



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: D.P.U. 24-15, Energy Burden Phase II, Electronic Distribution List

FROM: Jennifer Keegan, Hearing Officer

DATE: April 14, 2026

RE: **Corrected** Request for Comments, Superseding Request for Comments dated March 31, 2026

CC: Peter Ray, Department Secretary

I. INTRODUCTION

On March 31, 2026, the Department of Public Utilities (“Department”) issued a Request for Comments to the Service List in Energy Burden, D.P.U. 24-15. This Corrected Request for Comments supersedes the March 31, 2026 Request for Comments. Obtaining comments that respond to the below Request will assist the Department in building a robust record as we work toward widespread deployment of tiered discount rates. This corrected memorandum seeks written comments to memorialize certain content discussed on April 7, 2026, to assist the Department in issuing an Order to provide the direction needed for the gas and electric distribution companies (“Distribution Companies”) to implement tiered discount rates by November 1, 2026. Due to numerous anticipated filings in the coming weeks in this docket, such as the distribution company compliance filings following the Phase I Order and the Phase II working group reports, the Department is amending the content for which it seeks comments and extending the associated deadlines. Therefore, the deadline for comments is extended to May 11, 2026 or July 17, 2026, as noted below.

II. DESCRIPTION OF PHASE II

On February 17, 2026, the Department issued a final Phase I Order establishing a tiered discount rate framework to address energy affordability for low-income residential ratepayers. On May 16, 2025, the Department issued a Hearing Officer Memorandum establishing a working group to inform Phase II issues. The Phase II issues include enrollment, verification, outreach, documentation, eligibility for a low-income discount rate (“LIDR”), and related issues. Phase II topics also include issues identified within Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, D.P.U. 23-150, that are related to the

implementation of the D.P.U. 24-15 Phase I Interlocutory order, such as third-party verification, National Grid's self-attestation pilot, and expanding data sharing agreements.

To address the Phase II issues, the Department convened a stakeholder working group ("Energy Burden Working Group"). The Energy Burden Working Group, co-chaired by representatives from the Attorney General's Office, the Distribution Companies, and the National Consumer Law Center ("NCLC"), discusses the Phase II questions with stakeholders to pursue consensus on the best practices for implementation of the tiered discount rates established in the Phase I Interlocutory Order. The Energy Burden Working Group's mission is to engage key stakeholders to identify and capture areas of opportunity, consensus, and/or diverse perspectives on several issues related to the goals of D.P.U. 24-15. To date, the Energy Burden Working Group has convened 16 meetings from June 2025 through April 2026. The Department appreciates the dedicated work of the Energy Burden Working Group co-chairs and participants.

The Department anticipates receiving two reports in the coming weeks from the Energy Burden Working Group addressing some of the items following D.P.U. 23-150. The Department convened a technical conference on April 7, 2026, to discuss questions raised by the Distribution Companies in response to the Department's Phase I Order and to address certain Phase II topics. As discussed at the technical conference, the Energy Burden Working Group reports will be filed shortly.

III. CORRECTED REQUEST FOR COMMENTS

The Department seeks further input from stakeholders, including members of the public, advocates, and Distribution Companies on these Phase II issues. The Department invites all interested persons to submit written comments on this matter -- including comments on the questions below, not later than the close of business (5:00 p.m.) on **May 11, 2026 or July 17, 2026, as specified below**. Please note that the Department's Requests for Comments are organized by subject matter with varying due dates. The Department encourages interested persons to present consensus positions and submit comments jointly, when possible.

All comments should be submitted to the Department in **.pdf format** by email attachment to dpu.efiling@mass.gov and jennifer.l.keegan@mass.gov. The text of the email must specify: (1) the docket number of the proceeding (D.P.U. 24-15); (2) the name of the person or entity submitting the filing; and (3) indicate that the document is a written comment. The electronic filing should also include the name, title, and telephone number of a person to contact in the event of questions about the filing.

All documents submitted in electronic format will be posted on the Department's website through our online File Room as soon as practicable at: <https://eeaonline.eea.state.ma.us/DPU/Fileroom/dockets/bynumber>. Enter "24-15" in the Docket Number field to view documents related to this proceeding. Please note that any comments will be posted to our website as received and without redacting personal information, such as addresses, telephone numbers, or email addresses. As such, consider the extent of information you wish to share when submitting comments. The Department strongly encourages public

comments to be submitted by email. If, however, a member of the public is unable to send written comments by email, a paper copy may be sent to Peter Ray, Secretary, Department of Public Utilities, One South Station, Boston, Massachusetts, 02110.

The Order and all subsequent related documents submitted to the Department or issued by the Department will be available on the Department's website as referenced above as soon as is practicable. To the extent a person or entity wishes to submit comments in accordance with this Notice, electronic submission, as detailed above, is sufficient. To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), contact the Department's ADA coordinator at eeadiversity@mass.gov.

