to other Massachusetts Utilities.
Using data provided by the Massachusetts Municipal Wholesale Electric Company (“MMWEC”) the small user Residential rate for Concord for the period April 2019 – March 2020 was higher than 60% and lower than 40% of the 45 compared rates. Small Commercial rates had only 25% higher and 75% lower. Ms. Scott said that the 60/40 split was a more desirable ranking. When the individual Residential Class rates are compared to the individual Commercial Class rates the

small Commercial (Demand 0: energy 3000) is clearly shown as the worst (had the fewest ranked higher). Movement between classes is possible if a use trend is established. Rate Classes are determined by demand. Unknown is if others in the comparison are cross-subsidizing their small commercial user rates by the rates of their larger users or if low occupancy rates in Concord was a factor. The Board questioned whether the comparatively higher rates for commercial users were a contributing factor of the low tenant occupancy.

In response to a query by Mr. Allen about the legality of cross subsidies, Mr. Wood said he would check with legal counsel about any recent changes, adding that historically cross subsidies deemed illegal focused on preventing discrimination in the rate structure.

Baker-Tilly laid out a plan to gradually increase the Residential rate, over time, to more accurately reflect the Cost of Service over the life to the plan (2020-2025). This would lead to a rate increase of approximately a 3% annually, Ms. Scott reminded the Board that this would be an increase above any REC rate increase for Residential rates. She also noted that with the use of Smart Meters, the data collected would allow actual costs to be assigned directly to users. Transitioning to a single rate (like Concord's Real Estate Taxes) was discussed with points being made that different rates is the current industry standard. In addition, some of CMLP's biggest commercial customers were exempt from property taxes and there have not been complaints about the current rates. Ms. Scott also pointed out that although complaints are not being voiced that rates may be a factor in causing new business to look elsewhere.

The Board consensus was that a rate structure change to remove the cross subsidy was not the best strategy at this time.

MOTION

Ms. Salinger moved that CMLP adopt a policy of not letting any rate class have a rate that exceeds more than 20% of its estimated cost of service. Ms. Briggs seconded the motion. The motion was voted unanimously by the Board in a roll call vote.

The board then discussed what the appropriate rate of return on base should be for the rate study. Ms. Scott noted that a 2% return will result in a short fall, while a 2.5% rate will require the board to raise rates 1-5% between 2021 - 2025

MOTION

Ms. Briggs moved that the Return on Rate Base be established at 2.5%, The motion was seconded by Ms. Kaufman and followed by a unanimous roll call vote.

There was further discussion about the small commercial customers and whether this rate should coincide with a rate similar to residential customers

MOTION

A vote to transition the rates for Small Commercial Customers to a rate that is similar to the rank (40%) of the Residential rate in the MMWEC rate comparisons. A motion was moved by Ms. Kaufman, seconded by Ms. Briggs and with a unanimous roll call vote so moved.

Renewable Energy Credit Strategy - The Board reviewed its 2017 strategy for purchasing RECs. Option B had been the preferred option and would require a rate increase of \$0.005/kWh effective July 1, another \$0.005 in January of 2021 and a third rate increase of \$0.005 in January 2022. Discussion centered on the rapid increase in the cost of RECs, increasing competition for RECs and the limited number of RECs CMLP could purchase with the financial allotment it had budgeted. This resulted in a decrease in the renewable portion of the energy portfolio and making it more difficult to reach Concord's goals for 100% renewable energy by 2030.

Mr. Wood requested that the \$.005 increase discussed at the March Board Meeting be implemented to put CMLP back on track to become 100% carbon free. Mr. Wood suggested the Board review the proposed increases prior to each rate hearing.

A rate hearing will be heard on July 8, 2020 to help CMLP achieve the goals for reaching 100% renewable energy portfolio by 2030. CMLP staff will present a recommendation for the increase, which will include an implementation date.

Liaison & Public Comment

Mr. Foulds requested Ms. Scott provide copies of her presentation and the Excel sheets used to for the allocation process.

