

# Ludlow Power Choice

## Education and Outreach Plan

August 3, 2023 - Draft

This document presents a draft public Education and Outreach Plan for Ludlow Power Choice (Program). This Education and Outreach Plan was developed in consultation with the Ludlow Town Administrator, and these outreach efforts have been customized to ensure that the population of Ludlow has as much access as is possible to Program information and resources.

Ludlow (Town) will be able to finalize the strategy once the Program launch date and pricing have been established, which cannot happen until after the Department of Public Utilities (DPU) approves the Town's aggregation plan and the Town selects an electricity supplier (Competitive Supplier) for the Program.

### I. Education and outreach schedule

#### A. Aggregation plan development period

While developing its aggregation plan, the Town endeavored to begin engaging the community with the Program by announcing a public comment period of 30 days and soliciting comments (see Petition, Attachment G for copies of comments received). A public presentation of the plan was made during that 30-day period on [DATE] (see Petition for Approval of Municipal Aggregation Plan (Petition), Attachment F for a copy of the presentation). The formal announcement, public comment period, and public presentation of the plan were publicized as follows:

- Sent out to the local newspaper, *The Register*, and the regional newspaper, *The Reminder*
- Posted on the home page of Ludlow's municipal website
- Posted on the home page of the Ludlow Power Choice aggregation website, LudlowPowerChoice.com
- Posted on a bulletin board in Town Hall
- Sent out via social media posts on the official Town Facebook account
- Sent to municipal agencies, including Ludlow Veteran's Services, the Ludlow Council on Aging, the Ludlow Conservation Commission, the Ludlow Planning Board, and the Ludlow Housing Authority.
- with a request that they share the information with their constituents/members,

The Town also developed initial Program branding and an initial handout, launched an informational website, which is available at LudlowPowerChoice.com and made customer support available to the public through the website so the public could get early answers to questions about the Program.

See Petition, Attachment E for a copy of communications sent out about the public presentation of the plan and public comment period.

## B. Regulatory review period

To ensure access to Program information during this period and on an ongoing basis during Program operation, the Town will provide a link to LudlowPowerChoice.com and basic information about the Plan in a prominent location on the Town's website. Once complete and approved by the DPU, the final version of all Program documents and educational materials will be made available and updated on LudlowPowerChoice.com.

## C. Electricity supply contract is signed

After the regulatory review process is complete, the electricity supply contract is signed. Signing the electricity supply contract does not itself include any outreach to the general community, but it is a milestone that moves the Town toward the formal education and outreach efforts that immediately precede Program launch.

The contract is signed as a result of a competitive procurement process, and includes the Program pricing, the Program structure, the amount of any additional renewable electricity that will be made available to participants, the Competitive Supplier, and the electricity supply contract duration.

## D. Formal public education and outreach period

During the period of time between electricity supply contract signing and Program enrollment, the Town will conduct a formal public education and outreach effort. That effort will include the following:

### 1. Contract announcement + website update + outreach to community organizations

The Town will publicize a **press release/announcement** about the Program launch and Program details as follows:

- Sent out to the local newspaper, *The Register*, and the regional newspaper, *The Reminder*
- Posted on the home page of Ludlow's municipal website
- Posted on the home page of the Ludlow Power Choice aggregation website, LudlowPowerChoice.com
- Posted on a bulletin board in Town Hall
- Sent out via social media posts on the official Town Facebook account
- Sent to municipal agencies, including Ludlow Veteran's Services, the Ludlow Council on Aging, the Ludlow Conservation Commission, the Ludlow Planning Board, and the Ludlow Housing Authority.
- Via announcement at a Select Board meeting
- Via a brief cable access video

The **Program website** will be updated to include the following information:

- Competitive Supplier name
- Customer support information
- Program pricing and Program option descriptions
- Information about the renewable energy content in the Program offerings

- A form that allows customers to select a Program option
- Opt-out information and a form for opting out online
- Information about how to opt into the Program for those customers who will not be automatically enrolled, including an online enrollment form
- Information on submitting tax-exemption documentation
- Additional resources, such as the approved aggregation plan and the electricity supply contract

**2. “Coming soon postcard mailing by the Competitive Supplier**

- To ensure the public is looking for and recognizes the Opt-Out Notice as an important and legitimate communication from the Town, a “coming-soon” postcard will be mailed to eligible customers in Ludlow. The contracted Competitive Supplier will cover the cost of the postcard and will execute the mailing.

