

Exhibit I - Historical Overview

1. Creation of Community Power Aggregation Committee

The Town of Milford began to explore Community Power for Town residents and small businesses soon after the Community Power law passed in October of 2019. The Town Administrator scheduled meetings with possible service providers as early as March 2020. Over the ensuing months, the Town followed Community Power as it made its way through the legislative (HB 315) and regulatory (2200 rules) process, receiving periodic updates from the Town’s energy broker Standard Power (Community Power presentations scheduled 3/4/2020 and 9/22/2021) and also from other potential service providers. Final rules for Community Power were adopted at the Public Utilities Commission on July 27, 2022, and finalized through the Joint Legislative process in October 2022.

Following a vetting process of potential vendors, the team of Standard Power and Good Energy was chosen based on their experience with municipal aggregation across New England and their ability to help the Committee present a Plan to the Milford Community in time for a vote at Town Meeting in 2023. The first official meeting with this team was September 6, 2022, and the Board of Selectmen signed an MOU for their services on November 7th at no cost or obligation to the Town. The team recommended the commission of a formal Community Power Committee and the Board of Selectmen chartered the Milford Energy Advisory Committee as the Milford Community Power Committee under RSA 53-E on 12 December 2022. Below is a screenshot of the motion recorded in the meeting minutes (draft).

287 Chairman Dargie made a motion to appoint all members of the Milford Energy Advisory Committee to also be
288 members of the Milford Community Power Committee which is a sub-committee with memberships concurrent on
289 both committees. Seconded by Selectman Daniels. All were in favor. The motion passed 5/0.

2. Creation of a Draft Plan with public hearings

The Committee is working with consultants from Standard Power to develop the Milford Community Power Plan with public input. The draft Plan is based on best practices and municipal aggregation plans prepared by Standard Power with partner Good Energy, who has 60 active municipal aggregations in New England with goals of cost savings and more renewable energy. The draft Plan requires no commitment by the Town until program rates are known and favorable compared to the utility default rates, giving the Town and community time to fully understand the program prior to launch. The draft Plan was released on the Community Power page on the Town website along with a community survey on January 4, 2023, and was widely advertised, 500 flyers hand circulated throughout the Town including several visits to the recycling center, posters posted around town, and also social media posts on the Milford resident facebook page. Public hearings were held and recorded on 1/12/23 at 5pm at the police department community meeting room and 1/16/23 at 5:30 pm in the Board of Selectmen’s chambers. The survey received 124 responses. Results of the survey are reported in the Plan on page 3 and full results are attached as **Exhibit IV**.

Below are summarized responses to four concerns received regarding the Plan. Favorable comments are not reported here. The Committee continues to engage with the public during public meetings or any way they wish to reach out to have their concerns addressed and their questions answered.

1. ‘The program should be entirely opt-in, customers should have to choose to be part of it, not automatically enrolled.’

We currently have a fully opt-in system. An opt-out Community Power program allows for greater savings and consumer protections. The proposed program remains opt-in for customers who are currently on competitive supply. These customers are not eligible for automatic enrollment in the program, but they can choose to opt in. The program provides a new default supply for customers currently on the utility default plus optional choices, while allowing customers to return to the utility default any time including before the program starts.

2. ‘Customers should not be automatically enrolled.’

Currently Eversource provides default service for customers, and it does so through purchase of contracts with competitive suppliers, on a rigid six-month schedule. Community Power (Municipal aggregation) programs provide a new default service for customers that is not bound by the same rigid purchasing schedule, providing opportunity for better rates for default service customers. The program does not launch unless the program default is lower than the utility default rate.

3. ‘Milford is rushing the process.’

Milford vetted its service providers for experience and quality of services delivered in New Hampshire and other New England communities. In addition to working with an experienced service provider, the currently high utility rates provide the opportunity for material savings for customers. Passing a Plan in 2023 preserves the option to launch a program in 2023 against historically high utility default rates of 20-22 cents/kWh, but it does not compel the Town to do so. The Plan has extensive outreach following Town approval and prior to program launch to ensure all eligible and other customers are fully aware of the program and their choices prior to program launch.

