



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: D.P.U. 24-15, Energy Burden, Electronic Distribution List

FROM: Jen Keegan, Hearing Officer

RE: Phase II Implementation Issues, Technical Conference on April 7, 2026

DATE: April 1, 2026

CC: Mark D. Marini, Department Secretary

I. INTRODUCTION

On January 4, 2024, the Department of Public Utilities (“Department”) issued a Vote and Order opening this inquiry to examine energy burden with a focus on energy affordability for residential ratepayers. The Department’s goals are to consider improvements to existing policies and programs that address energy affordability, to ensure maximum participation in each of these programs, and to determine whether additional programs may further benefit residential ratepayers of the Commonwealth’s electric and gas distribution companies. On May 16, 2025, following comments from stakeholders, a stakeholder workshop, an Interlocutory Order, and a technical conference addressing a target energy burden level and tiered discount rates, the Department issued two memoranda, one on each phase of the proceeding.

On February 17, 2026, the Department issued a Phase I Order on Tiered Discount Rates, D.P.U. 24-15-B (“Phase I Order”), directing the Distribution Companies to implement tiered discount rates (“TDRs”) with each tier designed to achieve a target energy burden. The Department directed the Distribution Companies to develop discounts for the lowest low-income tier (households earning less than or equal to 100 percent of the federal poverty limit (“FPL”)) to achieve a total energy burden of four percent: a two percent energy burden each for electric customers and gas heating customers and a 0.5 percent energy burden for gas non-heating customers. Further, to balance bill impacts, the Department directed the Distribution Companies to develop discounts for the remaining five low-income tiers (households earning more than 100 percent of FPL and less than or equal to 60 percent of state median income) to achieve a total energy burden of six percent: a three percent target energy burden each for electric

customers and gas heating customers and a 0.75 percent target energy burden for gas non-heating customers. The Phase I Order also directed the Distribution Companies to institute a discount floor of 15 percent for gas companies and 25 percent for electric companies for those low-income customers in the higher-income tiers who would otherwise receive no discount.

II. PHASE II

The Department directed Phase II issues, which include enrollment, outreach, documentation, eligibility and verification for a low-income discount rate (“LIDR”) to a stakeholder working group for discussion among stakeholders to reach consensus on best practices for implementation of the TDRs. Phase I Order at 7 n.7; see also Energy Burden Inquiry, D.P.U. 24-15, Hearing Officer Memorandum on Energy Burden Phase II Working Group (May 16, 2025) (announcing Phase II stakeholder working group).

III. MOTIONS FOR CLARIFICATION AND REQUESTS FOR A TECHNICAL CONFERENCE

On March 9, 2026, the Distribution Companies, collectively, and the Low-Income Weatherization and Fuel Assistance Program Network, the Low-Income Energy Affordability Network (“LEAN”), and the Massachusetts Energy Directors Association (“MEDA”) collectively, (“LEAN/MEDA”) filed Motions for Clarification of the Phase I Order. On March 16, 2026, LEAN/MEDA and the Conservation Law Foundation (“CLF”) filed responses to the motions (“LEAN/MEDA Response” and “CLF Response,” respectively). In their Motion, the Distribution Companies propose certain questions to address in a technical conference. In responsive comments filed March 16, 2026, LEAN/MEDA and CLF express support for a technical conference.

The Department has resolved the Motions for Clarification in a separate Order, D.P.U. 24-15-C, issued concurrently with this memorandum. The Department agrees that a technical conference is appropriate to address the remaining issues raised by the Distribution Companies, as discussed further below.

IV. SCOPE OF TECHNICAL CONFERENCE

As the Department noted in Order on Motions for Clarification, D.P.U. 24-15-C, the Distribution Companies have raised important implementation questions related to Phase II matters that have not yet been determined. Specifically, the Distribution Companies outlined the following Phase II questions in Appendix A of their Motion for Clarification:

1. If the household income verification information provided to the Distribution Companies does not include the income eligibility tier, what should the default tier be?
2. When a household income verification is performed for a customer who is already on a discount rate, when their income has changed and they are now only eligible

for a lower discount tier, should the customer be transitioned immediately to that lower tier discount?

3. Will there be discount rate tier reporting needed? If so, it would be most cost-effective to identify the reporting needs at this point so the Distribution Companies can most efficiently integrate those requirements into their respective discount rate tiers information technology projects.
4. If the Commonwealth of Massachusetts indication of household income data-matching and community action agency-provided HEAP tiers do not match, should Distribution Companies utilize the most recent household income verification indication?

Additionally, the Department seeks to discuss the following content, which was noted in a request for comments issued on March 31, 2026.

