

Exhibit I - Historical Overview

1. Creation of Community Power Committee

The Swanzezy Board of Selectmen voted to form a Community Power Committee on March 17, 2021. Below is an excerpt from the minutes of the meeting (full minutes available at

https://www.swanzeynh.gov/government/boards___committees___commissions/agendas___minutes/index.php):

- **Charge for the Community Power Committee**

Bachler explained the goal, which is to create a draft plan to bring to Town Meeting for approval next year. This group would be assisting Bachler. He said five members are proposed and he has two residents already lined up. He described the tasks that the group would have. He asked the Board to approve the Charge as presented. He spoke about the possibility of hiring a consultant to help with the process.

Colby **moved** to adopt the Community Power Committee charge as drafted. There was a second to the motion by Hutwelker and no further discussion. All were in favor. **Motion passed.**

2. Creation of a Draft Plan with public input

The Committee released a Community Power survey to get input on the community goals for the Plan. Swanzezy Community Power survey was available online beginning August 19th, 2021 and published in the Monadnock Shopper News on September 8th. A total of 101 responses were received, 17 returned from the print survey and the rest were completed online.

The Community Power Committee held two public information sessions on September 29th at noon (remote only, and recorded on Zoom), and at 6pm during the regular Selectboard meeting at Whitcomb Hall. The recording and full survey results are posted on the Community Power page of the Town's website. Outreach included facebook posting on the Town's facebook page, public notifications and notices in local newspaper and calendars, posting and email distribution of a flyer, as well as the print survey and associated article in the Monadnock Shopper News.

The consulting team provided a first draft of a Community Power Plan to the Committee that included all required sections for review at the September 16th Committee meeting. The Committee added input and goals, and a second draft was shared at the Committee meeting October 7th. A third draft was reviewed by the Committee on November 4th and they determined the draft Plan was ready for public review.

3. Draft Plan: Public Hearings & Comments

The Draft Plan was posted for public review on the Community Power page of the town's website. Informational flyers were posted and promptly distributed widely, announcing

Program basics and public hearings on November 17th and December 8th. A press release was circulated to local news outlets and appeared in the Sentinel November 15th. The Town Community Power Committee page was updated, and hearing notices posted on social media. The hearings were held during the regularly scheduled time of the Selectboard meetings, and were in person in Whitcomb Hall and also available online through Zoom. Town staff opened the hearing and introduced Committee members and their mission. Representatives of the Consulting Team of Standard Power and Good Energy provided an informational presentation, and then questions from the public and Selectboard were answered. The format of the second hearing was the same, with the addition of charts showing how the Town has saved money on its electricity purchases, and examples of other Community Power programs and their options and costs. The first hearing was covered by the Keene Sentinel, with an article with photo published November 18th, 2021.

4. Approval of Plan by Community Power Committee

The Community Power Committee determined that the Swanzezy Community Power Program as described in the draft Plan will provide benefits to the Swanzezy community, and voted to approve the Swanzezy Community Power Plan December 16th, 2021.

5. Adoption of Plan by Selectboard and Town Meeting

The Board of Selectmen voted to adopt the Community Power Plan on January 5th, 2022. Here is an excerpt from the approved minutes of the meeting (full minutes available at https://www.swanzeynh.gov/government/boards___committees___commissions/agendas___minutes/index.php):

Director of Planning & Economic Development Matthew Bachler – Community Power Plan

The Board considered the adoption of the Community Power Plan as presented. Bachler asked the Board to formally adopt the plan. He said it has been a long effort with public hearings during the year. The committee is asking for the plan to go onto the Warrant in March. Hutwelker asked about the sign-up process. He asked if this is an opt-in program. Bachler said it is an opt-out program, meaning property owners are enrolled unless they take action to opt out. He noted several approvals are necessary before this can go ahead. He said there would be communication with residents about the program. He said residents can opt-out at any time. Hutwelker asked about how we will be notifying the public so that they are not caught unaware of the change. Branley said the electric bill will still come from Eversource. Bachler said there is one line on the bill showing Community Power supplying energy. Bachler said notification to the public would be via direct mailings before the program is implemented. There will also be social media outreach on the Town's website. Branley said it is hard to say as to when the program would be implemented. Bachler said the goal is for the Public Utilities Commission (PUC) process to be sped up. Assuming the PUC approves the plan - the Town puts out a bid for supply, so the Town is always in a position to say "yes" or "no" depending on what response comes in with the bids. Bachler said residents can stay with Eversource for supply if they prefer by opting out.

Colby **moved** to adopt the Community Power Plan as presented by the Community Power Committee and include an article regarding community power on the Town Meeting Warrant. There was a second to the motion by Hutwelker and no further discussion. All were in favor.
Motion passed.

6. Revision of Plan

The Town amended the Plan in October 2022 to better address questions of data security and to incorporate appropriate references to the Public Utility Commission's newly approved Community Power rules (PUC 2200 Municipal and County Aggregation Rules).

7. Submission of Plan to Public Utilities Commission

The Plan was submitted to the Public Utilities Commission and all required parties on 10/21/2022 and assigned the Docket number DE 22-069

<https://www.puc.nh.gov/Regulatory/Docketbk/2022/22-069.html>. Parties were given 21 days to comment on the filing, and Eversource submitted comments that "Eversource has reviewed the Swanzey Plan and found it to be consistent with the Puc Chapter 2200 rules." The PUC has 60 days to rule on a submitted Plan or it automatically takes effect. On 12/19/2022 the Commission approved Swanzey's Community Power Aggregation Plan in Order No. 26,751 without conditions.

8. Adoption of Final Plan by Selectboard

The Select Board voted to approve the Plan as amended and approved by the PUC on 12/21/2022.

Exhibit II - Education & Outreach Plan

1. Initial Outreach and Education

This section refers to outreach following the selection of a Competitive Supplier and prior to Program implementation.

The initial outreach and education will provide a description of the Program for retail electric customers and will be conducted via traditional print and TV channels, social media, the dedicated Community Power Program page on the Town's website, public presentations and personal communications to inform retail electric customers about the Program and will include a toll-free number. This effort will provide specific information about the Program and increase public awareness of the goals of the Program and the upcoming opt-out notification process.

1.1 Media Outreach

Prior to the launch of the Program, the Town will initiate media outreach that may include the use of local cable television shows, newspapers and social media to provide greater public education and to describe the Program, the opt-out process, the informational Program page, and the toll-free telephone number. Outreach may also include public service announcements (PSAs), scheduling interviews of Program spokespersons with local media outlets and securing a positive media presence.

A news release may be distributed to help achieve the aforementioned goals. Follow-up news releases may be used to update the media on the status of the progress of the Program.

1.2 Notices and Public Postings

Brochures/flyers will be distributed in Town offices describing the Program, the opt-out process and the toll-free telephone number in order to further reinforce the Program's details. Brochures/flyers may be placed in key gathering areas or buildings (e.g. library, post office, etc.) which will create the necessary repetition of messages required to motivate customer action and build awareness and understanding.

1.3 Customer Service

The Program will maintain a toll-free telephone number to address retail electric customers' questions regarding the Program, deregulation, the opt-out process, price information and other issues that may arise.

1.4 Community Power Program page on the Town's website

A dedicated Community Power Program page on the Town's website will be maintained by the Program to provide and coordinate customer communications and services. All information regarding the Program will be posted on the Program page including the toll-free number, forms for enrollment, opt-up and opt-out, and links to the websites of

Eversource, the electric distribution utility, the New Hampshire Public Utilities Commission, the Competitive Supplier, and the Consultant for related information and services.

