

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF PUBLIC UTILITIES**

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Inquiry of the Department of Public Utilities into	)	
Establishing Policies and Practices for Electric and Gas	)	
Companies Regarding Customer Assistance and	)	D.P.U. 20-58
Ratemaking Measures in Connection to the	)	
State of Emergency Regarding the Novel	)	
Coronavirus (COVID-19).	)	
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**UPDATED REPORT OF THE CUSTOMER ASSISTANCE WORKING GROUP**

**I. INTRODUCTION**

On May 11, 2020, the Department of Public Utilities (“Department”) issued a Notice of Inquiry (“NOI”) to establish policies and practices regarding customer assistance and ratemaking measures for electric and gas companies in response to the effects of the novel coronavirus (“COVID-19”) pandemic. The NOI established a Customer Assistance and Ratemaking Working Group<sup>1</sup> (“Working Group”) to assist the Department in establishing appropriate policies and practices. The Department docketed this matter D.P.U. 20-58.

The Department directed the Working Group to first address the Department’s priority to establish customer assistance policies and practices and file a report with consensus recommendations by May 29, 2020 (NOI at 5). The Department also sought a consensus

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<sup>1</sup> The Department included the following organizations in the Working Group: Fitchburg Gas and Electric Light Company d/b/a Unital (“Unital”), Massachusetts Electric Company and Nantucket Electric Company, Boston Gas Company and Colonial Gas Company, each d/b/a National Grid (“National Grid”), and NSTAR Gas Company and NSTAR Electric Company, each d/b/a Eversource Energy (“Eversource”), Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“CMA”), Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty (“Liberty”), The Berkshire Gas Company (“Berkshire Gas”)(collectively, “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”).

ratemaking proposal that would both support the Working Group’s customer assistance initiatives and maintain the financial integrity of the utilities in light of the COVID-19 pandemic (*id.* at 10).

On May 29, 2020, the Working Group filed a consensus customer assistance report (“Report”) with several recommendations and open items to continue discussing as a working group. On June 26, 2020, the Department issued D.P.U. 20-58-A (“Order”) approving the Working Group’s customer outreach component of the Report. Further, the Order directed the Working Group to continue discussing open items and to provide the Department with “periodic reports that identify such information as additional details, specific timelines, revisions, and any new approaches, including plans to progress to a new phase of the four-phase general plan at least ten business days prior to each progression” (Order at 8).

The distribution company members of the Working Group<sup>2</sup> hereby submit the following compliance Report detailing consensus language and additional details of the customer outreach plan.

## **II. CUSTOMER OUTREACH**

### **A. Actions Taken To-Date**

As outlined in the Working Group’s Report, the Working Group proposed a high level four-phase plan for customer outreach (Report at 17-19). Progression through the phases is contingent on regulatory feasibility, severity of the pandemic, customer sentiment, organization preparedness and customer financial needs (Report at 18).

While in Phase 0, the Distribution Companies focused on customer awareness and education. Each Distribution Company’s customer outreach actions are outlined below.

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<sup>2</sup> DOER, NCLC, AGO and AIM do not oppose this Update to the Report or Appendix A. LEAN provided no comment.

**Berkshire Gas:**

Berkshire Gas provided customer communications via email, outbound mail, Interactive Voice Response (IVR) system, and the company website to inform all customers of the measures the Company had put in place to keep customers and employees safe, advise of the temporary suspension of service disconnections, and to offer financial assistance programs to manage bills. The average number of customers (all customer classes combined) on payment plans has decreased by 58% compared to prior to the COVID-19 Pandemic.

**CMA:**

Throughout Phase Zero Columbia Gas regularly provided updates to customers explaining the steps that the Columbia Gas has taken to keep our customers and employees safe. These updates were delivered through emails, bill inserts and newsletters beginning in March and continuing throughout the following months. Columbia Gas continues to update its website as with relevant information about any adjustments to our response to COVID-19. Additionally, information on the CARES Act, assistance programs, financial resources and programs that could help save energy and reduce energy expenses were provided through multiple channels in both Phase Zero and continuing into Phase One. The number of Columbia Gas customers with a payment arrangement dropped significantly once the pandemic began and has remained flat since that time. Columbia Gas will continue to offer information about extremely flexible payments to encourage customer participation in payment arrangements.

