Utility Consumer Rights Training

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National Consumer Law Center

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Overview of today’s training

- Establishing utility service, basic rules
- Triad Step 1: Protections
  - COVID-19 protections
  - Utility service protections
- Triad Step 2: Reducing Bills
- Triad Step 3: Paying Bills
- Other utility issues
- Q & A
Materials

- These slides
Intro and types of utilities covered today

- Electricity & gas (and some telecom, water)
- Investor-owned utilities (IOUs) and municipal utilities (munis)
- Department of Public Utilities (DPU) Consumer Division
  - (877) 866-5066
  - DPUCConsumer.Complaints@mass.gov
BASIC RULES/GETTING SERVICE

- Obtaining service
  - No deposit (except munis)
  - ID issues
  - Bills from prior address/“Cromwell” waiver:
    - Payment must be offered on prior arrears
- “Customer of record”
  - Bills in a child’s, partner’s or roommate’s name?
  - Deserted or deceased spouse?
BASIC RULES/GETTING SERVICE

- Termination rules:
  - Only Monday-Thursday, 8-4; no Sat., Sun., holiday, or day before holiday
  - No termination if dispute pending
  - Notices before termination for nonpayment:
    1) Initial bill
    2) second notice (day 27+)
    3) final notice (day 45+)
  - Final notice must give 72 hours notice before disconnection; good for 14 days
BASIC RULES/GETTING SERVICE

Reading bills:
- See example on following slides
- Look for rate letter/number, e.g., “Rate R-2”
- When in doubt, call company
# Eversource Bill

### Account Number:

Customer name key:*[redacted]*

HYDE PARK MA 02136

### Billing Cycle:

**07**

Service from **02/07/19 - 03/01/19**

22 Days

<table>
<thead>
<tr>
<th>Meter Number</th>
<th>Current Read</th>
<th>Previous Read</th>
<th>Current Usage</th>
<th>Reading Type</th>
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<tbody>
<tr>
<td>2833086</td>
<td>3757</td>
<td>3042</td>
<td>715</td>
<td>Actual</td>
</tr>
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</table>

### Monthly kWh Use

<table>
<thead>
<tr>
<th></th>
<th>Jun</th>
<th>Jul</th>
<th>Aug</th>
<th>Sep</th>
<th>Oct</th>
<th>Nov</th>
<th>Dec</th>
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</thead>
<tbody>
<tr>
<td>108</td>
<td>233</td>
<td>366</td>
<td>221</td>
<td>39</td>
<td>147</td>
<td>497</td>
<td></td>
</tr>
<tr>
<td>Jan</td>
<td></td>
<td>919</td>
<td>715</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Contact Information

Emergency: 800-592-2000

www.eversource.com

CustomerServiceMA@eversource.com

Pay by Phone: 800-592-2000

Customer Service: 800-592-2000

### Important Messages About Your Account

DIGGING? STATE LAW REQUIRES YOU OR YOUR CONTRACTOR TO CALL DIG SAFE AT 811 AT LEAST THREE BUSINESS DAYS PRIOR TO DIGGING. FOR MORE INFORMATION VISIT DIGSAFE.COM. IMPORTANT SAFETY INFORMATION IS ALSO AVAILABLE IN THE “SAFETY” SECTION OF EVERSOURCE.COM.

THIS BILL WAS PRORATED BECAUSE IT DOES NOT COVER A SINGLE NORMAL MONTH PERIOD.

### Electric Account Summary

**Total Amount Due by 04/07/19**

$260.91

**Electric Account Summary**

Amount Due On 03/08/19

Last Payment Received On 02/22/19

Balance Forward

**Current Charges/Credits**

- Electric Supply Services: $181.29
- Delivery Services: -$35.15
- Other Charges or Credits: $146.14