Mr. Brockway asked if the Town was providing assistance to those in need due to the pandemic. Mr. Crane offered that the Concord Community Chest is supporting those in need, and that additional donations are welcome. He also informed the Board of Concord Together, another local organization offering assistance to those in need. Mr. Wood said that CMLP has posted a message on the website and a message will be added to bill with contact information, should a customer need assistance with bill paying due to the pandemic. Mr. Wood also said that CMLP will not shut off power to any customer during this time for inability to pay for service. To date, only a few commercial customers have requested assistance. Mr. Crane suggested that a representative from Concord Together or Economic Vitality be invited for their input as well.

Adjourn

Ms. Salinger moved to adjourn the meeting. Ms. Kaufman seconded and followed by a unanimous roll call vote, the meeting was adjourned at 6:10PM.

Respectfully submitted,
Alice Kaufman, Clerk

Addendum A: Script of Chat from meeting

- 16:39:13 From Brian Foulds to All panelists : That is great!
- 17:11:32 From Brian Foulds to All panelists : Yes
- 17:29:57 From Brian Foulds to All panelists : This has been a very helpful COSS.
- 17:37:29 From Brian Foulds to All panelists : The R-1 rate needs to move in one direction...up. Please start acting now to avoid future rate shock.
- 17:37:50 From Jan Aceti to All panelists : We could look at our last commercial customer survey to see how they feel about rates.
- 17:42:28 From Jan Aceti to All panelists : TOU rates are intended to send signals about when costs occur. That is seen as a good thing, so that customers take appropriate action to keep costs down. Would we want to reduce the cross subsidy so that we also send appropriate price signals to those incurring the costs?
- 17:42:44 From Laura Scott to All panelists : even if there are no complaints, we might be preventing new businesses from moving in
- 17:44:12 From Jan Aceti to All panelists : Does Baker Tilly need to know whether we want to continue tiered rates for residential customers?
- 17:45:29 From Brian Foulds : You should clarify that increasing the REC collection effects all rates. Not just the R-1
- 17:51:20 From Brian Foulds : both the same percentile in the MMWAC charts
- 18:05:41 From Brian Foulds : OK, thanks Dave
- 18:14:30 From Brian Foulds : Dave needs to leave
- 18:17:30 From Michael Lawson : Just a thanks and an encourage you to reach out to the business community.



CMLP Cost of Service Study Overview

June 24, 2020

Contents

- Major findings
- Allocation methodology in more detail
- Decision points
- CMLP electric rates compared to other Massachusetts utilities



Major Findings

Major Findings

1. Current rates are generally sufficient to meet CMLP's forecasted revenue requirement during the period 2020-2025, depending on the desired return on rate base percentage. However; rates will necessarily increase about 3% per year from 2020 to 2022 in order to institute the Board's recommended REC surcharge schedule.
2. There is a \$2.5MM cross subsidy occurring between residential and general service rate classes (primarily G2 and G3 to R-1)

Proposed Change Date	Renewable Energy Surcharge
7/1/20	\$0.015
1/1/21	\$0.02
1/1/22	\$0.025

Concord Municipal Light Plant
 Draft Electric Rate Study Report
 Schedule 1.1: Revenue Requirement Summary