4. ‘The program doesn’t involve the School District’

Like all electricity customers in Milford that are on competitive supply, the Town municipal buildings and the School District will not be automatically enrolled in the program, but can opt-in, if and when they deem it favorable to do so.

3. Approval of Plan by Community Power Aggregation Committee

The Plan was approved by the Committee on February 9, 2023.

4. Adoption of Plan by Board of Selectmen and Town Meeting

The Plan was approved by the Board of Selectmen on February 27, 2023. The Town of Milford is an SB2 Town, with ballot voting on March 14, 2023.

5. Submission of Final Plan to Public Utilities Commission

The Plan was submitted to the PUC in March 2023.

Exhibit II - Education & Outreach Plan

The following describes the Town’s Education & Outreach plan to fully inform and educate potential participants about their opportunities, options and rights for participation in the Program.

The costs and implementation of the Education/Outreach Plan will be handled by the Community Power Consultant, under the direction of the Board of Selectmen or their designee.

1. Program Launch

The Town has prepared a preliminary marketing plan and timeline that identifies the steps the Town may take to implement the broad-based public education efforts and send out the opt-out notification (“Customer Notification Documents”). The schedule is designed to work towards the estimated date when the Customer Notification Documents are scheduled to arrive in retail electric customer’s mailboxes.

Action	From estimated date Customer Notification Documents arrive in customer mailboxes	
	Days before	Days after
A. Create or Update Webpage and shopping comparison websites	15	-
B. Work with local media resources	15	30
C. Active social media outreach	15	30
D. Initial person presentations	15	30
E. Distribute marketing materials	15	30
F. Customer help line	15	Ongoing
G. Mail postcard to all retail electric customers	5	-
H. Customer Notification Letters arrive	0	0

1.A. Create or Update Webpage and shopping comparison websites

Timeframe: Shortly after signing the ESA (~15 days before the estimated date that the Customer Notification Documents arrive).

The Program will maintain an informational webpage with features that include Program details, an online savings calculator and enrollment, opt-up and opt-out forms for the convenience of participants.

The Program page will be maintained on the Town’s website. 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.

1.B. Press Release and Work with Local Media Resources

Timeframe: 15 days before to 30 days after the estimated date that the Customer Notification Documents arrive.

The Town will develop press releases to provide to local media resources, including newspapers and public access TV

- Area Newspapers: The Town will work with the Milford Cabinet and the Monadnock Ledger-Transcript 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.
- Local Public Access Television: The Town Board of Selectmen meetings are broadcast. Town may choose to record presentations about the program and PSAs for upcoming meetings.
- Municipal Staff Interviews: Develop Q&A Scripts and prepare municipal staff or volunteers for interviews.

1.C. Active Social Media Outreach

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

Boost all traditional media coverage on social media platforms, with the goal of driving traffic to the Program webpage . In concert with the communication leads of the Town, develop a campaign of planned tweets and 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:
<https://www.facebook.com/groups/Milford.03055/>.

Monitor various channels such as Facebook and Instagram 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.

1.D. Public Presentation

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

- *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.

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

- *Board of Selectmen Meetings*: Present or provide materials for the Board of Selectmen meetings and any constituent meeting they may have.

1.E. Distribute marketing materials

Timeframe: 15 days before to 30 days after the estimated date that the Customer Notification Documents arrive.

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 in key locations, such as Municipal Offices and Public Library.

1.F. Customer Help Line

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

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

1.G. Mail Postcard to all Eligible Customers

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

A postcard with municipal branding establishes that there is a community-sponsored Program and increases the likelihood that recipient engages with the more detailed Customer Notification Documents.

