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July 10, 2020

Mark D. Marini, Secretary  
Department of Public Utilities  
One South Station, 5<sup>th</sup> Floor  
Boston, MA 02110

Re: Inquiry into Establishing Policies and Practices for Electric and Gas Companies – D.P.U. 20-58

Dear Secretary Marini:

The distribution company members of the Customer Assistance Working Group<sup>1</sup> submit this correspondence in response to the June 26, 2020 Order from the Department of Public Utilities (“Department”) in D.P.U. 20-58-A addressing the Working Group’s Customer Assistance Report (“Report”) filed on May 29, 2020. The Distribution Companies appreciate the Department’s approval of the Customer Outreach Plan offered in the report, including:

- (1) the Working Group’s objective to encourage customers to enroll in a payment plan prior to the expiration of the Shut-Off Moratorium.
- (2) the Plan’s proposed phased approach to resumption of missed payment obligations, service disconnections, replevin, and collections to ensure that customers are aware of their options and rights related to arrearages and permit Distribution Companies to facilitate a return to regular operations.
- (3) informing customers of outstanding balances, payment plans, AMPs, existing customer protections, and community resources provides customers with needed information in advance of the Distribution Companies’ resumption of normal operations.
- (4) other actions outlined in the First Report that are necessary to accomplish the above-stated directives.

The Department noted that it will address Working Group recommendations regarding Extended Payment Plans, the end of the Moratorium and other items in a separate Order.

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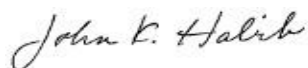
<sup>1</sup> Fitchburg Gas and Electric Light Company d/b/a Unitil, Massachusetts Electric Company and Nantucket Electric Company, Boston Gas Company and Colonial Gas Company, each d/b/a National Grid, and NSTAR Gas Company and NSTAR Electric Company, each d/b/a Eversource Energy, Bay State Gas Company d/b/a Columbia Gas of Massachusetts, Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty, The Berkshire Gas Company, and Blackstone Gas Company (“collectively, the “Distribution Companies”); the Office of the Attorney General (“AGO” or “Attorney General”, the Department of Energy Resources (“DOER”), the National Consumer Law Center (“NCLC”), the Low-Income Energy Affordability Network (“LEAN”) and the Associated Industries of Massachusetts (“AIM”) (together, the “Working Group”)

As required by the Department in the D.P.U. 20-58-A Order at 8, the Distribution Companies hereby notify the Department of their intention to move from Phase 0 to Phase 1 communications within 10 business days. The proposed Phase 1 communications include, "Assistance & Reminders." The Distribution Companies will continue Phase 0 activities and at the start of Phase I will gradually begin to send out missed payment notifications and proactively encourage customers to participate in a payment plan. In the later stages of Phase 1, closer to the end of the Shut-Off Moratorium, the Companies will continue to encourage participation in payment plans and will start to advise customers of the potential impacts of failing to do so once moratorium ends. The Distribution Companies will continue to suspend service disconnections, disconnection notices, late charges, replevin, and third-party collection activity.

The overall effectiveness of these communications, however, would greatly benefit from Department guidance on the remaining recommendations in the Report addressing the payment plan terms, the anticipated end of the Shut-Off Moratorium and plans to continue to waive late payment fees. For example, the timing of communications encouraging enrollment in payment plans prior to the expiration of the Shut-Off Moratorium would best be determined based on the Department's decision regarding the dates when the Shut-Off Moratorium will end for residential customers. In addition, communications regarding the availability of payment plans will likely be more effective if the Distribution Companies can specify at the outset of these communications the duration and terms of the payment plan being offered, based on the Department's decision on the Working Group's payment plan recommendations in the Report.

The Distribution Companies are eager to roll out the next phases in their Customer Outreach Plan, in coordination with the full Customer Assistance Working Group, and in a manner fully consistent with guidance from the Department. Thank you for your attention to this matter. Please contact me or any of the Working Group's counsel with any questions you may have regarding this filing.

Sincerely,



John K. Habib, Esq.

Enclosures

cc: Rachel Cottle, Esq. – Hearing Officer  
Elizabeth Anderson, Esq. – Office of the Attorney General  
Robert Hoagland, Esq. – Department of Energy Resources  
Charles Harak, Esq. - National Consumer Law Center  
Jerrold Oppenheim, Esq. – LEAN  
Robert Rio – Associated Industries of Massachusetts