**Eversource:**

Since the pandemic began in mid-March, Eversource has leveraged a dedicated COVID-19 page on their website to provide important information and resources to customers, as well as

updated IVR messaging across customer segments. The company has regularly provided updates for customers via email including how operations have been adapted to changing conditions to best serve their customers, providing financial assistance resources and support for customers that are struggling, ways to save energy and reduce costs while staying home, and important tips for avoiding pandemic-related scams. Additionally, Eversource trained a dedicated team of customer service representatives and direct contact number to help connect business customers to pandemic relief resources from the CARES Stimulus funding at the federal and state level. In late June and early July, Eversource held three live webinars for small business customers which focused on extended payment arrangement offers, CARES assistance, and ways to reduce monthly energy costs by reviewing supplier rates and energy efficiency measures and tips.

In Massachusetts, the number of customers on a payment arrangement stayed relatively flat from May to June, with a 1% increase.

**National Grid:**

During Phase 0, National Grid's primary focus was on safety, and the impact of the pandemic on customers and communities, as well as on communications related to payment assistance programs, and avoidance of scams. As Phase 0 was implemented, National Grid continued to help customers to conserve energy and make them aware of available payment programs and services, as well as the various government programs and stimulus packages. National Grid regularly communicated with customers every ~10-14 days and a dedicated web page was continuously updated. Targeted communication appropriate for segmented customer groups was utilized to provide the most relevant information.

After completion of Phase 0, National Grid has seen positive impacts on customer sentiment, with the highest Ease and Trust scores achieved in three years. Approximately 72.1%

of National Grid's residential customers in Massachusetts rate the Company 8, 9, 10 on a 10 point scale on 'I believe the Company is doing the right thing for its customers, communities and employees during the pandemic. The Company has also seen a small, but positive, effect on its Accounts Receivables. Customers are responding to bill help and guidance resulting in increased enrollment in deferred payment plans.

**Liberty:**

Throughout Phase 0, Liberty used numerous communication channels to apprise customers of state-wide and company-specific COVID-19 initiatives. In particular, it regularly updated its website to include information regarding the suspension of disconnections and late fees, the availability of additional support through LIHEAP and other funding agencies, and energy efficiency tips. Liberty also used various social media platforms, posters, interactive voice response messaging, email, radio announcements, press releases, bill messages and newsletters to notify customers of the institution of shutoff moratoria and the closing of our walk-in center and to promote our enhanced Arrearage Management Plan and virtual home energy assessments and has employed targeted outbound calling to tout our special payment arrangements, participation in which had declined 86 percent as compared to June of last year.

**Unitil:**

In Phase 0, Unitil has utilized the following communications channels: press releases, bill inserts, letters to all customers, emails to those with email communications preference, letters to past due customers, automated outbound calls, and personal outbound calls. The communications included several key messages, including informing the customer of:

- the suspension of all collection activities, including disconnections and assessment of late fees, the availability of Local Community Action Program (“CAP”) agencies to help with programs such as LIHEAP Fuel Assistance,
- the introduction of the UCARE fund to assist customers impacted by COVID-19, a Unitil donation to local community agencies designed to help combat food insecurity, homelessness, mental health and substance abuse,
- Unitil’s availability to help with past due bills by setting payment plans to assist residential and commercial customers with their unique needs, and
- information that customers on payment plans will not receive late fees or face disconnection for the entire time they are on the plan, after normal business resumes in the future.

Lastly, Unitil encouraged customers who had Fuel Assistance during last winter season to enroll for this year’s benefit and low income discount rate, if necessary.

Through June, Unitil found that the number of customers on payment plans has decreased by 41% since the beginning of the pandemic, and by 64% when comparing enrollments to June 2019.

**B. Phase I Actions**

On July 24, 2020, the Distribution Companies began the assistance and reminders phase, Phase I, of the communication plan. Phase I allows for “soft” collection activities such as missed payment notifications. Throughout Phase I, the Distribution Companies will continue the awareness and education components of Phase 0.

**Berkshire Gas:**

Berkshire Gas completed a targeted outbound mailing to all “Past Due” commercial customers to communicate service disconnections for nonpayment and late payment fees have

been suspended, temporarily, due to the COVID-19 pandemic and that these account collection activities will continue to be suspended until the Department determines they can resume. The letter informs customers that they are still responsible for any balance due, but if they are having trouble paying their bill, longer payment plans up to 12-months with more flexible payment terms are available to help their customers stay current on their bills during this difficult time. The letter also communicated that no down payment was required on the payment plan, no late fees would be assessed for the duration of the plan, and there is no risk of service disconnection while on the payment plan. A similar targeted mailing to all “Past Due” residential customers is in progress. The residential letter includes information for various financial assistance programs that may pay a portion of their balance or forgive the full past due amount providing they meet the eligibility guidelines.