1.H. Customer Notification Letters arrive

The Customer Notification Letters will be sent via standard mail to the billing address of each retail electric customer per **Section VI.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.

1.H.i. 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.

1.H.ii. 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.

2. 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, responsibilities 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:** The Town will solicit input and feedback from the community regarding the program periodically and when considering changes to the program.
 - **Program changes and evolution:** Any changes in offerings and prices, which will be posted on the Community Power page on the Town 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.

3. Approach to Overall Education & Outreach

3.1 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. 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 1.D**, above.

Exhibit III - Data Protection Plan

I. Introduction

The Town of Milford (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.

Exhibit IV - Milford Community Survey Results

The Milford Community Power Survey was made available on the Community Power page of the Town's website from January 4 to February 9, 2023, shared on Facebook, and circulated as 500 flyers and 20 posters at the Transfer Station, Town offices and the library. 124 responses were received. Responses were compiled by consultants from Standard Power and Good Energy, and are reported here, with implications for Milford Community Power.

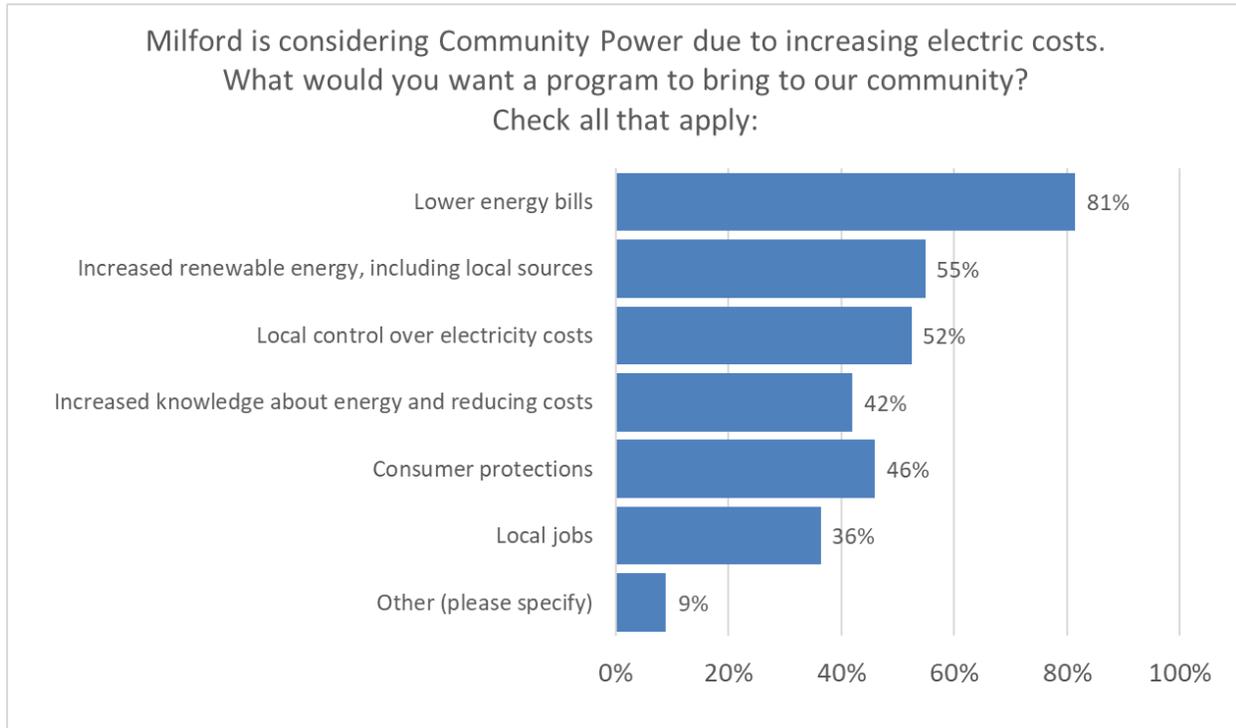
Questions 1 to 5 of the survey asked about community members' current electricity supply. Of the responses, 122 were residential customers and 2 were businesses. Two-thirds of respondents were served by Eversource default electricity supply, 65%, with 35% reporting the use of other (competitive) supply. Two did not respond to this question. A third of Eversource customers didn't know they had a choice of electricity supply, 32% and 25% saw no reason to switch. 17 respondents provided other reasons or more information, *see below for the comments*.