**Total Current Charges**: $114.77

**Total Amount Due**: $260.91

### Total Charges for Electricity

<table>
<thead>
<tr>
<th>Supplier (PROVIDER POWER)</th>
<th>Generation Service Charge</th>
<th>715 kWh x .14990</th>
<th>$107.18</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Subtotal Supplier Services</td>
<td></td>
<td>$107.18</td>
</tr>
<tr>
<td>Delivery (Rate A2 R2 RESIDENTIAL ASST)</td>
<td>Customer Charge (Prorated)</td>
<td></td>
<td>$5.13</td>
</tr>
<tr>
<td></td>
<td>Distribution Charge</td>
<td>715 kWh x .06396</td>
<td>$45.73</td>
</tr>
<tr>
<td></td>
<td>Transition Charge</td>
<td>715 kWh x .00052</td>
<td>-$0.37</td>
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<tr>
<td></td>
<td>Transmission Charge</td>
<td>715 kWh x .02585</td>
<td>$18.48</td>
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<tr>
<td></td>
<td>Revenue Decoupling Charge</td>
<td>715 kWh x .00057</td>
<td>-$0.41</td>
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<td></td>
<td>Distributed Solar Charge</td>
<td>715 kWh x .00088</td>
<td>$0.63</td>
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<tr>
<td></td>
<td>Renewable Energy Charge</td>
<td>715 kWh x .00050</td>
<td>$0.36</td>
</tr>
<tr>
<td></td>
<td>Energy Efficiency</td>
<td>715 kWh x .00363</td>
<td>$2.60</td>
</tr>
<tr>
<td></td>
<td>Assistance Rate Discount</td>
<td></td>
<td>-$64.56</td>
</tr>
<tr>
<td></td>
<td>Subtotal Delivery Services</td>
<td></td>
<td>$7.59</td>
</tr>
</tbody>
</table>

**Total Cost of Electricity**: $114.77
DID YOU FORGET TO PAY YOUR BILL?

If you have any questions, please call us at 1-866-211-1313 or if you have already paid, please disregard this notice.

ACCOUNT BALANCE

Previous Balance 2,196.02
Payment Received on MAY 30 (Credit Card) - 154.40
Balance Forward 2,041.62
Current Charges + 124.10

Amount Due $ 2,165.80

We are awaiting receipt of your HEAP guarantee. Once received your previous balance may be reduced by $ 446.00.

GO PAPERLESS: You'll help yourself and the environment by signing up to manage your bills online at www.nationalgridus.com/gopaperless.

DETAIL OF CURRENT CHARGES

Delivery Services

<table>
<thead>
<tr>
<th>Service Period</th>
<th>No. of days</th>
<th>Current Reading</th>
<th>Previous Reading</th>
<th>Total Usage</th>
</tr>
</thead>
<tbody>
<tr>
<td>May 2 - Jun 4</td>
<td>33</td>
<td>80056 Actual</td>
<td>78752 Actual</td>
<td>1294 kWh</td>
</tr>
</tbody>
</table>

METER NUMBER Residential Low Income R-2

NATURAL GAS: If you did not receive your bill within 2 days, please call 1-866-211-1313.

ACCOUNT NUMBER PLEASE PAY BY AMOUNT DUE

Jun 28, 2012 $ 2,165.80

ENTER AMOUNT ENCLOSED

Write account number on check and make payable to National Grid

In case of a charge that you believe to be incorrect, you may write your name and address on the back of your check and mail to:

National Grid
PO BOX 11737
NEWARK NJ 07101-4737

670x21

DATE BILL ISSUED Jun 4, 2012

DATE BILL DUE Jun 28, 2012

NATIONAL GRID

PO BOX 960
Northborough MA 01532
Case scenario

▪ Sheila Robinson comes into your office on December 10 and tells you that her family’s gas service was terminated around a month ago because she owes over $2,000 in back bills. She says that she has been unable to keep up with her bills and seems very depressed.

▪ She has a gas furnace and gas stove, so her family does not have heat, hot water, or the ability to cook. She owes about $800 on her electric bill and fears she will get a shut-off notice for that soon too, which would leave her family without light and refrigeration.

▪ Ms. Robinson’s family includes herself, her nine-year-old daughter, her seven-year-old son, her sister, and her sister’s newborn infant. The family’s income consists of TAFDC and her sister’s SSI check.
TRIAD STEP #1—PROTECTIONS

TRIAD STEP #2—REDUCING BILLS

TRIAD STEP #3—PAYING BILLS
TRIAD STEP #1: PROTECTIONS

- COVID-19 disconnection protections
  - No electric or gas disconnections allowed until July 1, 2021 or later
  - Each year, low-income households have a “winter moratorium” protection on Nov. 15 (coming up on later slide), other protections may also apply
  - Regulated water service also protected until July 1, 2021 or later
  - Municipal utilities may have voluntary protections (check with utility)
TRIAD STEP #1: PROTECTIONS

