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July 31, 2020

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th 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 Group¹ are in receipt of the Chairman’s Fourth Set of Orders under G.L. 25, Sec. 4B, issued on July 29, 2020 (“Fourth Order”). The Fourth Order, in part, directed the Distribution Companies as follows:

Until September 1, 2020, or you receive further communication under section 4B of chapter 25 of the General Laws, whichever comes first, the Companies shall not shut off gas, electric, or water service to any of their commercial and industrial customers for failure to pay a bill or any portion of a bill the Companies issued to a customer.

The Distribution Companies appreciate the issuance of this directive in the Fourth Order, which is consistent with the recommendations of the D.P.U. 20-58 Customer Assistance Working Group, submitted to the Department of Public Utilities (the “Department”) on May 29, 2020 (the “May 29 Report”). Phase 1 communications commenced on/about July 24, 2020, pursuant to the July 10, 2020 communication from the Distribution Companies in D.P.U. 20-58. Phase 1 has been the “soft” collections phase in which the Distribution Companies continued all Phase 0 communications activities and gradually began sending out missed payment notifications. The Distribution Companies have proactively encouraged customers to participate in a payment plan, but also advised them of the potential consequences of failing to do so once the current Shut-Off Moratorium ends. During Phase 1, the Distribution Companies continued to suspend disconnections, replevin, and third-party collection activity.

¹ 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 (“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”)

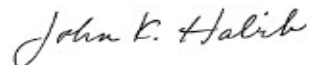
Notice to Department Regarding Phase 2 Communications
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In Phase 2 – “Resume Collections,” collection activities will restart for commercial and industrial customers. While the activities of Phase 0 and Phase 1 will continue, the Distribution Companies will begin field collections and dunning calls. Additionally, exception-based reprieves will be offered.² Lastly, Phase 2 will allow for rule-based disconnection notices, disconnections and replevins.

The Distribution Companies are aware of the Department’s directive in D.P.U. 20-58-A directing the companies to provide a 10-business day notice before moving from phase-to-phase within the communications plan. Given the date of the Fourth Order, and the need for the Distribution Companies to commence issuing disconnection notices on/about August 4, 2020 (as noted in their July 23, 2020 communication to the Department in this docket), the Distribution Companies respectively request a waiver from that directive.

Thank you for your attention to this matter. Please contact me 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

² The Distribution Companies wish to correct language included in their July 10, 2020 communication. Pursuant to the Report, the Distribution Companies, and the Customer Assistance Working Group, supports the Department’s proposal to continue waiving late payment fees for small C&I customers for six months following the date Governor Baker lifts the State of Emergency. Moreover, Distribution Companies, and the Working Group, support waiving late payments fees for any customer on a deferred payment plan.