Utility Consumer Rights Course

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Last Updated: 6/24/2025

stayconnected@nclc.org

Overview of Today's Training

Establishing Utility Service: Basic Rules

The "Three-Step Approach"

Step 1: Utility Service Protections

Step 2: Reducing Bills

---- 3 Minute Break

Step 3: Paying Bills

Other Utility Issues

Latest recording and course materials updated here

Materials



<u>Utilities Advocacy for Low-Income</u> <u>Households in Massachusetts</u>

Additional helpful resources and information about future events

Intro and Types of **Utilities** Covered **Today**

Electricity & Natural Gas

Investor-Owned Utilities (IOUs)

Municipal Utilities (munis)

Some Telecom, Water & Broadband

Department of Public Utilities (DPU) Consumer Division

(877) 866-5066

DPUConsumer.Complaints@mass.gov



Basic Rules / Getting Service

Obtaining service



- No deposit (except munis)
- ID issues SSN not required
- Bills from prior address/"Cromwell" waiver:
 - Payment must be offered on prior arrears
 - HEAP households must be allowed to pay no more than 25% of arrears to start new service or be reconnected

"Customer of record"



- Only the person with their name on the bill is responsible
- Bills in a child's, partner's or roommate's name?
- Deserted or deceased spouse?





Rules for Termination of Electric and Gas Utility Service

Termination rules:

- Only Monday-Thursday, 8am-4pm
- No termination on weekends, state or federal holidays, or day before holidays
- No termination if dispute pending
- Notices before termination:
 - Initial bill
 - second notice (day 27+)
 - final notice (day 45+)
- Final notice must give 72 hours notice; good for 14 days

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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

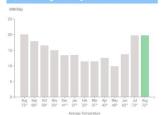






Statement Date: MM/DD/YY

Service Provided To: JOHN J CUSTOMER



This month your electric use was

than at the same time last year

This month you used 1.5 USAGE -

\$114.92 by MM/DD/YY Amount Due On MM/DD/YY Last Payment Received On MM/DD/YY Balance Forward \$0.00



News For You

On Aug. 1, the average customer using 600 kWh per month will see a decrease of approximately 4% or \$5 as new energy supply rates take effect. If your bill contains usage prior to Aug. 1, your cost of energy will reflect pricing from July and August. Manage your bill at Eversource.com/manage-cost. A new Electric Vehicle Program charge appears in the Delivery section of your bill. This new charge is effective July 1, 2024 and enables utilities to recover costs for programs that support the development and deployment of electric vehicle charging infrastructure in the Commonwealth.

Remit Payment To: Eversource, PO Box 56007, Boston, MA 02205-6007

Delivery

EVERS=URCE

Account Number: 0000 000 0000

JOHN J CUSTOMER

ANY STREET ANY TOWN MA 00000-0000 Please make your check payable to Eversource or to make your payment today visit Eversource.com. If mailing your payment, please allow up to 5 business days to post to your account.

Total Current Charges

\$114.92

Amount Enclosed

Front

PO Box 56007 Boston, MA 02205-6007

Eversource

EVERSURCE

Account Number: 0000 000 0000

Customer name key: CUST Statement Date: MM/DD/YY

Service Provided To: JOHN J CUSTOMER

Svc Addr: Any Street

Any Town. MA 00000-0000

Rate R2-Res Non-Heating Assistance Cycle 12 Service from MM/DD/YY - MM/DD/YY 30 Days Next read date on or about: MM/DD/YY

Meter	Current	Previous	Current	Reading
Number	Read	Read	Usage	Type
000000000	99097	98505	592	

Service Reference: 000000000

Monthly kWh Use

Aug	Sep	0ct	Nov	Dec	Jan	Feb
601	537	528	433	401	444	319
Mar	Apr	May	Jun	Jul	Aug	
341	388	284	465	591	592	

Contact Information

Emergency: 800-592-2000 www.eversource.com Pay by Phone: 888-783-6618 Customer Service: 800-592-2000

Total Amount Due \$114.92 by MM/DD/YY

Electric Account Summary

Amount Due On MM/DD/YY \$119.87 Last Payment Received On MM/DD/YY -\$119.87 Balance Forward \$0.00 Current Charges/Credits Electric Supply Services \$78.00 Delivery Services \$36.92 **Total Current Charges** \$114.92 **Total Amount Due** \$114.92

Total Charges for Electricity

Supplier (NAME OF SUPPLIER)

Meter 0000000 Generation Service Charge 19 kWh X .15522 \$2.95 Generation Service Charge 573 kWh X .13098 \$75.05 Subtotal Supplier Services \$78.00

