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# Example

- National Grid rate case, D.P.U. 23-150
- Proposal to alter the existing Low-Income Discount Rate (LIDR)
  - flat 32% rate to 5-tiered rate, based on income-level
- Request for cost recovery (through customer rates) for
  - marketing, education, and outreach efforts (\$3 million/annually); and
  - 10 new full-time staff (\$1.25 million/annually)



# Example informed by...

Stakeholder Working Group

Public Participation Proceedings

AGO Strategic Plan:

- “expand the reach of the AGO and make sure that our legal and advocacy work is informed by and reflects the needs of the communities and residents in every part of our state”
- “engage and be guided by communities affected by the work of the office”

<https://www.mass.gov/news/attorney-general-campbell-releases-strategic-plan-to-advance-opportunity-for-all-across-the-commonwealth>



# Qualitative Approach

- 45-60 minute interviews with 12 Massachusetts ratepayers
- Objectives:
  - Understand how customers are managing high bills & energy affordability
  - Understand awareness, sources of information, and pathways into energy affordability solutions
  - Map customer experiences and barriers applying for/enrolling in (a) LIDR, (b) HEAP/LIHEAP
  - Identify opportunities for utilities to better-reach and communicate with low-income customers



# Research Insights

- Constant juggle to pay all household bills
- Lack of awareness/unsure of awareness of the LIDR (4/12)
- Under-participation of eligible ratepayers
  - 4/12 were not participating
  - 3/12 unsure if they were participating
- Difficulty re-certifying eligibility (required annually)
- For enrolled ratepayers, high appreciation for the discount
- No participation in budget billing



# Research Insights

- Perception that “low-income” did not apply to the ratepayer
- Preference for terms other than “low-income,” such as “families in transition” and “below median income”
- Lack of familiarity with what certain terms mean, such as “arrearage management”
- Uncomfortably cold and hot indoor air temperatures
- Energy-limiting behaviors

Link to qualitative report:

<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/19085226>



# AGO Advocacy Based on Input

- Need for LIDR enrollment & re-enrollment to be easier for ratepayers
  - expanded auto-enrollment through data-sharing & categorical eligibility: approved by DPU
  - self-attestation pilot: approved; to be developed with AGO, low-income advocates
  - re-certification of income every 2 years: energy burden proceeding D.P.U. 24-15
- Use terms ratepayers can understand and relate to; avoid legalese (e.g., the term “arrearage”)
  - will be addressed in D.P.U. 24-15; informally adopted by one utility
- Need to standardize some program elements, terms, and program names, including arrearage/debt management programs
  - AGO advocacy in arrearage management plan proceedings, D.P.U. AMP-24



# Ongoing AGO Efforts

- Stakeholder Working Group (SWG)
- Public Participation Proceedings (D.P.U. 21-50, EFSB21-01)
- Proposed Intervenor Compensation Program (ICP)
  - included in Climate legislation that passed the Mass Senate last week
- Monthly Environmental Justice Advocates Calls
- Energy Consumer Liaison position (posting closes today)



# SWG Links/Resources

## Stakeholder Working Group (SWG)

- Overly Impacted and Rarely Heard: Incorporating Community Voices Into Massachusetts Energy Regulatory Processes:  
<https://www.mass.gov/doc/overly-impacted-and-rarely-heard-incorporating-community-voices-into-massachusetts-energy-regulatory-processes-swg-report/download>
- AGO Press Release announcing the release of the SWG Report, in collaboration with SWG member organizations:  
<https://www.mass.gov/news/group-convened-by-ag-s-office-releases-recommendations-to-improve-public-participation-in-energy-proceedings>



# Public Participation Proc. Links/Resources

DPU webpage on D.P.U. 21-50:

- <https://www.mass.gov/resource/enhancing-public-engagement>

EFSB webpage on EFSB 21-01:

- <https://www.mass.gov/info-details/efsb-21-01-notice-of-inquiry>

AGO Comments in Public Participation Proceedings:

- <https://www.mass.gov/lists/read-the-agos-comment-letters-to-eea-the-dpu-and-efsb>



# Proposed ICP Summary & Link

## The proposed legislation:

- Establishes an Intervenor Support Fund & Program to provide grants to intervenors with demonstrated financial hardship to pay for attorneys and experts
- Establishes a Division of Public Participation to administer the Program
- Establishes a statewide assessment mechanism
- Requires regulations by 3/1/26 (in consultation with EEA EJ Office and AGO)

Link: <https://malegislature.gov/Bills/193/S2967>



# Energy Consumer Liaison

- To support the Division by conducting outreach, engagement, and education for consumers and ratepayers
- Intended to help expand ERA's reach and help to ensure that the Division's legal and advocacy work is informed by, reflects, and responds to the needs of the Commonwealth's communities and their residents