1.5 Public Presentations

Presentations will be provided as needed to municipal officials and to interested community groups.

1.6 Outreach to Persons with Limited English Proficiency or Disabilities

The Program will be consistent with Town policies to provide access to Program materials for all Eligible Customers. Materials will be provided in English, and translation of materials will be provided as such needs are identified to reach communities with limited English proficiency. Outreach efforts will be communicated in print and audio formats to provide access to both the hearing and visually impaired. The Program will also work with local organizations on accessibility issues as needed, see Section 4.D below.

2. Customer Notification Letter

The Customer Notification Letters will be sent via standard mail to the billing address of each retail electric customer per Section IV.b.ii of the Plan. The Program will have two versions of this letter, one for Eligible Customers and one for other customers. The Competitive Supplier shall bear all expenses regarding the Customer Notification Letters.

2.1 Customer Notification Letter for Eligible Customers

Per Section III.b of the Plan, all retail electric customers receiving Default Service supply will be eligible for automatic enrollment in the Program ("Eligible Customers"). The notification envelope will be designed to appear as an official Town communication and it will be clearly marked as containing time sensitive information related to the Program. The notification will contain a letter describing the Program.

The letter will inform Eligible Customers:

- a) about the Program, implications to the Town, and provide information regarding participation and participants responsibilities and rights;
- b) that they have the right to opt-out of the Program without penalty;
- c) of all charges, prominently stated, with a comparison of price and primary terms of the Competitive Supplier and the current Default Service offering;
- d) that any savings under the Program compared to Default Service cannot be guaranteed because the Default Service rate is subject to changes
- e) about the opt-out process; and
- f) in languages other than English for appropriate customer groups (i.e. toll-free telephone number).

The letter will also contain an opt-out reply card with a simple check off and signature

line for eligible customers who do not wish to participate. The envelope will be pre-stamped for return of the opt-out reply card in order to protect customer privacy.

Eligible customers will have 33 days from the date of the mailing to mail back the opt-out card in a pre-addressed postage-paid envelope and the customer notification shall identify the specific date by which the envelopes containing the opt-out card must be postmarked. Automatic enrollment of customers will not start until three days after the date specified for the postmark of the return envelopes to allow for receipt of the opt-out cards prior to the start of automatic enrollments. New Eligible Customers will be enrolled in the Program in accordance with applicable Local Distributor Company rules. Upon initiation of service, these new Eligible Customers will receive the same customer information as all other Eligible Customers.

2.2 Customer Notification Letter for Other Customers

The Customer Notification Letter for other customers will, at a minimum, contain a description of the aggregation Program, the implications to the Town, and instructions for how to enroll in any of the Program products if desired.

3. Opt-Out Period Education & Outreach

After the Customer Notification Letters have been sent, Town will continue its education and outreach to afford residents and businesses the opportunity to learn more and find answers to key questions relating to their decision to opt out or enroll in one of the optional products of the Program. This process will include, at a minimum, a public information meeting within 15 days of the mailing of the Customer Notification Letter. It will also include a similar range of outreach activities as enumerated in section 1.1 to 1.6.

4. Timeline and Preliminary Marketing Plan for Launch

The timeline and preliminary marketing plan identifies the steps the Town may take to inform the community about the Program, as described in Sections 1 through 3. The schedule is designed to work towards the estimated date when the Customer Notification Letter is scheduled to arrive in customer mailboxes. The dates may be adjusted to ensure compliance with the minimum written notification timelines for the date of commencement of service to the Public Utilities Commission, the Office of Consumer Advocate, and the Department of Energy per Puc 2204.04.

The costs and implementation of the Education and Outreach Plan will be handled by the Community Power Consultant, under the direction of the Town.

Proposed Timeline:		
Action	Days before*	Days after*
A. Update Program page and shopping comparison websites	15	Ongoing
B. Work with local media resources	15	30
C. Active social media outreach	15	30
D. Presentations	15	30
E. Distribute marketing materials	15	30
F. Customer help line	15	Ongoing
G. Mail postcard to all Eligible Customers	5	-
H. Customer Notification Letter arrives	0	0
*From estimated date Customer Notification Letter arrives in customer mailboxes		

A. Program page and shopping comparison website update:

Timeframe: A dedicated Community Power Program page on the Town's website will be maintained by the Program to provide all customer communications and services starting on or before 15 days before the estimated date that the Customer Notification Letter arrives in customer mailboxes.

The Program page will be maintained on the Town's website with content provided by the Consultant. After executing an ESA, the Program will update the Program page with a description of the Program and its products, the implications to the Town, and the rights and responsibilities that the participants will have under the Program.

The shopping comparison website is maintained by the Department of Energy to enable consumers to shop for electricity supply products. The Program will post its product information for residential and small commercial customers on the shopping comparison website. Such information will be posted on the website in advance of mailing the Customer Notification Letters.

B. Work with local media resources:

Timeframe: 15 days before to 30 days after the estimated date that the Customer Notification Letter arrives.

Area Newspapers:

The Town will work with area print and online newspapers to disseminate accurate and timely information about the Program. As part of this targeted outreach to these papers, the Town may seek a meeting with the editorial board to establish a good foundation for continued dialogue over the course of the contract. Other newspaper outlets may include other local publications.

- These papers may include: The Keene Sentinel, the Monadnock Shopper News, and the New Hampshire Union Leader.

Local Public Access Television:

The Town may record interviews about the Program and PSAs for upcoming meetings and local broadcast, as available.

Other Television and Radio Stations

Develop press releases to send to other TV stations and radio stations.

- TV stations might include WMUR (ABC, MANCHESTER, NH) Channel 9; WUTF (INDEPENDENT, WORCESTER, MA) Channel 27; WVTM (PBS, WINDSOR, VT) Channel 41; WWJE (INDEPENDENT, DERRY, NH) Channel 50; WEKW (PBS, Swanzey, NH) Channel 52; WNEU (NBC, MERRIMACK, NH) Channel 60;
- Radio stations might include WVBA (88.9 FM) Brattleboro, VT; WEVO (89.1 FM) Concord, NH; WEVN (90.7 FM) Swanzey, NH; WEEY (93.5 FM) Swanzey, NH; WSNI (97.7 FM) Swanzey, NH; WINQ (103.1 FM) Swanzey, NH; WKNE (103.7 FM) Swanzey, NH; WYRY (105.5 FM) Swanzey, NH; WCNL (1010 AM) Newport, NH; WKBK (1290 AM) Swanzey, NH; WTSA (1450 AM) Brattleboro, VT

Municipal Staff Interviews

Develop Q&A Scripts and prepare municipal staff or volunteers for interviews.

C. Active Social Media Outreach

Timeframe: 15 days before to 30 days after the estimated date that the Customer Notification Letter arrives.

Boost traditional media coverage on social media platforms, with the goal of driving traffic to the dedicated Program page of the Town's website.

In concert with the communication leads of the Town, develop a campaign of planned Facebook posts, timed to coincide with important milestones in order to keep ratepayers

informed, particularly those that may not interact with traditional media on a regular basis. Draft content and graphics to accompany the posts, to be made by Town staff.

- These accounts may include: Town of Swanzev Facebook page, Swanzev Recreation Department Facebook page, Whitcomb Hall Facebook page, Mt. Caesar Union Library Facebook page, Stratton Free Library Facebook page.

Monitor various channels such as Facebook for relevant conversations and questions about the Program. Draft responses to comments and questions and utilize social media as a critical tool in engaging with members of the community.