- Serious illness
  - Is someone seriously ill? Ask for ANY physical or mental illness.
  - Any letter from doctor/P.A./N.P. is enough to protect service or get service restored.
  - Company must challenge letter if it questions.
  - Letters good 90 days (can be renewed) or 180 days (chronic); financial hardship required.
  - Service can be restored, should seek the protection ASAP and within 90 days of utility disconnection.
TRIAD STEP #1 PROTECTIONS

- Winter Moratorium
  - Applies from Nov. 15 and March 15
  - Winter moratorium on terminating heat-related service, Nov. 15 to March 15 and usually extended to April 1
  - Must demonstrate financial hardship.
  - Service restored if terminated during moratorium.
TRIAD STEP #1 PROTECTIONS

- Infant under 12 months
  - Is there a child under 12 months in the home?
  - Protection time-limited.
  - Must demonstrate financial hardship.
  - Prevents termination and restores service.
TRIAD STEP #1 PROTECTIONS

- Financial hardship forms:
  - Example on next slide
  - Utility companies have them available
  - Technically, expire within 3 months
Appendix C
Sample Financial Hardship Form

This Eversource form is provided as an example only. Advocates and customers should contact the utility company or municipal utility directly for the most updated version of the financial hardship form and other forms.

Eastern Massachusetts Form

Eversource
Financial Hardship Form

If you are claiming a "Financial Hardship" (under Massachusetts General Laws, Chapter 164, Section 124f), please fill out this form and return it to: Eversource, 247 Station Drive NW203, Westwood, MA 02090-9203 or fax it to 781-441-3685.

Name: ____________________________________________
Address: __________________________________________
Telephone #: _____________________________________
Account Numbers: Gas: ________________________ Electric: ________________________
Number of People Living in Household: __________
Total income for all household members before taxes (should include all sources such as Wage, Social Security, EIVDC, Child Support, etc.).

Per Month: ______________ or Per Year: ______________

Financial Statement

I certify that the above information is complete and true to the best of my knowledge.

Signature ___________________________ Date _____________

<ACCOUNT NUMBER>
413-9191 Form>
TRIAD STEP #1 PROTECTIONS

- Elder protections
  - Are all adults in the home 65 or over? (Minor = under the age of 18)
  - Notify the company. No terminations allowed unless utility gets DPU approval. **No financial hardship required.**
  - No termination AT ALL if low-income.
  - Utility companies must provide 3rd party notice, on request
TRIAD STEP #1 PROTECTIONS

▪ Protections for Elders: WARNING!
  ▪ Utility companies may take liens on homeowners
  ▪ Get legal advice/assistance
# Summary of Protections

## Eligibility for Key Protections Against Termination

<table>
<thead>
<tr>
<th>Protection</th>
<th>Requirements</th>
</tr>
</thead>
</table>
| **Elderly**     | • All adult household members must be 65 or older.  
                   • Household must notify company.  
                   • No proof of financial hardship required; company must get individual permission of DPU to terminate.  
                   • If there is a financial hardship, termination absolutely prohibited. |
| **Serious Illness** | • Must show that someone (customer or family member) is seriously ill, by submitting letter from doctor/nurse practitioner or physician’s assistant.  
                   • Must demonstrate financial hardship.  
                   • Serious illness letter must be renewed every 90 days (or every 180 days for a “chronic” illness). |
| **Winter Moratorium** | • Applies to gas (if used to heat) or electricity (if used to operate furnace, boiler, thermostats, or heating controls).  
                   • Runs from November 15th – March 15th (often extended).  
                   • Must demonstrate financial hardship. |
| **Infant**      | • An infant under the age of 12 months must be living in the household.  
                   • Must submit birth certificate, baptismal certificate, or other reasonable proof of age.  
                   • Must demonstrate financial hardship. |
5-Minute Break!
TRIAD STEP #2: REDUCING BILLS

- Discount rates (regulated electric & gas):
  - Can save 25% to 36% on bills
  - Must apply or via fuel assistance or auto enrollment
  - Receipt of fuel assistance, public/subsidized housing, food stamps, SSI, veterans’ benefits, may qualify you (Note: Customer of record)
  - COVID-19: temporary self-certification allowed
  - Retroactive discounts: contact NCLC for help
TRIAD STEP #2: REDUCING BILLS