**3. Opt-Out Notice mailing by the Competitive Supplier + public education events**

- The Opt-Out Notice and Opt-Out Reply Card will be mailed to eligible customers in Ludlow, accompanied by the D.P.U.-required Language Access Document.<sup>1</sup>
- The Town will host **at least two community-wide public education sessions** that are available to the general public: at least one public education session at the Ludlow Council on Aging / Senior Center targeted for seniors and at least one additional session. The public information sessions will be publicized in the Program announcement, which will be distributed as described in D. 1., including on the municipal website, on the Program website, and through the Town’s Facebook account. In addition the Town will publicize the schedule of the information sessions to the municipal agencies listed in D.1. and ask them to share with their members via email, social media, and other means.

**4. Anticipated materials for the public education effort**

- a. Informational presentation:** An informational presentation will be created to provide a Program overview at public education events
- b. An informational handout:** An informational handout will be created and distributed in public buildings, to community groups, and at public information sessions about the Program. The handout will provide updated Program details such as pricing, Program options, how to opt out, and participation information.
- c. Social media posts**

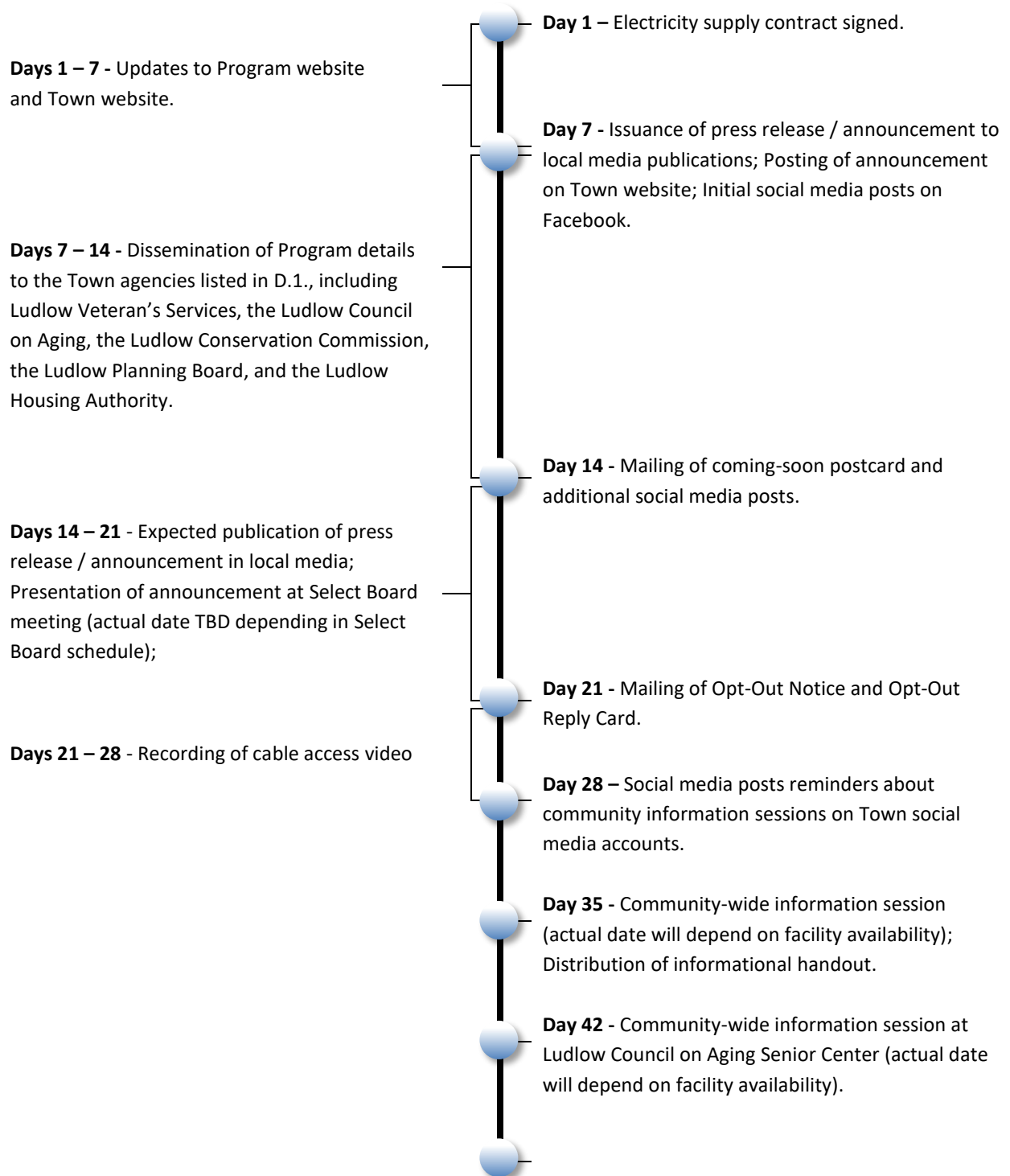
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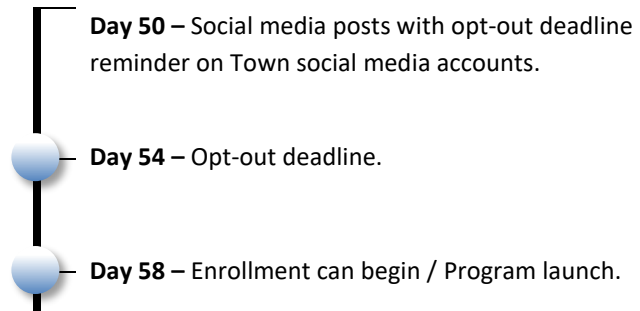
<sup>1</sup> The required Language Access Document translates the following text into 26 languages that, according to U.S. Census Bureau data, are the languages spoken by Massachusetts residents with limited English proficiency:

Important notice enclosed from Ludlow about your electricity service. Translate the notice immediately. Call the number or visit the website, above, for help.

## 5. Illustrative Program outreach timeline

Ludlow will endeavor to launch the Program as soon as is possible after signing an electricity supply contract. The timeline below is illustrative. The actual timeline will be dependent on the actual length of time between when the supply contract is signed and the Program is scheduled to launch, as well as other factors such as the availability of public spaces for meetings.





Discounts provided by Eversource to low-income customers will not be impacted by their enrollment in the Program.

#### E. After Program launch

After Program launch, customer support provided by MassPowerChoice, the Town’s Program consultant, will remain available via phone, email, and the web for the duration of the Program.

The Town will notify customers of any change in product price or renewable energy content consistent with all notification requirements for the competitive supply market required by the Department of Public Utilities that are applicable to aggregation programs. The Town will notify customers of any change in Program price (including a change in Program price at the start of a new supply period) at least 30 days prior to any such change. At a minimum, the Town will provide that notification by issuing a media release, posting a notice on a bulletin board in Town Hall, posting a notice on the Town’s municipal website and municipal social media accounts, and posting a notice on the Program website, LudlowPowerChoice.com. In addition, the Town will send a price-change notification mailing to all active customers.