- These accounts may include: Swanzev Community Facebook page

Identify key social media influencers in the Town, including lawmakers, advocates and reporters. Develop a spreadsheet of the email addresses and reach out to them to keep them informed about the Program.

D. Public Presentation

Timeframe: 15 days before to 30 days after the estimated date that the Customer Notification Letter arrives. This will include, as required in RSA 53:E-7, a public information meeting within 15 days of the mailing of the Customer Notification Letter.

Local Groups

Connect with local groups and associations to see if representatives of the Town can participate in an upcoming meeting or offer to host a dedicated event. Seek their assistance in identifying how to best connect with customers with limited-English capabilities or disabilities that may prevent them from accessing Program information.

- Example groups include: neighborhood associations, social service agencies, Business Focus Groups, Rotary, Kiwanis, Lions, Chamber of Commerce.

Reaching the business community is also important. Presenting to the Chamber of Commerce can start this dialogue and lead to additional outreach to and connection with businesses.

Selectboard Meetings

Present or provide materials for the *Selectboard* meetings and any constituent meeting they may have.

E. Distribute marketing materials

Timeframe: 15 days before to 30 days after the estimated date that the customer Notification Letter arrives.

Many groups may have a natural interest in promoting awareness about the Program and can be provided with electronic and hard-copy materials with reference information for the Program.

Distribute materials to key locations such as Municipal Offices and Public Libraries.

F. Customer Help Line

Timeframe: 15 days before the estimated date that the Customer Notification Letter arrives and ongoing thereafter.

Establish customer helplines with the Competitive Supplier and Community Power Consultant to answer customer inquiries.

G. Mail Postcard to Eligible Customers

Timeframe: 5 days before the estimated date that the Customer Notification Letter arrives.

Post Card

Send out to Eligible Customers prior to the Customer Notification Letter. Establishes that there is a community-sponsored Program and increases the likelihood that recipient engages with the more detailed Customer Notification Letter.

H. Customer Notification Letters arrive

Sent to all retail electricity customers. See Section 2 above for details.

5. Ongoing Outreach and Education

The Town intends to continue outreach and education for customers after enrollment in the Program. The costs and implementation will be handled by the Community Power Consultant, under the direction of the Town. These efforts will include:

- **Program impact:** Key metrics relating to cost performance, renewable energy purchases and Program enrollment. Particularly as the Program accomplishments relate to progress towards the Town's ambitious short- and long- term goals for renewable energy and greenhouse gas emission reduction. This will also include the Energy Source Disclosure labels for the electricity supply;
- **Opt up campaigns:** On-going campaigns to recruit participation into its optional product(s) that contain more renewable energy than required by law ("Opt up campaigns"). Increasing participation in these products will serve the Town's goals to expand new renewable energy and reduce greenhouse gas emissions;
- **Customer awareness:** Rights and procedures for Program participants; contact

information for customer inquiries, responses to frequently asked questions, and details regarding the Program's electric supply and renewable attributes.

- **Public input:** As the Program considers changes to further its progress toward a 100% renewable future and other goals, Town will manage outreach to solicit input and feedback from the community.
- **Program changes and evolution:** Any changes in offerings and prices will be posted on the Community Power Program page on the Town's website.

The Program will utilize similar mediums for on-going education and outreach as for the initial launch education and outreach, including but not limited to: social media, traditional media, in-person meetings and presentations, outreach to local groups, video, and mail. Translation of all materials will be provided as necessary to reach communities with limited English proficiency.

Exhibit III: Swanzey Community Power Survey

The Swanzey Community Power Survey was made available on the Community Power page of the Town's website beginning August 19th, 2021, and was published in the Monadnock Shopper News on September 8th. The published deadline for responses was September 17th. 96 responses were received before the deadline, and five additional after the deadline to total 101 responses. Responses were compiled by consultants from Standard Power and Good Energy, and are reported here with implications for Swanzey Community Power.

Swanzey Community Power Survey

This survey was created by the Swanzey Community Power Committee to assess the needs and interests of the community to design our own Community Power program. Community Power allows towns to choose where their electricity comes from on behalf of residents and businesses with the goal of reducing electric bills and increasing independence and energy options. The survey should take about 10 minutes to complete and all responses are anonymous. For more information, please visit the Community Power Committee page on the Town's website: www.swanzeynh.gov. You may also complete it online at surveymonkey.com/r/SwanzeyPower

*** 1. Is your HOME or BUSINESS located in Swanzey? If both, please complete the survey as a resident first, then complete a separate survey for your business.**

☐ Home ☐ Business

Electricity Supply

Eversource is our electric utility, providing emergency services, poles and wires and billing services. This will not change with Community Power. Eversource also provides default electricity supply for most of our community members. This will change with Community Power, but you will always have the choice to stay with Eversource supply.

***2. Who is your electricity supplier? Check your electric bill to see who is your electricity supplier.**

☐ Eversource ☐ I don't know ☐ Other /third party supplier

***3. Why did you stay with Eversource? Select all that apply.**

☐ I didn't know I had a choice to switch
☐ I see no need to look for a different supplier
☐ I tried, but I could not find good rates
☐ I heard it is too risky to switch
☐ Other _____

***4. Why did you choose a supplier other than Eversource? Select all that apply.**

☐ More renewable content
☐ Better rate
☐ Other _____

***5. Do you generate your own electricity onsite with solar panels or another method?**

☐ Yes, with solar panels ☐ No ☐ Other _____

***6. What do you want the Community Power program to bring to Swanzey? Check all that apply:**

☐ Local control of electricity costs
☐ Lower energy bills
☐ Increased local renewable energy
☐ Consumer protections
☐ New electricity choices
☐ Local jobs
☐ Increased knowledge about energy & how to reduce costs
☐ Other _____

***7. Are you interested in adding extra renewable energy in our electricity supply?**

☐ I would like extra renewable energy, if I can still pay about the same I pay today;
☐ I would like extra renewable energy and I am willing to pay a little more than I pay today;
☐ I would like all (100%) renewable energy and I am willing to pay more;
☐ No, I would not like more renewable energy.

***8. We'll want to provide lots of updates about this program. How do you prefer to get updates? Check all that apply.**

☐ Mail
☐ Email: _____
☐ Town website / Facebook
☐ Keene Sentinel
☐ Monadnock Shopper News
☐ Other: _____

Energy Efficiency

Community Power programs can reduce energy costs and emissions. Another really important way to achieve those benefits is energy efficiency.

***9. Have you done an energy audit on your business/home through NHSave or a private contractor? ☐ Yes ☐ No**

***10. Have you implemented any of the following energy efficiency steps at your home or business (check all that apply):**

☐ Improve insulation
☐ Purchase energy efficient appliances
☐ Install LED light bulbs
☐ Install energy efficient windows
☐ Install a programmable thermostat
☐ Other: _____
☐ None of the above

Tell Us About Yourself

To help us ensure a diversity of perspectives that reflects our entire community, please provide the following information. All responses are anonymous.