For further information regarding this Notice, please contact Jennifer L. Keegan, Hearing Officer, Department of Public Utilities, at jennifer.l.keegan@mass.gov.

IV. QUESTIONS FOR COMMENTA. SELF ATTESTATION, Comments due July 17, 2026.

- a. Provide information on the cost of fraud in self-attestation programs used to verify eligibility for utility discounts. Compare the cost of fraud in self-attestation programs for utility discounts to the cost of third-party verification programs used to verify eligibility for utility discounts.

B. SIMPLIFYING SIGN UP AND INCOME VERIFICATION FOR CUSTOMERS, Comments due May 11, 2026.

- a. Please describe recommended methods to report and verify household size as part of the income verification process.
- b. In cases where income verification provided to the Distribution Companies does not include the customer's income eligibility tier, please discuss:
 - i. Whether such customers should be placed on the lowest discount tier (i.e., lowest discount percentage) by default for rate implementation by November 1st. Specify any technical barriers to using this method.
 - ii. Whether the Distribution Companies should use an alternative placement method for such customers for rate implementation by November 1st. Specify any technical barriers to using an alternative method.
 - iii. The anticipated frequency of such cases described above.
- c. Please describe whether customers enrolled in the discount rate through self-attestation should be placed on the lowest discount tier (i.e., lowest discount percentage) by default. Specify any technical barriers to using an alternative tier placement method.
- d. In cases where, after the low-income discount tiers are implemented, a customer already enrolled in a discount tier experiences a change in income and is reclassified to a different discount tier, please discuss:

- i. Any recommendations for the transition timeline (e.g., immediate or phased) to a higher discount percentage if the customer's income has decreased, as well as the technical feasibility of implementing such a transition timeline by November 1st.
- ii. Any recommendations for the transition timeline (e.g., immediate or phased) to a lower discount percentage if the customer's income has increased, as well as the technical feasibility of implementing such a transition timeline by November 1st.

C. ONE-STOP SHOP, Comments due **May 11, 2026.**

- a. Please describe any recommendations for an energy-focused "one stop shop" where customers could sign up for the discounted rate (e.g., work with a community action agency ("CAA") office). Include details such as:
 - i. whether an energy-focused one-stop shop should be publicly or privately funded,
 - ii. how and where an energy-focused one-stop shop should be delivered (e.g., online, via hotline, and/or in person at a CAA office),
 - iii. types of services or programs that should be included in an energy-focused one-stop shop, and
 - iv. best practices for establishing energy-focused one-stop shops based on examples in the United States or in other countries.
- b. Please describe recommended methods to align income requirements and verification procedures across programs such as rental assistance and food benefits to allow income eligible ratepayers to use one verification process.

D. MAKING AFFORDABILITY PROGRAMS MORE UNDERSTANDABLE OUTREACH AND EDUCATION, Comments due May 11, 2026.

- a. Refer to D.P.U. Common 7-1. What specific Marketing, Education and Outreach ("MEO") efforts are needed to assist underserved customers, including underserved customers in environmental justice populations?
- b. Are specific MEO efforts needed to assist renters? If yes, please describe these efforts.

E. FUNDING FOR COMMUNITY ACTION AGENCIES, Comments due **May 11, 2026.**

- a. How are CAAs funded? Is funding restricted to federal and state grants or do other sources also fund CAAs? Are CAAs compensated for their work to sign customers up for energy efficiency programs, LIHEAP and the low-income discount? Do distribution companies provide funding to CAAs? Describe any funding from distribution companies to CAAs in detail – what do the distribution companies fund and how is the funding provided?
- b. Do you support funding to assist the CAAs in their work to sign customers up for the low-income discount and other energy affordability programs? How would this funding be delivered to CAAs?
- c. Do you support expanding or eliminating the time period for signing up for low-income discounts by the CAAs?
- d. What amount of funding or expense by distribution companies and their ratepayers would be necessary to support CAAs with the expense of LIDR income verification? How would the requisite funding change if the sign-up period were expanded or eliminated? Should CAAs be compensated for outreach and education expenses in service of reaching LIDR customers?

F. REPORTING METRICS (FOR DISTRIBUTION COMPANIES), Comments due **May 11, 2026.**

- a. Describe the difficulty in adding/integrating the below metrics into the tiered discount rate information technology (“IT”) projects for purposes of program reporting:
 - i. number of households enrolled in each discount rate tier;
 - ii. length of time a household remains on any discount rate tier;
 - iii. length of time a household remains on each discount rate tier;
 - iv. Number of customers who report income qualification information via:
 - (A) CAAs;
 - (B) state data matching (i.e., Executive Office of Health and Human Services); and
 - (C) directly to the distribution company;
 - v. number of limited English proficient or non-English speaking households enrolled on discount rates; and

- vi. number of households in environmental justice (“EJ”) populations enrolled on discount rates.
- b. Estimate the IT costs of adding/integrating each of the metrics in (a).

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