reliability
Lazy, but plan to switch
Comfortable with Eversource
Alternate suppliers bring more trouble than savings. Start off with a deal price then come back with big increases. Countless direct sales programs have tried this only to close shop after a short period.
already have 3rd party supplier
Lazy & risk of making incorrect decision
3rd party wouldn't work with my solar panels
The 3rd party didn't want to work with my solar panels
Thought I had changed
Lack of motivation
Haven't had time to look into new suppliers
Eversource is established and other supplies did not offer good enough deal to offset the uncertainty of using them. Additionally, I did not like the aggressive and questionable way other supplies approached the subject of changing from Eversource.
We have a mobile home, and being such a small space, we didn't feel it would be beneficial
Just haven't investigated the other sources of power, yet.
Thought that if I switched and there was an outage that it would take longer to get power restored.
Haven't switched yet but would be interested in doing so given the current rates!
not clear what options are

In general, comments reflect significant engagement with reducing energy costs and increasing services through energy choices. One clarification is that reliability, emergency response and billing are always Eversource's responsibility, no matter who is supplying the power, including a Community Power program.

Of the 41 respondents that chose a competitive supplier, 100% did so for a better rate, and four wanted more renewable energy than the utility default. 8% of respondents produce at least a portion of their own electricity using onsite solar panels.

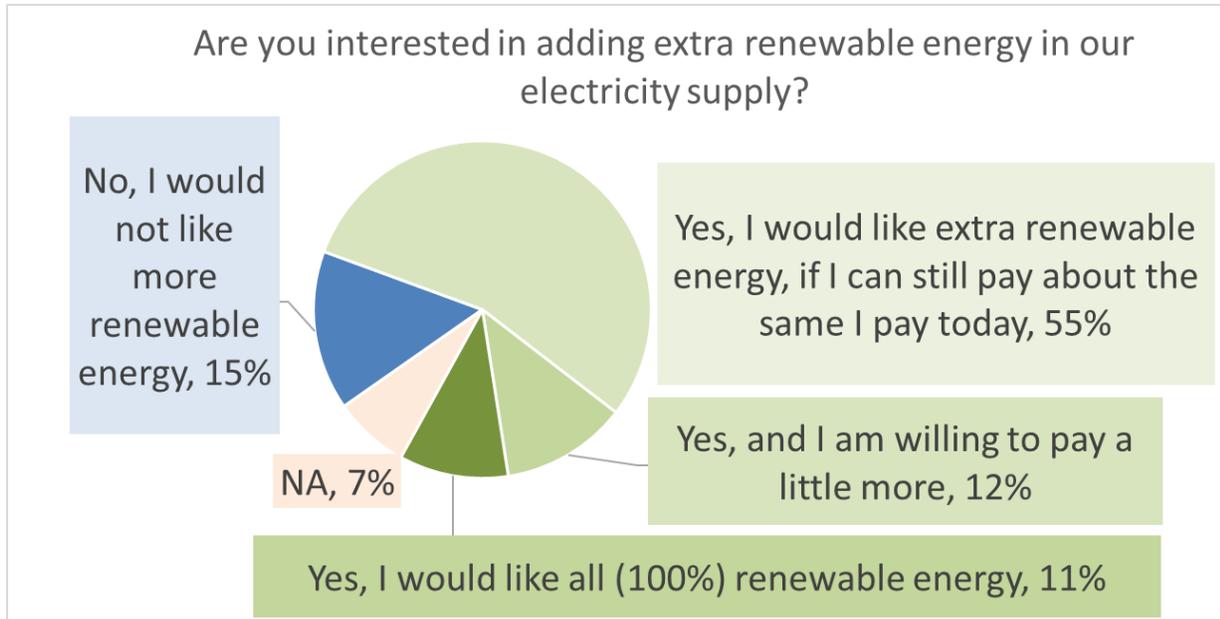
Questions 6 asked about current community knowledge and support for the benefits and goals of Community Power. Support was expressed for each goal, with the strongest support for lower energy bills, increased renewable energy including local sources, and local control. Milford Community Power will increase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