	Forecasted 2020	Forecasted 2021	Forecasted 2022	Forecasted 2023	Forecasted 2024	Forecasted 2025
Operating Revenues						
Electric Sales	\$ 26,264,379	\$ 26,273,572	\$ 26,282,767	\$ 26,291,966	\$ 26,301,168	\$ 26,310,374
Base Revenues	232,667	232,668	232,669	232,660	232,661	232,662
PCA, Rate Stabilization and Renewable Rate Surcharge Revenues	280,051	0	0	0	0	0
REC Purchases Surcharge	2,141,992	3,332,337	4,182,878	4,183,453	4,184,029	4,184,604
Other Revenues	921,109	951,136	925,630	906,440	887,025	869,236
Total Operating Revenues	29,850,778	30,789,702	31,623,934	31,614,919	31,604,883	31,596,876
Operating Expenses						
Purchased Power Costs	\$ 17,706,079	\$ 17,591,256	\$ 17,621,979	\$ 17,248,035	\$ 17,504,770	\$ 17,933,306
REC Purchases	2,141,962	3,332,337	4,182,878	4,183,453	4,184,029	4,184,604
Transmission Expense	87,409	89,143	90,912	92,715	94,555	96,430
Distribution Expense	977,889	993,918	1,010,285	1,044,887	1,081,869	1,070,229
Customer Accounts Expense	1,368,260	1,395,395	1,423,078	1,451,311	1,480,103	1,509,467
Administrative & General Expense	3,971,877	4,030,080	4,110,033	4,191,572	4,274,729	4,359,535
SMART Grid Expenses	48,123	47,038	47,971	48,823	49,894	50,883
Total Operating Expenses	26,299,609	27,479,166	28,487,116	28,260,896	28,649,968	29,213,456
Other Operating Expenses						
Payment in lieu of Taxes (P.I.L.O.T.)	\$ 448,753	\$ 448,911	\$ 449,069	\$ 449,228	\$ 449,388	\$ 449,544
Annual Depreciation of Plant In Service	2,097,795	2,211,057	2,248,917	2,272,185	2,295,921	2,389,245
Total Other Operating Expenses	2,546,548	2,659,968	2,697,987	2,721,413	2,745,307	2,838,789
Net Operating Income (Loss)	\$ 1,034,621	\$ 650,568	\$ 438,831	\$ 632,211	\$ 209,608	\$ (455,389)
Net Income before a return on ratebase						
<i>This schedule is included to show a rate of return on ratebase and the operating income or loss at current rates is over or under the revenue requirement of that ratebase and what increase in rates is needed</i>						
Rate Base						
Total Plant in Service	\$ 70,528,814	\$ 75,304,214	\$ 78,598,214	\$ 77,341,814	\$ 78,133,014	\$ 81,243,814
Accumulated Depreciation	(20,629,209)	(30,437,436)	(31,287,743)	(32,105,014)	(32,940,115)	(33,809,080)
Rate Base	40,899,605	44,866,778	45,298,470	45,236,800	45,183,899	47,434,734
Rate of Return						
Return on Rate Base	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%
Revenue Requirement	\$ 29,634,149	\$ 31,036,470	\$ 32,091,072	\$ 31,887,045	\$ 32,298,953	\$ 33,000,940
Operating revenues over/(under) revenue requirement						
	\$ 216,629	\$ (246,767)	\$ (467,138)	\$ (272,525)	\$ (694,070)	\$ (1,404,064)
Rate increase in retail sales needed to meet revenue requirement						
	-0.8%	0.93%	1.76%	1.03%	2.62%	5.29%
Increase in revenue requirement						
		4.7%	3.4%	-0.6%	1.3%	2.2%

Major Finding No. 1

Net Income after a return on ratebase

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Major Finding #2 – Cross Subsidy



1. There is a \$2.5MM cross subsidy occurring between residential and general service rate classes (primarily G2 and G3 to R-1)
2. What assumptions led to the determination that there is a \$2.5MM subsidy occurring?
3. The Study's allocation methodology is complex. Look at 2 examples:
 - \$1,837,556 allocated to the Residential rate class for ISO capacity costs (go to Excel workbook)
 - \$747,023 allocated to the Residential rate class for Administration & General Salaries

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Slide from Baker Tilly Presentation