11. Do you ☐ Own? ☐ Rent?

12. Which best matches your age?

☐ Under 18
☐ 18-40
☐ 41-65
☐ 66+

13. Which best matches your household income level?

☐ Under \$50,000
☐ \$50,000 to \$99,000
☐ 100,000+

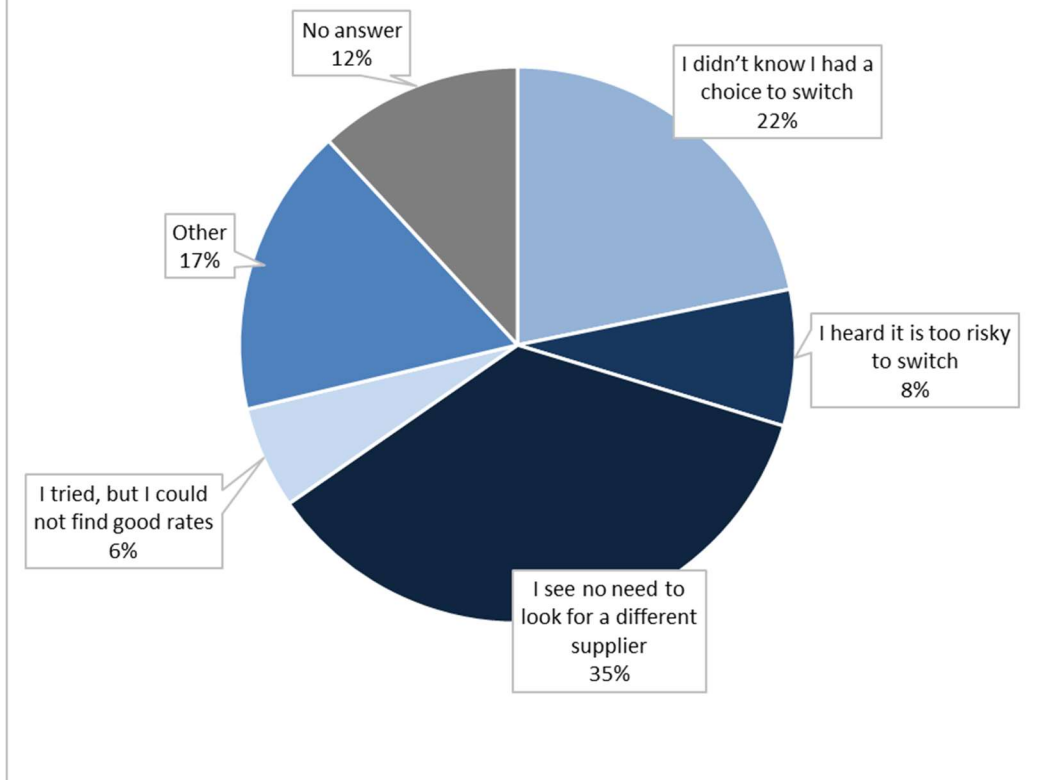
Return the completed survey to
Matthew Bachler, Town of Swanzey
P.O. Box 10009, Swanzey, NH 03446

GoodEnergy Learn about Community Power programs at cp.standardpower.com **STANDARD POWER**

Questions 1 to 5 of the survey asked about community members' current electricity supply. Of the responses, 98 were residential customers and 3 were businesses. A large majority of responses were served by Eversource default electricity supply, 89%. One third of respondents saw no reason to look for an alternative, and almost a quarter didn't know they had a choice. Sixteen respondents provided other reasons or more information, see next page for the comments. In general, comments reflected engagement with reducing energy costs and increasing services through energy choices.

Of the 11 respondents that chose a competitive supplier, eight did so for a better rate, and three wanted more renewable energy than the utility default. Three respondents produce at least a portion of their own electricity using onsite solar panels.

Why did you stay with Eversource?



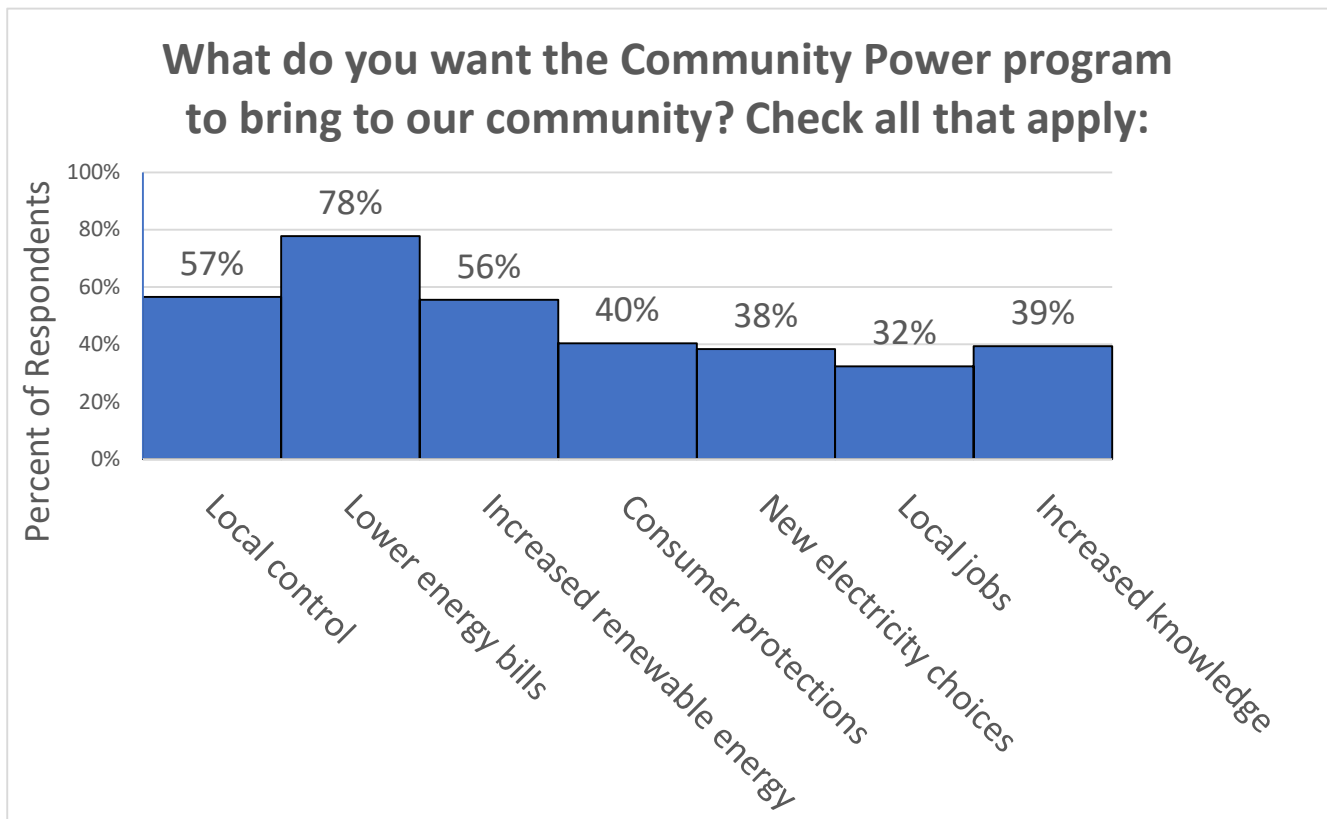
Comments in response to the question: 'Why did you stay with Eversource?':

- Switched back for a better rate
- We did "Switch" to another supplier, then switched back because the other supplier raised their rates higher than Eversource.
- (Eversource is) best responder and repair when power goes out or equipment breaks down. Known entity.
- Concern that Eversource needs to be profitable in order to provide great service to us. Would we be shooting ourselves in the foot to remove that revenue from them?
- We wanted a company with quick responses in an emergency----didn't know the reputation of other companies.
- Was unsure of critical repair response times
- Went to change once, but found out I'd still have to pay Eversource for 'delivery' fee as they own all the lines
- Bills are from Eversource, but electricity from [competitive supplier].
- Seemed like it might be complicated or end up costing me more to switch so I didn't bother investigating
- Rates were short term
- Secondary supplier prices were higher than Eversource
- Channel 9 did have a program item once that showed someone who switched got nailed with exorbitant bills and poor service after a few months. Also, the only alternative supplier from whom we have heard showed what appeared to be negligible savings, plus going with an unknown entity.
- Switching seems like a scam bait and switch scam with low initial offers, then higher rates over time.
- Other companies entice with low rates and then after 6 months they go up.
- Other companies do not honor the electrical discount through Southwest Community Services
- Other choices do NOT honor my discount from SCS

