



Comments of PowerOptions

PowerOptions appreciates the opportunity to provide comments to the Massachusetts Electric Distribution Companies (“EDCs”), the Massachusetts Department of Energy Resources (“DOER”), and the Attorney General’s Office (“AGO”) on key areas of the request for proposals (“RFP”) for clean energy generation. PowerOptions is a non-profit energy buying consortium providing competitively procured, pre-negotiated optimal pricing for electricity, natural gas, and solar energy to non-profits and public entities under best-in-industry contracts terms and conditions. PowerOptions has close to 500 members in Massachusetts and several members in Connecticut and Rhode Island. Our members include hospitals and healthcare systems, colleges and universities, community and human service agencies, K-12 public and private schools, museums, as well as municipalities and housing authorities, with approximately 200 MWs of peak load and about 1 billion kWhs of energy.

PowerOptions does not have comments on the specific issues presented for stakeholder comment but wish to raise one overarching concern that has relevance to and impacts the evaluation criteria for the solicitation. Specifically, PowerOptions urges DOER, the AGO and the EDCs to clearly indicate at the outset that bids from projects where an affiliate of the EDCs has a financial interest will not be considered. If those projects with a financial relationship are allowed to bid into the RFPs, the transparency and fairness of the entire process is undermined. There will be no way of knowing for sure that the winning bidder was chosen based solely on merit. Therefore, it is crucial that any conflict of interest, real or perceived, be avoided as these large procurements will undoubtedly have a significant impact on future electricity rates.