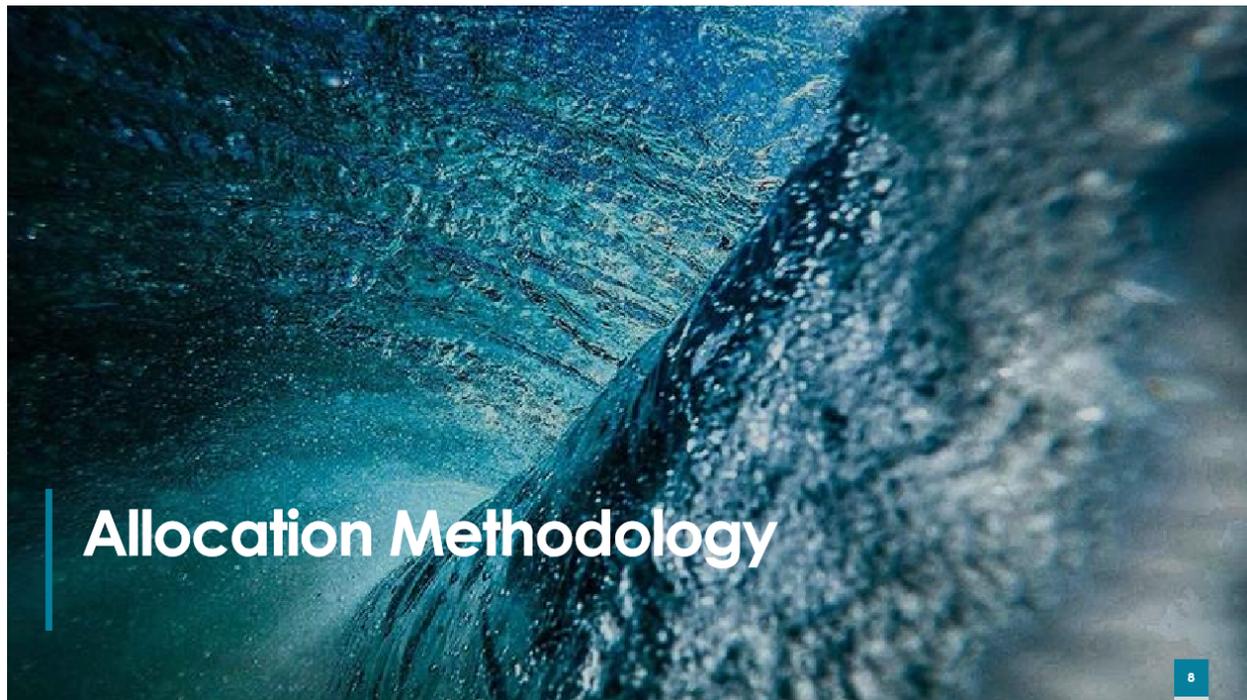


Summary of differences in cost of service and forecasted revenues

Customer Class	Cost of Service	Forecasted		% Over/(Under)
		Revenues at Current Rates	\$ Over/(Under)	
Residential	\$ 13,628,445	\$ 11,525,569	\$ (2,102,876)	-18.2%
Residential Assistance	229,951	87,654	(142,297)	-162.3%
Residential TOU	46,903	22,628	(24,275)	-107.3%
Residential Heating	73,024	50,489	(22,535)	-44.6%
Residential Controlled Water Heating	837,145	667,349	(169,796)	-25.4%
Residential Net Metering	-	33,917	33,917	100.0%
ETS Off Peak	250,034	211,632	(38,402)	-18.1%
Small General Service	2,498,983	2,657,699	158,716	6.0%
Medium General Service	3,830,601	4,774,224	943,623	19.8%
Large General Service	6,728,892	8,204,638	1,475,746	18.0%
General Service Net Metering	-	(10,363)	(10,363)	100.0%
Street Lights	186,390	62,620	(123,770)	-197.7%
Totals	\$ 28,310,367	\$ 28,288,056	\$ 22,311	0.1%

In the % column (far right), Positive means the cost of service is less than forecasted revenues. Negative means the cost of service is greater than forecasted revenues.