• Payment plans
  • All companies must offer payment plans (prior to termination)
    • Prior to COVID-19, at least 4 months
    • During COVID-19 crisis, 12 months, longer if needed
  • Post-termination payment plans: less defined.
  • “Cromwell” waivers
  • NEVER offer more than you can afford.
  • Get help negotiating any plan.
TRIAD STEP #2: REDUCING BILLS

- Arrearage management programs (AMPs)
  - All utility companies must offer to all low-income customers in arrears
  - Customer makes equal payments/like a budget plan
  - Arrearage credits applied monthly

- COVID-19 changes to AMPs:
  - Expanded eligibility – additional opportunities to participate
  - More debt can be forgiven
TRIAD STEP #2: REDUCING BILLS

- Budget plans
  - All companies must offer budget plans
  - Can be helpful in avoiding huge bills
  - May still lead to “catch up” bills
Case scenario - Discussion

▪ Sheila Robinson comes into your office on December 10 and tells you that her family’s gas service was terminated around a month ago because she owes over $2,000 in back bills. She says that she has been unable to keep up with her bills and seems very depressed.

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▪ Ms. Robinson’s family includes herself, her nine-year old daughter, her seven-year old son, her sister, and her sister’s newborn infant. The family’s income consists of TAFDC and her sister’s SSI check.
TRIAD STEP #3: PAYING BILLS

- LIHEAP/fuel assistance
- RAFT
- Energy Efficiency
- Weatherization Assistance Program (WAP)
- HEARTWAP program
- Utility programs
- Local resources
Putting Theory Into Practice

- Resolving disputes:
  - ALWAYS call utility company first
  - Gather bills and info
  - Call DPU if not satisfied
  - VERY informal process—Don’t be put-off!
  - Call “back-up” when needed
Competitive Supply Companies

- May sell electricity or gas
- Door to door marketing and telemarketing, often misrepresenting the identity of the company and the prices
- Usually more expensive
- Contact NCLC
- Complaints accepted by Attorney General and DPU
Where to file complaints about competitive suppliers:

- Department of Public Utilities (DPU) Consumer Division
  - (877) 866-5066
  - DPUConsumer.Complaints@mass.gov
- Attorney General Consumer Complaint Line
  - 617-727-8400 (M-F, 8am-4pm)
  - https://www.mass.gov/how-to/file-a-consumer-complaint (for link to complaint form)
Account Number: 
Customer name key: 

HYDE PARK MA 02136

Billing Cycle: 07
Service from 02/07/19 - 03/01/19  22 Days

<table>
<thead>
<tr>
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<th>Current Read</th>
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Monthly kWh Use

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<th>Jun</th>
<th>Jul</th>
<th>Aug</th>
<th>Sep</th>
<th>Oct</th>
<th>Nov</th>
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<tr>
<th>Jan</th>
<th>Feb</th>
<th>Mar</th>
</tr>
</thead>
<tbody>
<tr>
<td>512</td>
<td>919</td>
<td>715</td>
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Contact Information
Emergency: 800-592-2000
www.eversource.com
CustomerServiceMA@eversource.com
Pay by Phone: 800-592-2000
Customer Service: 800-592-2000

Critical Message About Your Account
DIGGING? STATE LAW REQUIRES YOU OR YOUR CONTRACTOR TO CALL DIG SAFE AT 811 AT LEAST THREE BUSINESS DAYS PRIOR TO DIGGING. FOR MORE INFORMATION VISIT DIGSAFE.COM. IMPORTANT SAFETY INFORMATION IS ALSO AVAILABLE IN THE “SAFETY” SECTION OF EVERSOURCE.COM.

This bill was prorated because it does not cover a single normal month period.

Total Amount Due by 04/07/19 $260.91

Electric Account Summary
Amount Due on 03/08/19 $181.29
Last Payment Received On 02/22/19 -$35.15
Balance Forward $146.14
Current Charges/Credits
Electric Supply Services $107.18
Delivery Services $7.59
Other Charges or Credits $0.00
Total Current Charges $114.77
Total Amount Due $260.91

