## JERROLD OPPENHEIM

## 57 MIDDLE STREET GLOUCESTER, MASSACHUSETTS 01930-5736 USA +1 (978) 283-0897

## JerroldOpp@DemocracyAndRegulation.com www.DemocracyAndRegulation.com

December 17, 2020

Mark Marini, Secretary Department of Public Utilities One South Station, Fifth Floor Boston, Mass. 02110

RE: D.P.U. 20-75, Investigation by the Department of Public Utilities On Its Own Motion Into Electric Distribution Companies' (1) Distributed Energy Resource Planning and (2) Assignment and Recovery of Costs for the Interconnection of Distributed Generation.

Dear Secretary Marini,

Please accept this letter as the Comment in the above-captioned proceeding, filed pursuant to the Department's Order dated October 22, 2020 in D.P.U. 20-75, of the Low-Income Weatherization and Fuel Assistance Program Network (the Network), and reserving the right of Reply.

At this time the Network points out that cost allocations to ratepayers should be guided by G.L. c. 164, sec. 141, "Where the scale of on-site generation would have an impact on affordability for low-income customers, a fully compensating adjustment shall be made to the low-income rate discount."

Please let me know if there are questions about this filing.

Thank you.

Sincerely,

Copies:

DPU E-filing, Peter Ray Hearing Officer Katie Zilgme, Esq. (No Service List)