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Allocation Methodology

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Calculation of A&G-Fixed

Total Operating Expenses Before A&G

	RESIDENTIAL	RESIDENTIAL ASSISTANCE	RESIDENTIAL TOU	RESIDENTIAL HEATING	RESIDENTIAL CTRL WATER HEATING	ETS OFF PEAK	SMALL GENERAL SERVICE	MEDIUM GENERAL SERVICE	LARGE GENERAL SERVICE	Total
Purchase-Power-Dept	3,986,494	52,277	20,594	32,724	268,067	-	606,078	1,306,845	2,428,575	8,701,654
Purchase-Power-Energy	3,686,777	50,742	7,847	20,122	222,640	143,564	726,754	1,601,637	2,976,972	9,437,054
Transmission-Dept	30,153	673	61	67	1,877	352	7,146	4,209	4,710	49,249
Transmission-Variable	15,677	226	163	178	1,017	941	2,433	6,284	11,240	38,160
Substation-Variable	249	4	3	3	16	15	39	100	178	606
Substation-Customer-Dept	6,776	134	32	35	428	183	1,430	1,509	2,266	12,792
Distribution-System-Dept	264,914	3,823	2,756	3,012	17,190	15,896	41,122	106,197	189,932	644,842
Distribution-Customer-Dept	183,720	4,453	-	-	11,321	-	47,174	14,047	3,801	264,515
Transformer-Customer-Fixed	42	1	-	-	3	-	11	3	1	60
Meters-Dept	32,915	798	-	-	2,028	-	8,452	2,517	681	47,390
Services-Dept	689,937	16,721	-	-	34,011	-	118,105	17,584	2,855	879,214
Meterreading-Dept	78,286	1,897	-	-	4,824	-	20,102	5,986	1,620	112,715
Billing-Dept	276,417	6,699	-	-	15,937	-	63,363	16,600	4,247	383,262
	9,252,356	138,449	31,456	56,141	579,358	160,950	1,642,209	3,083,517	5,627,078	20,571,514
Non PP/Fuel	1,579,085	35,429	3,015	3,295	88,651	17,386	309,377	175,036	221,531	2,432,806

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Allocator Definitions

Allocator	Description
Billing.wgt	Number of customers adjusted by the time it takes to bill each customer in the class
CP-12	Average of customer peaks with system peaks during each month of the year. (Used to allocate demand related purchase power expenses).
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Off-Peak Energy	Total off-peak energy used by customer class.
On-Peak Energy	Total on-peak energy used by customer class.
Rev	Allocator based on annual revenue from the class.

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Decision Points



Decision Points



Return on Ratebase

Determine what return on ratebase should be in rates

- What is the purpose of a RORB?
- Is a RORB plus depreciation double counting?

Cross Subsidy

Should a rate plan be set to transition all of the rate classes to their cost of service?



Rate Plan

Consider the combined impact on rates of:

- Factoring in a RORB
- Transitioning to COS
- Renewable energy surcharge increases



Comparative Rates

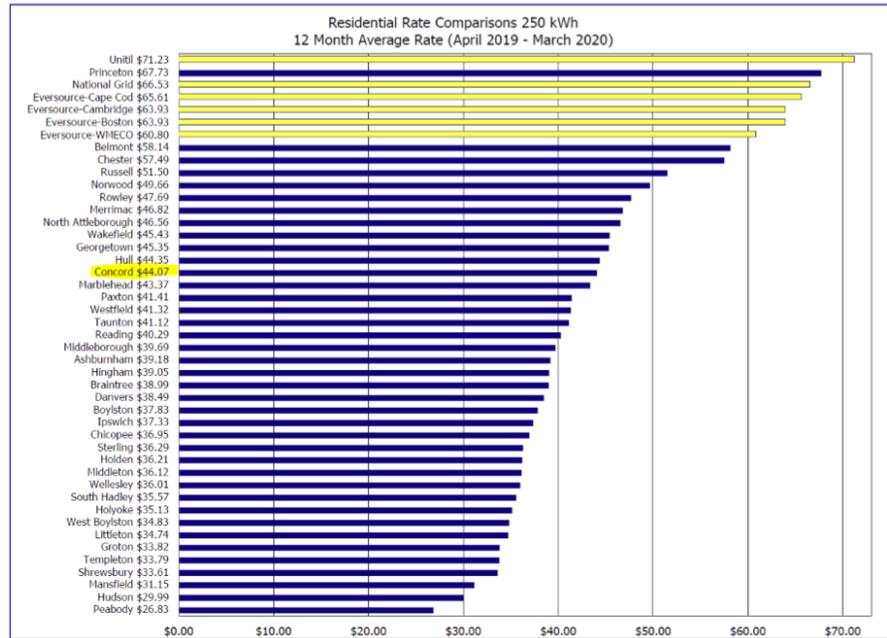
13

Comparative Residential Rates*

60% of MA utilities have residential rates lower than CMLP's

40% have higher residential rates

* Illustrated rate is for the smallest residential customers with less than 250 kWh of usage per month



DISCLAIMER: The information contained in this report has been obtained from various sources. MMWEC does not guarantee the accuracy of this report.