**CMA:**

Throughout Phase 1 Columbia Gas will continue to focus on payment assistance. The Company’s objective is notifying customers with past due amounts that there are numerous payment options available. The Phase 1 activities include a bill insert, newsletter articles about assistance programs, letters, web page updates, and targeted emails. These communications will repeat and reinforce the many types of assistance are available including flexible payment plans, information on the CARES Act, fuel assistance, arrearage forgiveness programs and discount rates, and virtual energy assessments available from the energy efficiency program.

**Eversource:**

Eversource’s efforts in sending communications to residential and commercial customers that have missed payments due to the pandemic are underway. Residential communication will also encourage customers to contact community action agencies regarding cooling resources, as

recommended by DOER. In partnership with National Grid and NCLC, Eversource is working on a series of residential customer webinars as an additional method to continue increasing awareness of hardship protections, payment programs including the arrears forgiveness program, ways to save energy and to further assist during the pandemic.

**National Grid:**

National Grid's Phase 1 continues to focus on payment assistance and reminders to commercial and residential customers who have missed payments for more than 30 days to educate them on flexible payment solutions to avoid accumulating arrearages. The Company's objective is to notify customers of past due amounts and educate them on flexible payment solutions. The Phase 1 activities include contacting customers by phone, email or direct mail to help them find the resources they need to help manage usage and pay their bills, either in full or through any number of assistance programs.

National Grid also continues to actively direct both residential and commercial customers to government aid programs offered through the CARES Act. The Company initiated Phase 1 in Massachusetts with outbound calls to the first group of commercial customers on July 27, 2020 and the first group of residential customers on July 28, 2020. The Company will continue to monitor customer sentiment and measure payment response to gauge success of the Phase 1 efforts.

**Liberty:**

During Phase 1, Liberty has continued many of customer education communications it undertook in Phase 0, while concentrating on promoting our enhanced Arrearage Management Plan, virtual home energy assessments and special payment arrangements. Encouragingly, the company's decision to enhance the AMP through increasing annual arrearage forgiveness and



introducing auto-enrollment has resulted in a year-over-year increase in participation of 120 percent.

**Unitil:**

In Phase I, Unitil utilized the following communications channels: letters, automated outbound calls, and personal outbound calls. The key messages included in the customer communications included information on: (1) the suspension of all collections activities including disconnections and assessment of late fees; (2) past due accounts; (3) the availability of extended payment plans, with no down payment, late fees or disconnection for the entire time they are on the plan; (4) the availability of special extended plans for low income customers; (5) the responsibility of customers for all current and past due balances, with encouragement to contact Unitil for assistance, (7) the availability of CAP agencies to help with programs such as UCARE and local/state/federal programs; and (8) a link to cooling stations.

**III. DETAILED COMMUNICATION MATRIX**

As discussed above, the Working Group has continued the collaborative process and developed a more detailed communication matrix provided as Appendix A. The communication matrix outlines more detailed levels of communications and provides the framework for communications between the Distribution Companies and their customers over the four-phase communication plan. Pursuant to the communication matrix, each distribution company would develop messages to be sent to customers.

The communication matrix details the Distribution Companies' targeted audience, customers with past-due accounts who would be eligible for disconnect notifications, and the distribution companies' plan for communicating with this audience. The key messages the

distribution companies wish to convey are: (1) extended payment arrangements are available for customers with a past due balance who request financial assistance during the pandemic; (2) additional help is available for residential customers with hardship-coded accounts; and (3) additional help is available to business customers.

In addition to providing the key messaging, the communication plan outlines the steps the distribution companies will take in each of the four phases in more detail, including how a distribution company may communicate with a customer. Lastly, the communication matrix provides an illustrative timeline of proposed additional credit customer communications.

#### **IV. CONCLUSION**

The distribution company members of the Working Group appreciate the Department's inquiry into customer assistance matters related to COVID-19 and the opportunity to work collaboratively to produce this Report.

Dated: August 4, 2020