5. What are recommendations for an energy-focused “one stop shop” where customers could sign up for the discounted rate.
 - i. whether an energy-focused one-stop shop should be publicly or privately funded;
 - ii. how and where an energy-focused one-stop shop should be delivered (e.g., online, via hotline, and/or in person at a CAP office),
 - iii. types of services or programs that should be included in an energy-focused one-stop shop, and
 - iv. best practices for establishing energy-focused one-stop shops based on examples in the United States or in other countries.
6. How are community action agencies (“CAAs”) funded? Is funding restricted to federal and state grants or do other sources also fund CAAs? Are CAAs compensated for their work to sign customers up for energy efficiency programs, LIHEAP and the low-income discount? Do distribution companies provide funding to CAAs?
 - i. Describe any funding from distribution companies to CAAs in detail – what do the distribution companies fund and how is the funding provided?
 - ii. Do you support funding to assist the CAAs in their work to sign customers up for the low-income discount and other energy affordability programs?
 - iii. How would this funding be delivered to CAAs? Do you support expanding or eliminating the time period for signing up for low-income discounts by the CAAs? What amount of funding or expense by distribution companies and

their ratepayers would be appropriate to support CAAs with the expense of LIDR income verification?

- iv. How would the requisite funding change if the sign-up period were expanded or eliminated?
- v. Should CAAs be compensated for outreach and education expenses in service of reaching LIDR customers?

To learn more about and discuss the Company's questions, **the Department will conduct a virtual technical conference on Tuesday, April 7, 2026, beginning at 10:00 A.M.** and ending no later than 12:00 P.M. The Distribution Companies note that they may have questions in addition to those listed above (Distribution Companies Motion at 5). **If so, the Distribution Companies should provide all questions by Friday, April 3, 2026, at 5:00 P.M. by email to the Hearing Officer at jennifer.l.keegan@mass.gov.** Please note that the technical conference will not serve as a forum for rearguing or clarifying Phase I issues resolved by the Department in its Phase I Order and Order on Motions for Clarification.

V. LOGISTICS

A. Videoconferencing Platform and Public Access

The Department will conduct the technical conference via the Zoom videoconferencing platform. The Department invites all interested stakeholders to participate in the technical conference. Anyone who wishes to participate in the technical conference must provide their name and email address to Hearing Officer Jennifer Keegan at jennifer.l.keegan@mass.gov **no later than 5:00 P.M. on Friday, April 3, 2026**, and they will receive a Zoom participant link.

Any person may attend the technical conference as an observer by entering the link <https://us06web.zoom.us/j/86808265331> from a computer, smartphone, or tablet. No prior software download is required. For audio-only attendance, dial 1 305 224 1968 (not toll free) and then enter the Webinar ID: 868 0826 5331.

Observers who wish to provide comments or ask questions during the conference may use the Raise Hand function or dial *9, and the hearing monitor will move you to the participant level.

B. Technical Conference Format

The technical conference will begin at **10:00 A.M. on April 7, 2026**, and end no later than **12:00 P.M.**, unless otherwise directed by the Hearing Officer.

The technical conference will be available in English and Spanish. To request interpretation in a language other than English, please contact Paralegal Specialist Kaylee Burgess at dpu.ej@mass.gov no later than **5:00 P.M. on Friday, April 3, 2026**.

All participants are expected to make their appearances by video and identify themselves by their full name and organization affiliation. If a participant is unable to appear by video because of technical difficulties, the Hearing Officer will afford the participant a reasonable amount of time to resolve the technical difficulties. If the technical difficulties cannot be resolved after reasonable efforts are made, the Hearing Officer may direct the participant to appear by phone.

To ensure the efficient and orderly conduct of the technical conference, only Department staff and participants will appear on video and be able to unmute themselves. To reduce ambient noise and other disturbances, all participants must mute themselves unless they are speaking. The Hearing Officer will use Zoom audio controls to mute or unmute participants as necessary.

The Zoom videoconferencing platform will livestream the technical conference; the livestream will not be recorded and will not be part of the official record for this proceeding. The chat and record features of the Zoom videoconferencing platform will be disabled during the technical conference.

C. Hearing Monitor and Technical Assistance

The hearing monitor for the technical conference will be Kaylee Burgess, paralegal specialist. The hearing monitor will be granted host privileges. Please report any technical difficulties during the technical conference to Ms. Burgess at dpu.ej@mass.gov. For technical assistance questions prior to the technical conference, please contact Hearing Officer Jennifer Keegan at jennifer.l.keegan@mass.gov.

VI. QUESTIONS

For further information regarding this memorandum or to request addition to or removal from the electronic distribution list, please contact Hearing Officer Jennifer Keegan at jennifer.l.keegan@mass.gov. You may also leave a voice message with your name and phone number at (617) 305-3690.

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), contact the Department's ADA coordinator at eeadiversity@mass.gov or (617) 626-1282. To request translation or interpretation services, contact Paralegal Specialist Kaylee Burgess at dpu.ej@mass.gov.