Many comments were received throughout the survey. These are in response to the ‘other’ prompt in Question 6, seven supporting similar goals, one supporting staying with Eversource and one disagreeing with a program:

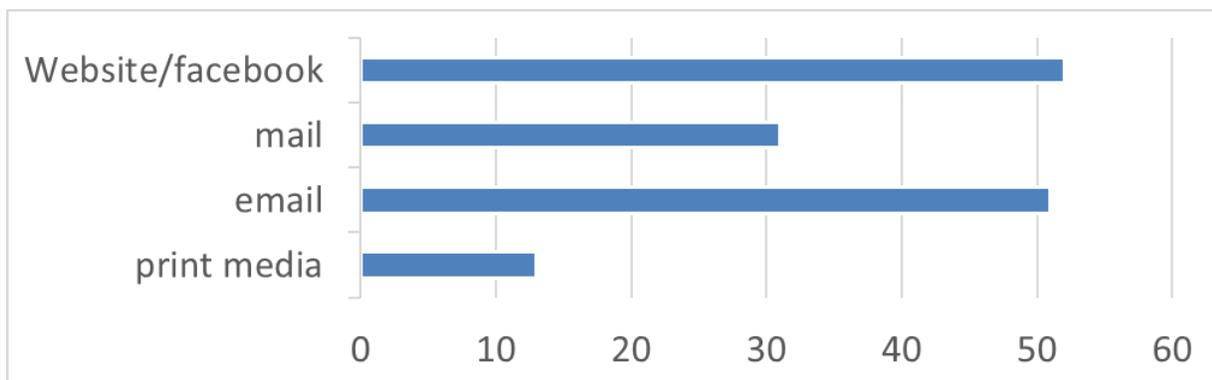
- We would need a true alternative supplier choice not just a consolidator program.
- Would like energy independence
- Energy Independence
- Eversource has provided good service
- Locally owned, more reliable
- Net metering
- I don’t agree with this
- More knowledge on future plans around energy production and prices
- Assist Milford’s residents via volunteers to institute super insulation and conservation plus SOLAR.

Question 7 of the survey asked about community support for renewable energy in electricity supply above the state minimum, or Renewable Portfolio Standard (RPS). In 2022, the RPS was 22.5% of all electricity consumed in New Hampshire. 78% of respondents said they want more renewable energy in our electricity supply, with 23% saying they are willing to pay more for it and 55% saying they would like more if they paid about the same as they do today. 15% responded that do not want more renewable energy. 11% of Milford respondents want 100% renewable energy. This result shows very strong support for renewable energy, including in the default product choice as long as it is competitive with the utility default rate.