If, after Program launch, there is a change in law (i.e., “regulatory event or “new taxes per Article 18 of the ESA) that results in a direct, material increase in costs during the term of the ESA, the Town and the Competitive Supplier will negotiate a potential change in the Program price. At least 30 days prior to the implementation of any such change, the Town will notify consumers of the change in price by issuing a media release and posting a notice in Town Hall and on the Town website and will send a price-change notification mailing to all active customers. The Town will notify the DPU Consumer Division prior to the implementation of any change in Program price related to a change in law. Such communication will occur at least ten days prior to the consumer notification and include copies of all media releases, Town Hall and website postings, and other communications the Town intends to provide to customers regarding the change in price.

As part of its ongoing service, the Town will provide the disclosure information required by G.L. c. 164, § 1(F)(vi) and 220 C.M.R. § 11.06. The Town has requested a waiver from the requirement that the disclosure label be mailed to every customer and seeks permission instead to provide the information through alternative means. Specifically, on a quarterly basis, the Town will publicize either the disclosure label or a link to download a PDF of the complete disclosure label along with explanatory text such as the following:

The electricity supplier for Ludlow Power Choice, the Town’s electricity program, has sent an updated electricity disclosure label. Participants in Ludlow Power Choice can use this label to learn about the electricity supplied through the program, including the sources of that electricity.

The Town’s intention is to publicize the labels in March, June, September, and December. The Town will publicize them in the following ways:

- By posting a physical notice and disclosure label on a bulletin board at Town Hall
- As a news item on the home page of the Town website
- Sent out via social media posts on the official Town Facebook account.
- Via announcement on the Town’s cable access channel
- By posting a notice and disclosure label on the Program website

## II. Access for customers with limited English proficiency and who require other assistance

The American Community Survey offers information on languages and language groups within the Town of Ludlow.

The most recent data is from 2021<sup>2</sup> and provides information about a combination of specific languages and language groups. Based on 2021 report data, out of a total of 20,503 residents over the age of five:

- 15,595 speak only English and 4,908 or 2.4% speak other languages.
- Of those that speak other languages, 2117 or approximately 43% (10.3% of the total population) speak English “less than very well.”
- Among those who speak English “less than very well,” speakers of Spanish comprise a significant population, with 489 speakers.
- As the table below suggests, others that speak English “less than very well” are members of broader language groups. Please see Appendix A for a copy of the original data and the data source.

Language	Number of speakers	% of total Ludlow population
Spanish	489	2.39%
French, Haitian, or Cajun	29	0.14%
German or other West Germanic languages	0	0.00%
Russian, Polish, or other Slavic languages	65	0.32%
Other Indo-European languages	1,178	5.75%

<sup>2</sup> Table C16001: Language Spoken at home for the population 5 years and over

Korean	0	0.00%
Chinese (incl. Mandarin, Cantonese)	0	0.00%
Vietnamese	1	0.00%
Tagalog (incl. Filipino)	33	0.16%
Other Asian and Pacific Island languages	257	1.25%
Arabic	0	0.00%
Other and unspecified languages	65	0.32%

For detail on specific language instead of language groups, the older 2015 American Community Survey<sup>3</sup> provides greater detail. (The same detail is not available for the Town of Ludlow in 2021 American Community Survey data.) The table below offers that detail and assumes a total Ludlow population of 20,274, as reported in the 2015 data. With this level of detail, we see that, at that time, speakers of Portuguese were the dominant population that spoke English “less than very well.” Within the more recent data from 2021, speakers of Portuguese would be included under “Other Indo-European languages.” Please see Appendix A for a copy of the original data and the data source.