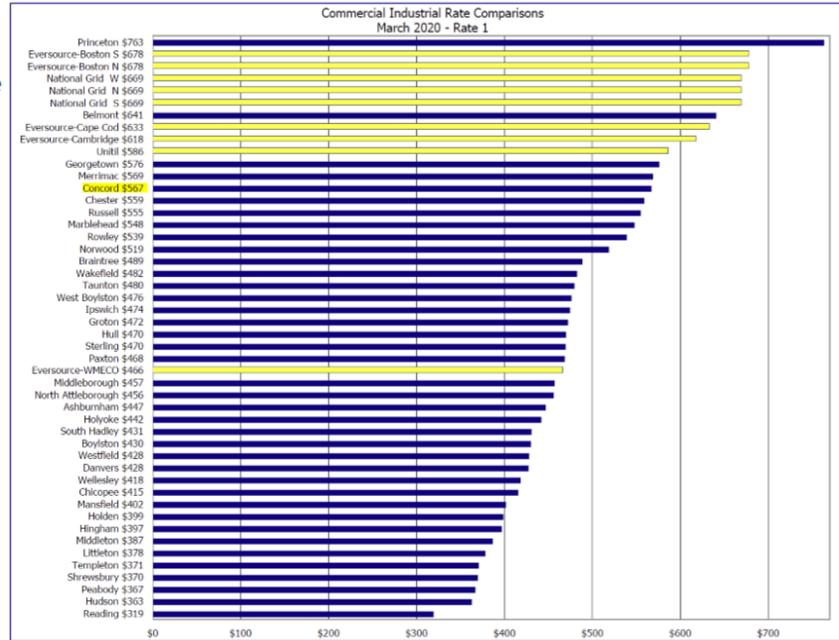
KJL
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Comparative Commercial Rates*

75% of MA utilities have commercial rates lower than CMLP's

25% have higher commercial rates

* illustrated rate is for a small commercial customer with no demand charge and less than 3,000 kWh of usage per month



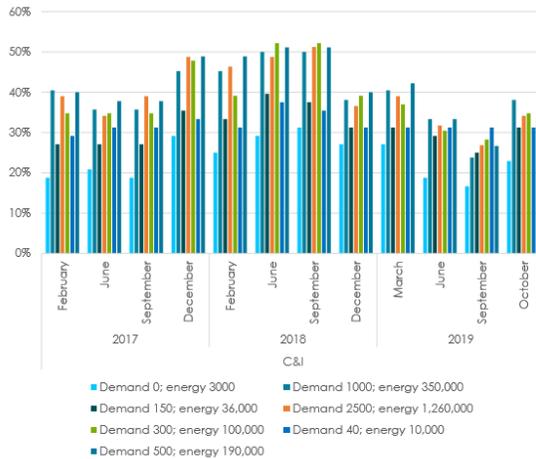
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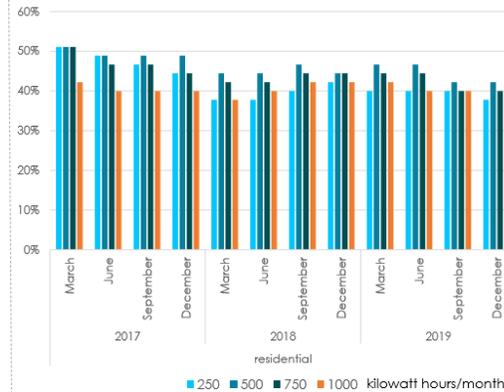
MA Rates



CMLP Percentile Ranking in Massachusetts Commercial & Industrial Rates



CMLP Percentile Ranking in Massachusetts Residential Rates





THANK YOU