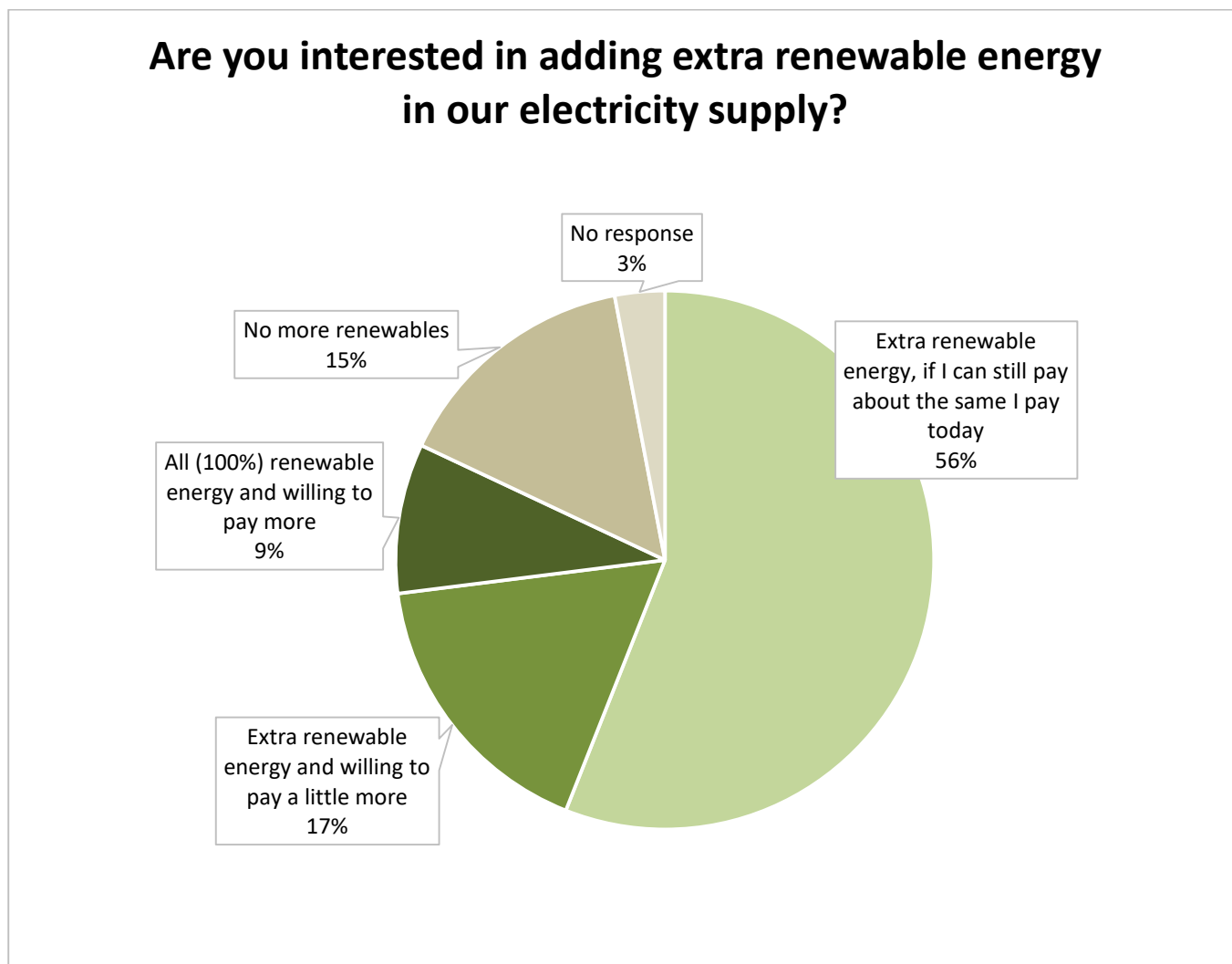
The responses and comments from Questions 2 to 4 indicate engagement with and a certain level of dissatisfaction with current electricity supply choices. Swanzey Community Power can address these concerns by providing supply options with lower costs and more renewables. The utility continues to provide transmission and distribution, critical services, and billing to all customers including those in the Program. Swanzey Community Power:

- Offers customers a choice of a competitive and more stable rate than the utility default rate, two reasons to switch away from utility-provided default supply.
- Does not affect utility profitability. Community Power only affects the supply portion of your bill, which is a pass-through for utilities. The utilities make profits on Transmission and Distribution, which stays with the utility.
- Increases renewable supply in the default for a rate competitive with the utility default rate.
- Community Power contracted rates can be longer than the utility default rates that change every six months.
- Billing stays with the utility. Only the 'Supply' line of the bill will change with Community Power.
- Community Power does not remove customers' ability to choose third-party supply on their own, but does provide superior options to third-party supply for consumer protections (transparent rates with no fine print) and local renewables that impact renewable energy development in our region. Community Power launches with a full outreach campaign, but ultimately the choices fit onto a single postcard.
- The Community Power Program protects and enhances customer programs related to assistance and net metering.

Questions 6 asked about current community knowledge and support for the benefits and goals of Community Power. Support was expressed for each goal, with the strongest support for lower energy bills, local control and increased renewable energy. Swanzey Community Power will increase community knowledge of how a Community Power Program supports each of these benefits.



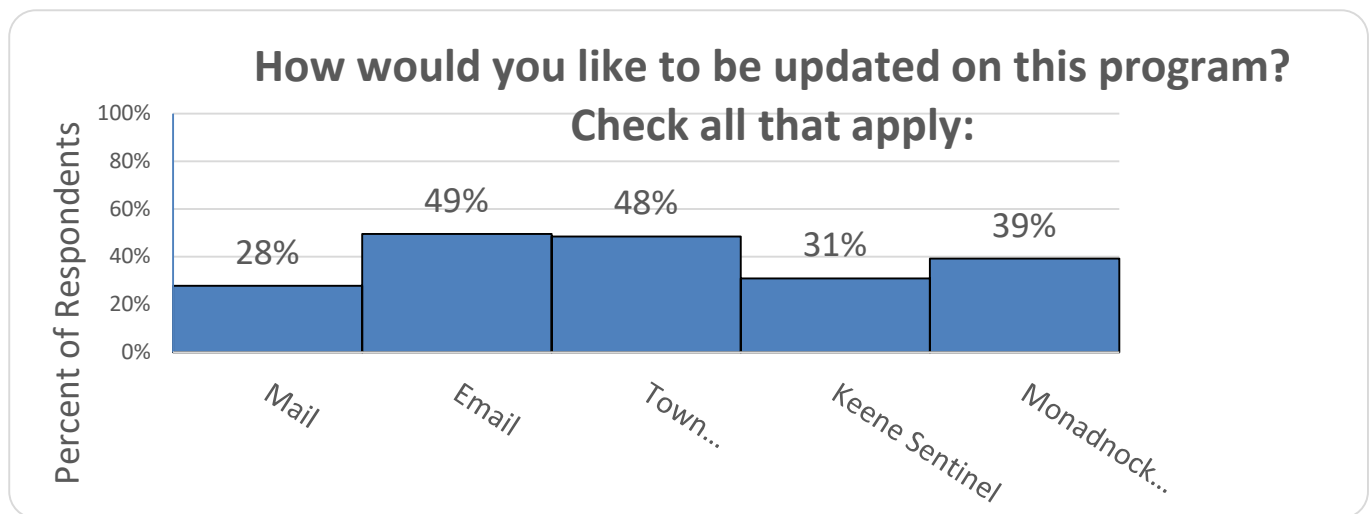
Question 7 of the survey asked about community support for renewable energy in electricity supply above the state minimum, or Renewable Portfolio Standard (RPS). The RPS is currently set at 20% of all electricity consumed in New Hampshire. 82% of respondents supported extra renewables in their energy supply, and 26% said they were willing to pay more for it. 15% responded they did not want more renewable energy.