Total Charges for Electricity
Supplier (PROVIDER POWER)
Generation Service Charge 715 kWh X .14990 $107.18
Subtotal Supplier Services $107.18
Delivery (Rate A2 R2 RESIDENTIAL ASST)
Customer Charge (Prorated) $5.13
Distribution Charge 715 kWh X .06396 $45.73
Transition Charge 715 kWh X -.00086 $-0.37
Transmission Charge 715 kWh X .02585 $18.48
Revenue Decoupling Charge 715 kWh X -.00057 $-0.41
Distributed Solar Charge 715 kWh X .00088 $0.63
Renewable Energy Charge 715 kWh X .00050 $0.36
Energy Efficiency 715 kWh X .00363 $2.60
Assistance Rate Discount $64.56
Subtotal Delivery Services $7.59
Total Cost of Electricity $114.77
**CURRENT BILL ITEMIZED**

In 30 days you used 47 therms:
- Mar 18 2018 reading ACTUAL: 0880
- Feb 14 2018 reading ACTUAL: 0834
- CCF Used for METER: 0006152751
- Thermal Factor: 46
- Total therms used: 47

Your Cost is determined as follows:
- Minimum Charge: $10.00
- $0.3333 per day for 30 days: 0.83
- First 40.0 therms @ $0.4313: 17.25
- Next 0.0 therms @ $0.5160: 0.00
- Distribution Adjustment: 3.61
- 47 therms x 0.34180 per therm: 16.06

GAS DELIVERY CHARGE: $46.92

**TOTAL CURRENT CHARGES**: $46.92

**SUMMARY OF CHARGES**

- Amount Due Last Bill: 100.27
- Your Total Payments Since Last Bill: 100.27
- Total Current Charges: $46.92
- ESCO Total Current Charges: 39.99

Please Pay Upon Receipt: $80.82

**GAS USE HISTORY**

<table>
<thead>
<tr>
<th>Days</th>
<th>Times</th>
<th>Therms</th>
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</thead>
<tbody>
<tr>
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<td>47</td>
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<tr>
<td>Mar 18</td>
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<td>Mar 18</td>
<td>30 Act</td>
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<td>Feb 18</td>
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<td>64</td>
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<tr>
<td>Feb 17</td>
<td>31 Act</td>
<td>69</td>
</tr>
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</table>

**Charges from ESCO(s):**
- SFE Energy Massachusetts Consumption: 47
- Prior: $0.849
- Current Gas Charges: $39.90
- Total ESCO Charges: $39.90

**IMPORTANT MESSAGES**

Pay your bills online. Get started today at ngrid.com/payonline. For free, online access to your gas account, here is your unique access code: FS10276. Just visit us online, click "My Account" and register your account.

Record-breaking cold and your energy bill. A prolonged period of extreme cold this winter is impacting bills with increased usage and higher natural gas supply prices. We have programs and services that can help. Visit ngrid.com/winterbills for details.
Removing yourself from the “eligible customer list”

- Eversource
  - If you do not want your information included, contact Eversource at 866-746-1110 or fill out an online form (https://www.eversource.com/content/ema-c/residential/my-account/billing-payments/choose-competitive-alternate-supplier)
  - Register with the Federal Trade Commission's Do Not Call list
Removing yourself from the eligible customer list

▪ National Grid
  ▪ To opt out, fill out an on-line form at https://www9.nationalgridus.com/masselectric/business/forms/5_opt_out.asp
  ▪ Or call National Grid Customer Service
  ▪ Register with the Federal Trade Commission's Do Not Call list
Lifeline is a federal program that provides free or low-cost phone or internet service to low-income households through a monthly service discount of up to $9.25.

Choice of:
- (1) home phone service;
- (2) home internet service, where available;
- (3) wireless phone service; or
- (4) a wireless internet service (a data plan).

Verizon, Safelink (Tracfone) and other companies offer Lifeline discounts for one or more of these services:
- Landline telephone
- Mobile phone (may include limited voice minutes and unlimited texts, 4.5GB data, etc.)
- Home internet

Only one Lifeline service per low-income household, and only one individual in the household

Some eligibility rules waived until June 30, 2021 due to COVID-19 (see mass.gov/dtc)

Landline phone shut off protections (for certain land lines)
- Serious illness rules; personal emergency; elder rules; payment plans available
Questions?

Contact us at stayconnected@nclc.org
Since 1969, the nonprofit National Consumer Law Center® (NCLC®) has worked for consumer justice and economic security for low-income and other disadvantaged people, including older adults, in the U.S. through its expertise in policy analysis and advocacy, publications, litigation, expert witness services, and training. www.nclc.org