#### Population speaking English less than very well

Language	Number of speakers	% of total Ludlow population
Spanish or Spanish Creole	160	0.79%
French (incl. Patois, Cajun)	25	0.12%
French Creole	0	0.00%
Italian	14	0.07%
Portuguese or Portuguese Creole	1,277	6.30%
German	0	0.00%
Yiddish	0	0.00%
Other West Germanic languages	0	0.00%
Scandinavian languages	0	0.00%
Greek	0	0.00%
Russian	21	0.10%

<sup>3</sup> Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

Polish	153	0.75%
Serbo-Croatian	0	0.00%
Other Slavic languages	0	0.00%
Armenian	0	0.00%
Persian	0	0.00%
Gujarati	0	0.00%
Hindi	0	0.00%
Urdu	0	0.00%
Other Indic languages	0	0.00%
Other Indo-European languages	0	0.00%
Chinese	27	0.13%
Japanese	0	0.00%
Korean	0	0.00%
Mon-Khmer, Cambodian	0	0.00%
Hmong	0	0.00%
Thai	0	0.00%
Laotian	0	0.00%
Vietnamese	0	0.00%
Other Asian languages	185	0.91%
Tagalog	10	0.05%
Other Pacific Island languages	0	0.00%
Navajo	0	0.00%
Other Native North American languages	0	0.00%
Hungarian	0	0.00%
Arabic	0	0.00%
Hebrew	0	0.00%
African languages	5	0.02%
Other and unspecified languages	0	0.00%



To ensure adequate access to the aggregation Opt-Out Notice and other information about the Program for electricity customers with limited English proficiency, Ludlow will:

- Provide on-demand machine translation of the Program website before, during, and after Program launch, including price change announcements, which are featured on the website home page.
- Include the DPU-required Language Access document as a cover sheet with the Opt-Out Notice mailing. The Language Access document will include the following text translated into 26 languages:

*Important notice enclosed from Ludlow about your electricity service. Translate the notice immediately. Call the number or visit the website, above, for help.*

In addition, the Language Access document will include the MassRelay TTY phone number for both Spanish and English speakers.

- Provide on-demand phone interpreting in 200 languages via the Program's toll-free customer service telephone number before, during, and after Program launch.
- Any further need for interpreting or translation will be addressed on an ad hoc basis as the need becomes known to the Town, both before and after Program launch.

### III. Access for customers with a physical disability or who require visual or audio assistance

Outreach will be conducted in both print and audio formats and will include handouts and electronic and web-based materials as well as live presentations.

To the extent possible, all public education events will be held in accessible spaces such as Town buildings. In the event public education events cannot be presented as in-person events, they will be held online and as such will be accessible to those with limited mobility.

Before Program launch and on an ongoing basis after Program launch, customers who are blind or otherwise visually impaired may request assistance reading Program materials and the Program website, which will include price change information, by calling the customer support number. The Program website will be designed so that content can be read aloud by computer-assistive technology. For customers who are deaf or hard of hearing, the Language Access Document, which will accompany the Opt-Out Notice, will include TTY phone numbers for use by both English- and Spanish-speaking customers. In addition, customer support will be available via multiple modalities: voice (phone) as well as written (web form and email) both before and after Program launch.

### IV. Competitive supply customers

Where the Town's education and outreach materials address the availability of the Program to competitive supply customers, those materials will disclose that such customers may be subject to

penalties or early termination fees from their Competitive Supplier if they switch from competitive supply to the Town’s Program during the term of a competitive supply contract.

Appendix A – Source data for population speaking English less than very well

Table C16001, Language Spoken at home for the population 5 years and over

Original source data for Table C16001, entitled *Language Spoken at home for the population 5 years and over*, from the 2021 American Community Survey.<sup>4</sup>

<b>Ludlow town, Middlesex County, Massachusetts</b>		
<b>Label</b>	<b>Estimate</b>	<b>Margin of Error</b>
Total:	20,503	±145
Speak only English	15,595	±711
Spanish:	1,314	±486
Speak English "very well"	825	±350
Speak English less than "very well"	489	±356
French, Haitian, or Cajun:	141	±109
Speak English "very well"	112	±105
Speak English less than "very well"	29	±33
German or other West Germanic languages:	11	±19
Speak English "very well"	11	±19
Speak English less than "very well"	0	±25
Russian, Polish, or other Slavic languages:	337	±184
Speak English "very well"	272	±167
Speak English less than "very well"	65	±44
Other Indo-European languages:	2,565	±503
Speak English "very well"	1,387	±346
Speak English less than "very well"	1,178	±315