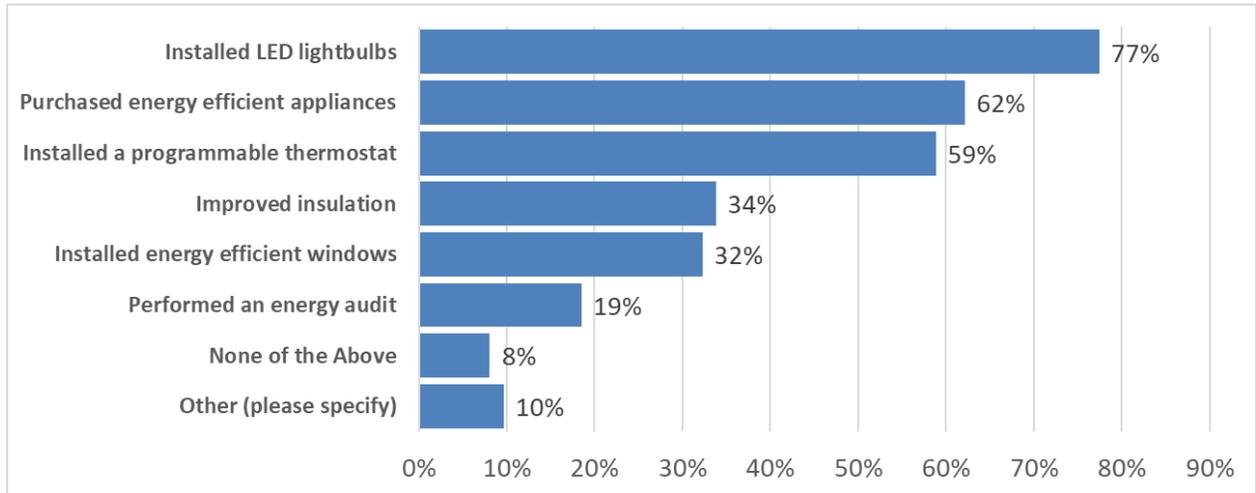


Question 8 asked about communications and program updates. The dedicated Community Power page on the Town’s website is the principal means of updating and providing Program details. It will be supplemented with printed and posted notices, flyers, informational meetings and presentations, social campaigns,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

How would you like to be updated on this program? Circle all that apply:



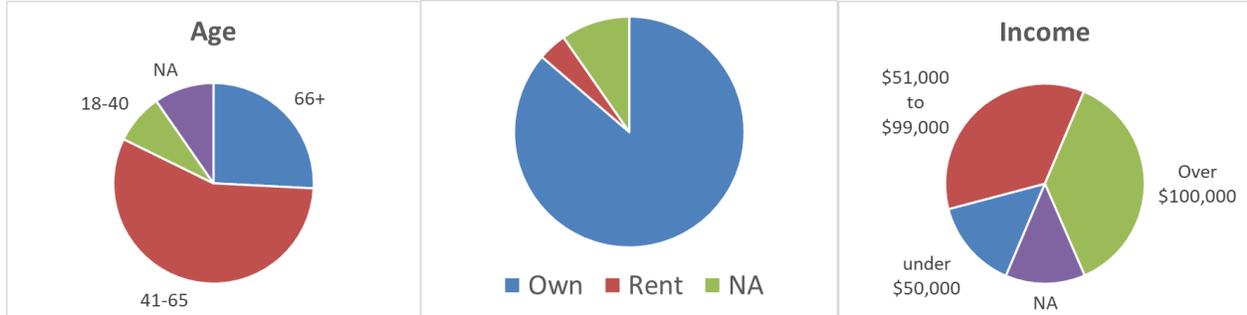
Questions 9 and 10 asked about awareness and use of Energy Efficiency to reduce energy use and costs compatible with Community Power. A small minority, 19%, of respondents have done an energy audit on their home or business through the utility sponsored NHSaves program or privately, but many have implemented efficiency measures, especially LED lighting (77%) and efficient appliances (62%).



Comments on Efficiency:

installed heat pumps
 Heat pump
 Solar panels
 geothermal heat/ac
 Built energy efficient home 1982, cordwood stove, heat pump
 2021
 Conservation measures
 Have an energy audit in February
 Home is only 16 years old.
 Pellet stove
 installed 96% efficient boiler and 89% efficient HRV
 Solar panels
 Heat Pump for all HVAC with propane for extremely cold
 incursions.
 air source heat pumps for heat & a/c

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.



Conclusion: Milford Community Power can provide attractive options for Milford 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.