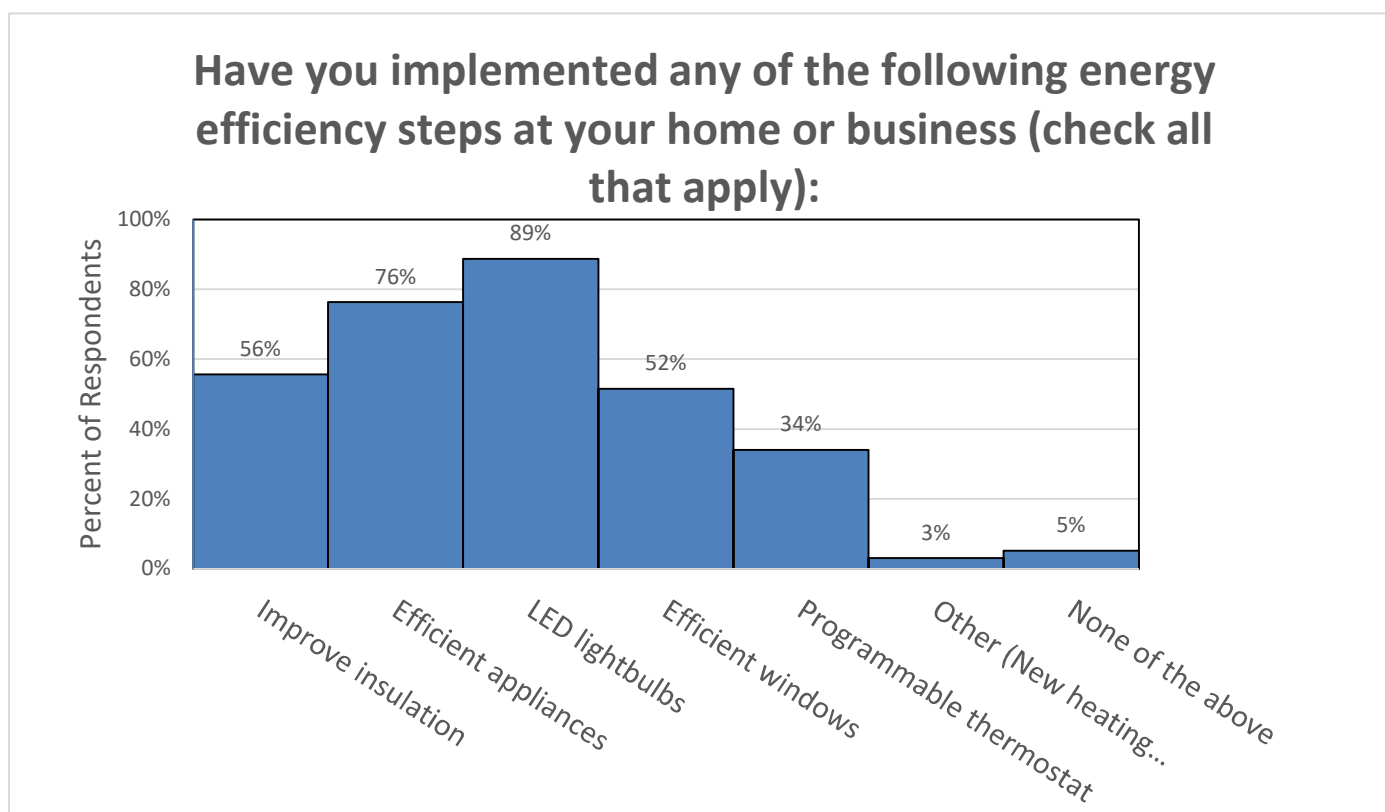
Strong support for renewables in the survey supports a Program default product with additional renewables, as long as the new default rate is competitive with the utility default. The new default product is the option most customers will choose or otherwise be automatically enrolled into, unless they choose another option or opt out of the program altogether.

These survey results also support options for less and more renewables. A lowest cost option, as echoed in the response to Question 6, for community members who need maximum cost savings or feel that the current RPS is sufficient renewable energy. More renewable energy options are also strongly indicated, up to 100% for individual customers, which when chosen also has the effect to increase the overall renewable energy impact of the Program.

Question 8 asked about communications and program updates. The dedicated Community Power page on the Town’s website is the principal means of updating and providing Program details. It will be supplemented with printed and posted notices, flyers, informational meetings and presentations, social campaigns, emails to community members requesting email contact and direct mail to all eligible customers.

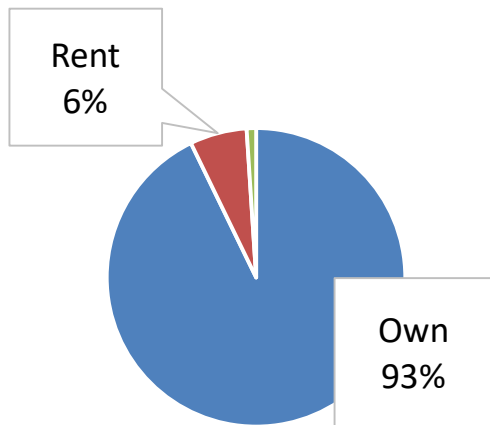


Questions 9 and 10 asked about awareness and use of Energy Efficiency as a means to reduce energy use and costs compatible with Community Power. A small minority, 12%, of respondents have done an energy audit on their home or business through the utility sponsored NHSaves program or privately, but many have implemented efficiency measures, especially LED lighting and efficient appliances.

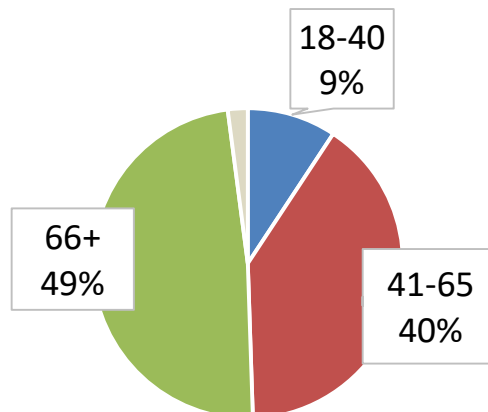


Questions 11 to 13 asked three demographic questions to ensure the Survey was being seen by a wide variety of stakeholders. Multiple responses from each category, rent/own, age and household income were received.

