

BACKGROUND

This supplemental customer communication plan is designed to further support the joint utility filing made on 5/29. The Massachusetts utilities provide this plan and key message detail as the Commonwealth begins reopening following the pandemic state of emergency and in advance of the end of the disconnect moratorium.

GOAL

To proactively and directly contact all customers, by customer segment, via multiple channels to increase their awareness and engage them in taking action to participate in the flexible payment programs and protections available to them during this pandemic, including extended payment plans. We will do this by:

1. Providing actionable, engaging messaging with a clear call to action for targeted groups of customers throughout all phases of the collections communications process.
2. Provide additional customer communication and notifications beyond what is provided under normal circumstances to enable enough time for customers to plan and act, and to prepare customers for when moratorium ends.

TARGET AUDIENCE

Customers with past-due accounts who would be eligible for disconnect notifications.

KEY MESSAGES:

If you are having trouble paying your bill, we can help.

1. Extended payment arrangements are available for customers with a past due balance who request financial assistance during the pandemic.
 - Customers can pay past-due balances in flexible payment plans up to 12 months, or longer for financially struggling customers.
 - For a limited time
 - Due to the state of emergency, disconnections are currently suspended, but when they resume, customers with an active payment arrangement are protected from service disconnection and late payment fees.
2. *Additional* help for Residential Customers with Hardship-Coded Accounts:
 - Financial Assistance Program options for eligible customers via Arrearage Management Program, other assistance
 - Ways to access CARES Stimulus and/or LIHEAP.
 - Ways to Save - via Energy Efficiency (through low-income programs administered by LEAN).
3. *Additional* help for Business Customers:
 - Ways to access CARES Stimulus funding.
 - Ways to Save - via Energy Efficiency.
 - TBD - Proposed Arrearage Forgiveness Program (to be filed with Department)

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Key messages are captured below for the additional COVID-Special Credit Notifications in proposed Phase 0 and Phase 1.

PHASE 0: AWARENESS & EDUCATION		
<i>New First Additional Notification for COVID; Manually-generated; Non-recurring; Sooner than normal system-automated notifications.</i>		
NOTIFICATION	TIMING	KEY MESSAGES MAY INCLUDE
1st NEW for COVID: Bill Health Awareness	<i>Current ~50+ days prior to first disconnects</i>	<ul style="list-style-type: none"> • If you are having trouble paying your energy bill, we want to help. • Consider enrolling in our special extended payment arrangement options: <ul style="list-style-type: none"> ○ Pay your past due balances over a period of up to 12 months (longer for financially struggling customers). ○ Helps to stay current on their energy bill during this difficult time ○ For C&I ONLY: If you make all your payments under the payment plan, no fees or interest will be charged while on the payment plan. (no interest or fees may be charged for residential customers) ○ If you make all your payments under the payment plan, service will not be shut off for the duration of your payment plan. ○ Company will not shut off service for non-payment for the duration of the moratorium • For residential hardship: encourage application and determination of eligibility for financial/energy assistance programs. • Reminder that customers are responsible for debts that accumulate • Contact us. You can also learn about other programs for which you may be eligible.
<p>Utilities may notify customers across additional channels, which may include:</p> <ul style="list-style-type: none"> • Direct Customer Communication - via email, letters and up-front IVR messaging • General Communication - via website, social and traditional media and employee communication. 		
PHASE 1: Assistance & Reminders		
<i>New Second Additional Notification for COVID; Manually-generated; Non-recurring; Sooner than normal system-automated notifications.</i>		
NOTIFICATION	TIMING	KEY MESSAGES MAY INCLUDE
2nd NEW for COVID: “Early Warning” shut off notification	<i>~38 days prior to first disconnects</i>	<ul style="list-style-type: none"> • Notice of missed payments • Share date disconnects will resume, by customer segment. • If you are having trouble paying your energy bill, we want to help. • Consider enrolling in our special extended payment arrangement options: <ul style="list-style-type: none"> ○ Pay your past due balances over a period of up to 12 months (longer for financially struggling customers). ○ Helps to stay current on their energy bill during this difficult time ○ For C&I ONLY: If you make all your payments under the payment plan, no fees or interest will be charged while on the payment plan. ○ If you make all your payments under the payment plan, service will not be shut off for the duration of your payment plan. ○ Company will not shut off service for non-payment for the duration of the moratorium • For residential hardship: encourage enrollment in financial/energy assistance programs. • Reminder that customers are responsible for debts that accumulate • Contact us. You can also learn about other programs for which you may be eligible.

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Utilities may notify customers across additional channels, which may include:

- Direct Customer Communication - via email, text, letters, up-front IVR messaging and **outbound calls**
- General Communication - via website, social and traditional media and employee communication.

PHASE 2: RESUME COLLECTIONS (SYSTEM-AUTOMATED NOTIFICATIONS)

Restart system-automated notifications across channels at regularly scheduled, pre-determined intervals normally used by the utility

NOTIFICATION	TIMING	KEY MESSAGES MAY INCLUDE
Multiple System-Generated notifications	~28 days + ~6 days prior to first disconnects	Utilize MA DPU Regulatory-Required Customer Notification Content, Channels and Timing used during normal non-moratorium periods, including: <ul style="list-style-type: none"> • Notice of potential disconnect to eligible customers. • Encourage assistance programs and payment plans to avoid service disconnection at moratorium end. • Contact us. You can also learn about other programs for which you may be eligible.

Illustrative EXAMPLE¹ Timeline of Proposed Additional Credit Customer Communication for COVID:

Working backwards from the example dates of first planned disconnects beginning by customer segment, the following table illustrates when the proposed additional credit customer notifications would be sent.

Customer Segment	IF PLANNED Disconnects Start	1 st COVID-Extra Notifications	2 nd COVID-Extra Notifications	++ <i>Normal Non-Moratorium MA DPU Required Notifications</i>
Business	9/1/2020	On or around July 13, 2020	On or around July 25, 2020	28-day ahead: on or about Aug 4, 2020 Final: Aug 26, 2020
Residential (Non-Hardship)	11/15/2020	On or around Sept. 26, 2020	On or around October 8, 2020	28-day ahead: Oct 19, 2020 Final: Nov 10, 2020
Residential Hardship	Spring 2021	2021 TBD	2021 TBD	2021 TBD

¹ On July 31, 2020, the Department issued D.P.U. 20-58-B allowing for Distribution Companies approving several proposals of the D.P.U. 20-58 Working Group regarding customer communications associated with the COVID-19 moratoria. The table above provides an illustrative example of timing for communications if the Working Group's proposed end of moratoria dates were approved by the Department. The Distribution Companies acknowledge the Department has not yet established the end of the Shut Off Moratorium for residential customers and the dates above may need to be revised depending on the Department's ultimate ruling on that issue.