<sup>4</sup> The table can be accessed directly at the following link:  
<https://data.census.gov/table?q=ludlow+massachusetts+c16001&tid=ACSDT5Y2021.C16001>

Korean:	0	±25
Speak English "very well"	0	±25
Speak English less than "very well"	0	±25
Chinese (incl. Mandarin, Cantonese):	22	±36
Speak English "very well"	22	±36
Speak English less than "very well"	0	±25
Vietnamese:	1	±3
Speak English "very well"	0	±25
Speak English less than "very well"	1	±3
Tagalog (incl. Filipino):	76	±77
Speak English "very well"	43	±60
Speak English less than "very well"	33	±49
Other Asian and Pacific Island languages:	350	±223
Speak English "very well"	93	±96
Speak English less than "very well"	257	±195
Arabic:	0	±25
Speak English "very well"	0	±25
Speak English less than "very well"	0	±25
Other and unspecified languages:	91	±128
Speak English "very well"	26	±37
Speak English less than "very well"	65	±92

Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

Original source data for Table B16001, entitled Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, from the 2015 American Community Survey.<sup>5</sup>

<b>Ludlow town, Middlesex County, Massachusetts</b>		
<b>Label</b>	<b>Estimate</b>	<b>Margin of Error</b>
Total:	20,274	±223
Speak only English	15,470	±721
Spanish or Spanish Creole:	948	±326
Speak English "very well"	788	±305
Speak English less than "very well"	160	±70
French (incl. Patois, Cajun):	108	±64
Speak English "very well"	83	±55
Speak English less than "very well"	25	±32
French Creole:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Italian:	33	±33
Speak English "very well"	19	±22
Speak English less than "very well"	14	±23
Portuguese or Portuguese Creole:	2,868	±573
Speak English "very well"	1,591	±415
Speak English less than "very well"	1,277	±304
German:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Yiddish:	0	±22
Speak English "very well"	0	±22

<sup>5</sup> The table can be accessed directly at the following link:  
<https://data.census.gov/table?q=b16001+ludlow+massachusetts&tid=ACSDT5Y2015.B16001>

Speak English less than "very well"	0	±22
Other West Germanic languages:	20	±32
Speak English "very well"	20	±32
Speak English less than "very well"	0	±22
Scandinavian languages:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Greek:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Russian:	33	±36
Speak English "very well"	12	±19
Speak English less than "very well"	21	±31
Polish:	426	±287
Speak English "very well"	273	±160
Speak English less than "very well"	153	±169
Serbo-Croatian:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Other Slavic languages:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Armenian:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Persian:	0	±22
Speak English "very well"	0	±22

Speak English less than "very well"	0	±22
Gujarati:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Hindi:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Urdu:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Other Indic languages:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Other Indo-European languages:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Chinese:	74	±103
Speak English "very well"	47	±62
Speak English less than "very well"	27	±45
Japanese:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Korean:	20	±33
Speak English "very well"	20	±33
Speak English less than "very well"	0	±22
Mon-Khmer, Cambodian:	0	±22
Speak English "very well"	0	±22

Speak English less than "very well"	0	±22
Hmong:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Thai:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Laotian:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Vietnamese:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Other Asian languages:	229	±221
Speak English "very well"	44	±68
Speak English less than "very well"	185	±190
Tagalog:	10	±16
Speak English "very well"	0	±22
Speak English less than "very well"	10	±16
Other Pacific Island languages:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Navajo:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Other Native North American languages:	0	±22
Speak English "very well"	0	±22

Speak English less than "very well"	0	±22
Hungarian:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Arabic:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
Hebrew:	0	±22
Speak English "very well"	0	±22
Speak English less than "very well"	0	±22
African languages:	5	±13
Speak English "very well"	0	±22
Speak English less than "very well"	5	±13
Other and unspecified languages:	30	±49
Speak English "very well"	30	±49
Speak English less than "very well"	0	±22