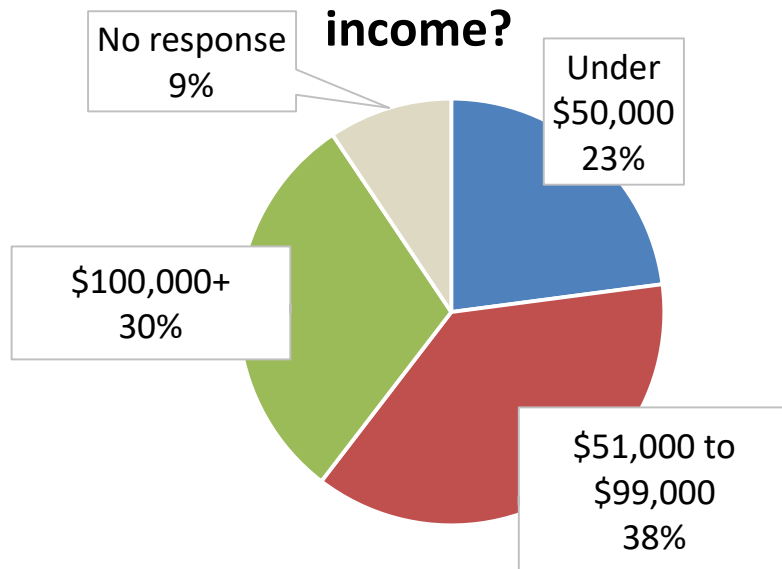
Do you rent or own?



Which best matches your age?



Which best matches your household income?



Swansey Community Power can provide attractive options for Swansey community members of diverse backgrounds and opinions, including renters and landlords, low-income customers, customers who do not want additional renewable energy as well as those that want more renewables up to 100% local renewable energy supply.

Exhibit IV - Data Protection Plan

I. Introduction

The Town of Swanzev (the “Municipality”) is developing a Community Power program (the “Program”), pursuant to RSA 53-E. A municipality that implements such a program is known as an aggregator (“Aggregator”). RSA 363:38 and PUC 2004.19 require that service providers, including Aggregators, protect individual and confidential customer data (“Individual Customer Data”). Individual Customer Data, as defined in RSA 363:38 and expanded in PUC 2004.19, means information that is collected as part of providing electric services to a customer that can identify, singly or in combination, that specific customer, and includes the customer name, address, and account number and the quantity, characteristics, or time of consumption by the customer, and also includes specific customer payment, financial, banking, and credit information. Further, Aggregators must only use Individual Customer Data for the Program’s primary purpose, which may include 1) providing or billing for electric service, 2) meeting electric system, electric grid, or other operational needs, and 3) researching, developing and implementing new rate structures or demand response, customer assistance, energy management or energy efficiency programs. The Municipality’s aggregation consultants, Good Energy and Standard Power, have developed this Data Protection Plan to ensure that Individual Customer Data obtained as part of operation of the Program will be protected from disclosure and/or inappropriate use.

II. Elements of the Plan

1. Access to Customer Data

As part of the Program, Good Energy, Standard Power, local designees of the Municipality, and competitive electricity suppliers (“Suppliers”) selected to provide electricity for the Program (collectively, “Data Administrators”) will receive access to certain information on file with a customer’s local distribution company (“LDC” or “electric distribution utility”), including, among other things, the customer’s name, mailing address, and energy usage history (“Customer Data”). In particular, depending on the status of implementation of the Program, LDC’s may provide four types of Customer Data to Data Administrators: a) aggregated customer data, b) eligible customer data, c) retail electric customer contact information, and d) enrolled customer information. Each type of Customer Data is described more fully below.

- a. Aggregated Customer Data – contains certain information for all electric customers within a municipality, aggregated by rate class or other grouping. This may include data such as the number of customers by rate class, counts of customers participating in net energy metering by rate class, counts of customers

participating in electric assistance program by rate class, the aggregated energy (kWh) for electricity consumption by month for the past 12 months or more by rate class, and revenue, receipts and past-due accounts receivable.

b. Eligible Customer Data – contains certain information for each electricity customer currently receiving utility-provided default service within a municipality. This may include data such as capacity tags for current, prior and next power years, energy (kWh) for electricity consumption for the past 12 months or more, meter reading cycle, whether customer net meters and under which terms, and group net metering data including whether customer is a group net metering host or member of a net metering group, whether a group net metering customer-generator operates as a low-moderate income community solar project, the size of any such net metered generation and the year and month it was placed into service.

c. Retail Electric Customer Contact Information – comprises certain customer contact information for the provision of Program communications, such as Customer Notification Letters to retail electric customers. This may include such data as the customer of record's name, mailing address, account number, meter number, rate class, and email address.

d. Enrolled Customer Data – contains certain information for all individual customers who elected not to opt-out of the Program during the opt-out period. This may include such data as Name of customer and customer contact, Mailing address, Service address, Account number and related meter numbers, Name key, Contact information such as phone numbers, email address, Billing account number, Preferred billing and communication method, Billing cycle, Meter read date or cycle, Form or type of meter reading, Capacity tag information for past two years, current power year and forecasted next power year, Most recent 24 months of usage data, Current and historic status of net metering, distributed generation, Preferred billing and communication method, payment plans and electric assistance program participation, and Rate class.

2. Data Security

All Customer Data that is not anonymized (i.e. presented or aggregated in such a way that removes information that can be used to identify the individual customer that it pertains to, such that it does not constitute individual customer data as defined by RSA 363:37, I or PUC 2002.09) shall be considered Individual Customer Data.

Data Administrators will utilize industry standard physical, technical, and administrative controls and procedures to safeguard Individual Customer Data collected as part of the Program and to prevent unauthorized or accidental access, destruction, loss, alteration, or disclosure of, to protect against anticipated threats or

hazards to the security, confidentiality, or integrity of, and to permit only the appropriate use of, such customer information.

To protect the confidentiality, integrity, and availability of Individual Customer Data, Data Administrators will utilize a variety of industry standard physical and logical access controls, firewalls, password protections, intrusion detection/prevention systems, network and database monitoring, and backup systems. These systems will be designed to cover all networks, servers, computers, notebooks, laptops, PDAs, mobile phones, or other devices that contain Individual Customer Data, or through which Individual Customer Data is made available.

Data Administrators will limit access to Individual Customer Data to those persons and entities having a specific business purpose for maintaining and processing such information. Those granted access to Individual Customer Data will be trained on their responsibilities to protect the confidentiality, integrity, and availability of such information.

Data Administrators will work cooperatively with the LDC(s), as necessary, to implement this Data Protection Plan, and will at a minimum, implement the following actions:

- a. Conduct a risk assessment to identify and assess reasonably foreseeable internal and external risks to the security, confidentiality, and integrity of electronic, paper, and other records containing Individual Customer Data and evaluate and improve, where necessary, the effectiveness of their safeguards for limiting those internal and external risks;
- b. Timely notify the LDC(s) of any important modifications of this Data Protection Plan within a reasonable amount of time;
- c. Review and, as appropriate, revise this Data Protection Plan: (i) at least annually or whenever there is a material change in their business practices that may reasonably affect the security or integrity of Customer Data; (ii) in accordance with prevailing industry practices and applicable law; and (iii) as reasonably requested by the LDC(s). If the Data Administrators modify this Data Protection Plan following such a review, the Data Administrators will promptly notify the LDC(s) of such modifications and will provide the modifications to the LDC(s) in writing upon a LDC's request. The Data Administrators will at no time alter or modify this Data Protection Plan in such a way that will weaken or compromise the confidentiality, security, or integrity of Individual Customer Data;
- d. Maintain and enforce this Data Protection Plan in all locations where Individual Customer Data is processed by the Data Administrators;
- e. Conduct security testing using a third party to provide monitoring penetration and intrusion testing with respect to Data Administrators systems and promptly provide a copy of the results to the LDC(s), provided that the third party may redact IP addresses and other client names and information;

- f. Provide annual security awareness training to all individuals having access to Individual Customer Data and maintain a record of such training; and
- g. Implement a standard process for identifying, assessing, and mitigating security risks.

