



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: March 31, 2026

RE: Request for Comments

CC: Peter Ray, Department Secretary

I. INTRODUCTION

The Department of Public Utilities (“Department”) opened this inquiry to examine energy burden with a focus on energy affordability for residential ratepayers. Energy Burden Inquiry, D.P.U. 24-15, Vote and Order Opening Inquiry (2024) (“Vote and Order”). In particular, the Department sought to consider improvements to existing energy affordability policies and programs, to ensure maximum participation in each of these programs, and to determine whether additional programs may further benefit residential ratepayers of the Commonwealth’s electric distribution companies (“EDCs”) and gas local distribution companies (“LDCs”) (together, “Distribution Companies”).

II. DESCRIPTION OF PHASE II

On February 17, 2026, the Department issued a Phase I Interlocutory Order establishing a low-income 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. To address the Phase II issues – which include enrollment, verification, outreach, documentation, eligibility for a low-income discount rate (“LIDR”), and related issues – the Department convened a stakeholder working group. The 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 reach consensus on the best practices for implementation of the tiered discount rates established in the Phase I Interlocutory Order.

The 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.

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 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.

III. 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 **April 21, 2026**. 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

- 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. EVALUATING LOW-INCOME DISCOUNT RATE PROGRAM SUCCESS

- a. How should the Department assess success of the LIDR? Specifically, what are appropriate metrics of success, what data is necessary, how often should metrics be analyzed, and who should analyze them?
- b. Please discuss methods to evaluate the low-income discount rate program over time.

C. SIMPLIFYING SIGN UP AND INCOME VERIFICATION FOR CUSTOMERS

- a. 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.
- b. Please describe recommended methods to report and verify household size as part of the income verification process.

D. ONE-STOP SHOP

- a. Please describe any recommendations for an energy-focused “one stop shop” where customers could sign up for the discounted rate. 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 CAP 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.

E. MAKING AFFORDABILITY PROGRAMS MORE UNDERSTANDABLE

- a. Provide examples of where terms used for income requirements and verification procedures can be simplified.
- b. Provide examples of how documentation requirements can be reduced or simplified for income-eligible households.

F. OUTREACH, AND EDUCATION

- a. How should existing marketing, education, and outreach (MEO) efforts be tailored or expanded to reach customers who may qualify for LIDR?
 - i. Should Companies use existing energy efficiency MEO channels and processes to promote enrollment for customers who qualify for LIDR?
 - ii. Are there other existing channels that can be utilized to promote enrollment for qualifying customers?
- b. Are new MEO efforts specific to LIDR needed? If so, please describe the scope of such programs, who should conduct them, and the costs of such programs.
- c. Refer to D.P.U. Common 7-1. Are specific MEO efforts needed to assist underserved customers, including underserved customers in environmental justice communities? If yes, how should MEO be adapted for underserved customers and environmental justice communities (e.g., through culturally sensitive and translated messages)?
- d. Are specific MEO efforts needed to assist renters? If yes, please describe these efforts.
- e. Are specific MEO efforts needed to assist customers with limited English proficiency? If yes, please describe these efforts.
- f. Are specific MEO efforts needed to assist customers without US citizenship documentation? If yes, please describe these efforts.
- g. Should Companies provide information on available energy affordability offerings, such as a discount rate, LIHEAP, or energy efficiency programs with disconnection notices? (This may require an amendment to the Department's billing and termination regulations at 220 C.M.R. 25.00 et. seq.)

G. FUNDING FOR COMMUNITY ACTION AGENCIES

- a. How are community action agencies (“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 appropriate 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?

H. ELIGIBILITY AND VERIFICATION

Refer to Energy Burden, Phase I Order, D.P.U. 24-15-B at 24-28 and Energy Burden, Order on Motions for Clarification, D.P.U. 24-15-C at 7.

- a. If the household income verification information provided to the Distribution Companies does not include the income eligibility tier, what should the default tier be?
- b. When a household income verification is performed for a customer who is already on a discount rate, and the customer’s income has changed such that they are now only eligible for a lower discount tier, should the customer be transitioned immediately to that lower tier discount?
- c. If the Commonwealth of Massachusetts’s indication of household income data matching and community action agency provided HEAP tiers do not match, should Distribution Companies utilize the most recent household income verification indication?

- d. Is Discount Rate Tier reporting by the Distribution Companies needed? If so, please identify the reporting needed.

I. FOR DISTRIBUTION COMPANIES

- a. Please provide current policies concerning shut offs during periods of extreme heat.
- b. Please provide current policies for customers who self-declare their eligibility for a low-income discount rate. (In other words, the customer seeks to qualify based on income verification alone and not qualification for a government program.) Do these customers receive a temporary discount rate and, if yes, for how long?
- c. Please describe the tools used by the Company to improve accessibility to its customers.(i.e. attendance at community events, presence on social media, customer service by phone, language access or other means).

J. FOR DISTRIBUTION COMPANIES: THIRD PARTY VERIFICATION

- a. Describe the Company's ability to extend the term of its recertification process for LIDR customers
- b. How do you engage, or do you have plans to engage, with community-based organizations ("CBOs) to better communicate with income-eligible customers?
- c. Please discuss your experience using a third party income verifier to confirm applicants' eligibility.
- d. Please discuss what information the third party verifier relied upon and where the third party verifier obtained its information.
- e. Please provide a range or estimate of the implementation costs of third-party verification.
- f. Please provide a range or estimate of on-going costs of third-party verification.
- g. Please provide a list of vendors providing third party verification services.
- h. Please provide methods to ensure that third party verifiers provide only the personal and household data that a Company needs to place customers within the correct discount level. Please include any recommended data privacy best practices regarding personal information including social security numbers.

<p>This document contains important information. Please have it translated immediately.</p> <p>В данном документе содержится важная информация. Вам необходимо срочно сделать перевод документа.</p> <p>Este documento contiene información importante. Por favor, consiga una traducción inmediatamente.</p> <p>تحتوي هذه الوثيقة على معلومات هامة. يرجى ترجمتها فوراً.</p> <p>Docikman sa gen enfòmasyon enpòtan. Tanpri fè yon moun tradwi l touswit.</p>	<p>Questo documento contiene informazioni importanti. La preghiamo di tradurlo immediatamente.</p> <p>Este documento contém informações importantes. Por favor, traduzi-lo imediatamente.</p> <p>此文件含有重要信息。請立即找人翻譯。</p> <p>본 문서에는 중요한 정보가 포함되어 있습니다. 본 문서를 즉시 번역하도록 하십시오.</p> <p>Tài liệu này có chứa thông tin quan trọng. Vui lòng dịch tài liệu này ngay.</p>	<p>ខេត្តសាវន្តប្រទេសកម្ពុជា ប្រើប្រាស់ឯកសារនេះដើម្បីបំពេញតួនាទីរបស់ខ្លួន។</p> <p>ខេត្តសាវន្តប្រទេសកម្ពុជា ប្រើប្រាស់ឯកសារនេះដើម្បីបំពេញតួនាទីរបស់ខ្លួន។</p> <p>ឯកសារនេះមានន័យសំខាន់ណាស់ ។</p> <p>សូមបកប្រែជាបន្ទាន់ ។</p> <p>Ce document contient des informations importantes. Veuillez le faire traduire au plus tôt.</p>
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