3. Confidentiality

Data Administrators will not sell Individual Customer Data to others unless such sale is specifically authorized by the customer, or is required by law or court order. Data Administrators will not share, disclose, or provide Individual Customer Data to others, including their affiliates, unless such disclosure, or provision is required to operate the Program (i.e., the Program's "primary purpose", per RSA 363:38), is specifically authorized by the customer, or is required by law or court order. If Data Administrators request customer authorization to disclose Individual Customer Data, Data Administrators will first describe to the customer the information they intend to release and provide details concerning the recipient of such information.

Data Administrators will hold all Customer Data in strict confidence and except as otherwise needed for provision of the Program, required by law, or permitted as below, (a) not disclose Individual Customer Data to any other person or entity (including but not limited to Suppliers, subcontractors, and affiliates or members of Good Energy and Standard Power); (b) not process Individual Customer Data outside of the United States; (c) not process Individual Customer Data other than in connection with the Program; (d) not process Individual Customer Data for any marketing purposes other than in connection with the Program; (e) limit reproduction of Individual Customer Data to the extent required for the Program; (f) store Individual Customer Data in a secure fashion at a secure location in the United States that is not accessible to any person or entity not authorized to receive the Individual Customer Data; and (g) otherwise use at least the same degree of care to avoid publication or dissemination of the Individual Customer Data as Data Administrators employ (or would employ) with respect to their own confidential information that they do not (or would not) desire to have published or disseminated, but in no event less than reasonable care.

4. Disclosure of Individual Customer Data

Notwithstanding the provisions of Section 3 above, the Data Administrators may disclose Individual Customer Data to their representatives who have a legitimate need to know or use such Individual Customer Data for the sole and limited purposes of administering and/or conducting the Program. Such representatives will first be advised of the sensitive and confidential nature of such Individual Customer Data and agree to comply with the provisions of this Data Protection Plan. Pursuant to PUC 200.19, Data Administrators may also provide Individual Customer Data to third parties for the purposes of 1) billing for electric service, 2) meeting electric system, electric grid, or other operational needs, and 3) implementing demand response, customer assistance, energy management or energy efficiency programs. Any such third parties will be required by contract to comply with the provisions of this Data Protection Plan.

In the event that Data Administrators or any of their representatives receive notice that they have, will, or may become compelled, pursuant to applicable law or regulation or legal process, to disclose any Individual Customer Data (whether by receipt of oral questions, interrogatories, requests for information or documents in legal proceedings, subpoenas, civil investigative demands, other similar processes or otherwise), Data Administrators will, except to the extent prohibited by law, immediately notify the LDC(s), orally and in writing, of the pending or threatened compulsion. To the extent lawfully allowable, the LDC(s) will have the right to consult with the Data Administrators and the parties will cooperate, in advance of any disclosure, to undertake any lawfully permissible steps to reduce and/or minimize the extent of Individual Customer Data that must be disclosed. The LDC(s) will also have the right to seek an appropriate protective order or other remedy reducing and/or minimizing the extent of Individual Customer Data that must be disclosed.

Data Administrators and their representatives will disclose only such Individual Customer Data which they are advised by legal counsel that they are legally required to disclose in order to comply with such applicable law or regulation or legal process (as such may be affected by any protective order or other remedy obtained by LDC) and Data Administrators and their representatives will use all reasonable efforts to ensure that all Individual Customer Data that is so disclosed will be accorded confidential treatment.

5. Return/Destruction of Individual Customer Data

Upon the expiration of the Program, or as otherwise required by law or Commission order, the Data Administrators will destroy all copies of any Individual Customer Data (including any and all extracts, compilations, studies or other documents based upon, derived from or containing Individual Customer Data) within their or their representatives' possession (including destroying Individual Customer Data from all systems, records, archives and backups), and all subsequent use and processing of the Individual Customer Data by the Data Administrators and their representatives will cease.

Notwithstanding the foregoing, the Data Administrators and their representatives will not erase Individual Customer Data contained in an archived computer system backup maintained in accordance with their respective security or disaster recovery procedures. The Data Administrators will not provide access to or recovery of Individual Customer Data from such computer backup system and will keep all such Individual Customer Data confidential in accordance with this Data Protection Plan.

6. Data Security Incidents

The Data Administrators are responsible for any and all security incidents involving Individual Customer Data that is processed as part of the Program. The Data Administrators will notify the LDC(s) in writing immediately (and in any event within twenty-four (24) hours) whenever the Data Administrators reasonably believe that there

has been a data security incident involving Individual Customer Data. After providing such notice, the Data Administrators will investigate the incident, and immediately take all necessary steps to eliminate or contain any exposure of Individual Customer Data. The Data Administrators will provide the LDC(s) with reasonable assistance and cooperation in the furtherance of any correction, remediation, or investigation of any such data security incidents and/or the mitigation of any damage, including any notification required by law or that LDC(s) may determine appropriate to send to individuals impacted or potentially impacted by such data security incident(s), and/or the provision of any credit reporting service required by law or that LDC(s) deems appropriate to provide to such individuals.

Unless required by law, the Data Administrators will not notify any individual or any third party other than law enforcement of any potential data security incidents involving Individual Customer Data without first consulting with, and obtaining the permission of, the LDC(s). Within 30 days of identifying or being informed of a data security incident, the Data Administrators will develop and execute a plan, with the cooperation of the LDC(s), which reduces the likelihood of a recurrence of such data security incident(s).

7. Additional Protections

The Data Administrators will comply with all applicable privacy and security laws to which it is subject, including this Data Protection Plan.

The Data Administrators will safely secure and/or encrypt all Individual Customer Data during storage and transmission.

The Data Administrators will have in place appropriate and reasonable processes and systems, including this Data Protection Plan, to protect the security of Individual Customer Data and to prevent a data security incident, including, without limitation, a breach resulting from or arising out of the Data Administrators' internal use, processing, or other transmission of Individual Customer Data, whether between or among their representatives, subsidiaries and affiliates, or any other person or entity acting on behalf of the Data Administrators.

The Data Administrators will work cooperatively with the LDC(s) to implement this Data Protection Plan, including: establishing policies and procedures to provide reasonable and prompt assistance to LDC(s) in responding to any and all requests, complaints, or other communications received from any individual who is or may be the subject of a data security incident involving Customer Data to the extent such request, complaint or other communication relates to the Data Administrators' processing of such individual's Individual Customer Data; and establishing policies and procedures to provide all reasonable and prompt assistance to LDC(s) in responding to any and all requests, complaints, or other communications received from any individual, government, government agency, regulatory authority, or other entity that is or may have an interest in the Individual Customer Data, data theft or other

unauthorized release of Individual Customer Data, disclosure of Individual Customer Data, or misuse of Individual Customer Data to the extent such request, complaint or other communication relates to Data Administrators' processing of such individual's Individual Customer Data.

8. Use of Individual Customer Data

The Data Administrators will only use Individual Customer Data for the primary purposes, as defined in RSA 363:37, which may include 1) providing or billing for electric service, 2) meeting electric system, electric grid, or other operational needs, and 3) researching, developing and implementing new rate structures or demand response, customer assistance, energy management or energy efficiency programs.

II. Conclusion

The Data Protection Plan meets all of the requirements of RSA 363:38, RSA 363:37 and PUC 2004.19.