R2-Res Non-Heating Assistance

Customer Charge		\$10.00
Distribution Charge	276 kWh X .09442	\$26.06
Distribution Charge	316 kWh X .07820	\$24.7
Transition Charge	592 kWh X -0.00037	-\$0.22
Transmission Charge	592 kWh X .04052	\$23.99
Net Meter Recovery Surcharge	316 kWh X .01622	\$5.13
Revenue Decoupling Charge	592 kWh X .00006	\$0.04
Distributed Solar Charge	592 kWh X .00800	\$4.74
Renewable Energy Charge	592 kWh X .00050	\$0.30
Energy Efficiency Charge (CLC)	592 kWh X .04148	\$24.56
Electric Vehicle Program	592 kWh X .00138	\$0.82
Assistance Rate Discount		-\$83.2
Subtotal Delivery Services		\$36.92

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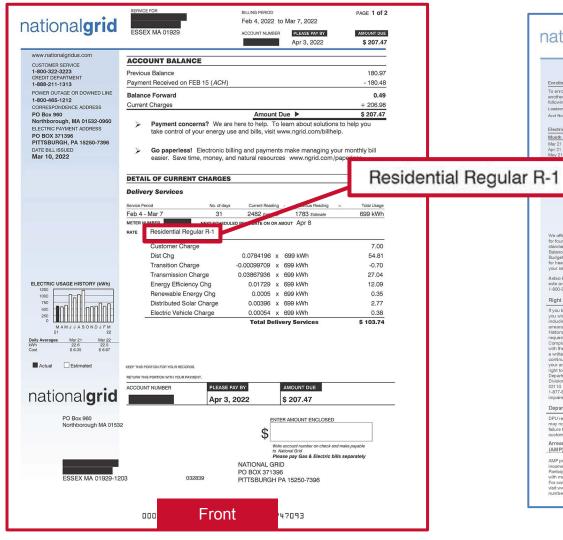
R2-Res Non-Heating Assistance

Eversource is required to comply with Department of Public Utilities' billing and termination regulations. If you have a dispute please see the bill insert for more information.

For an electronic version of this insert, residential customers go select "Monthly Bill Inserts" from the page. Budget Billing is also



usiness customers go to Eversource.com/about-business-bill. Then th. Please see the Customer Rights Supplement for more information.





BILLING PERIOD

PAGE 2 of 2 Feb 4, 2022 to Mar 7, 2022

PLEASE PAY BY Apr 3, 2022

AMOUNT DUE

\$ 207,47

103.60

-\$ 0.36

\$ 103.60

Supply Services

To enroll with a supplier or change to SUPPLIER National Grid

another supplier, you will need the following information about your account Loadzone NEMA/BOST

Acct No:

Enrollment Information

kWh Month 609 Oct 21 581 Nov 21 642 Dec 21

Basic Service Fixed Other Charges/Adjustments

> Paperless Billing Credit -0.36 Total Other Charges/Adjustments

0.14821 x 699 kWh

Total Supply Services

We offer a wide variety of payment plans for four or more months, including the standard plan, negotiated plans, and Balanced Billing.

Budget or Balanced Billing is a great plan for heating customers that helps balance your seasonal bills.

Aviso importante! Si usted no entiende este aviso. Ilame a la compania al: 1,800,322,3223

Right to Dispute Your Bill

If you believe your bill is inaccurate or you wish to dispute all or part of your bill including the time over which your arrearage is to be paid, please contact: National Grid at 1-800-322-3223 and request an investigation by a Company Complaint Officer. If you are not satisfied with the written decision or did not receive a written decision within 30 days, or if you continue to dispute the time over which your arrearage is to be paid, you have a right to appeal to the Massachusetts Department of Public Utilities, Consumer Division One South Station Boston MA 02110. Telephone 617-737-2836 or 1-877-886-5066 or TTY (for the hearing impaired only) 1-800-439-2370.

Department of Public Utilities

DPU regulations provide that a company may not terminate electric service for failure to pay any portion of a bill when a customer complaint or appeal is pending. Arrearage Management Program (AMP)

AMP provides arrears forgiveness to income-qualified residential customers. Participants must accept and stay current with monthly Budget Billing payments. For complete details and an application, visit www.nationalgridus.com or call the number on the front.

Explanation of General Billing Terms

KWH+ Kilowatt-hour a hasic unit of electricity used Off-Peak: Period of time when the need or demand for electricity on the Company's system is low, such as late evenings, weekends and holidays.

on the Company's system is high, normally during the day, Monday through Friday, excluding holidays Estimated Bill: A bill calculated on your typical monthly usage rather than on an actual meter reading, usually rendered because we are unable to read your meter Meter Multiplier: A number by which the usage on certain meters must be multiplied by to obtain the total usage. Demand Charge: Cost of providing electrical distribution owners of solar systems. equipment to accommodate your largest electrical load. Supplier Service Charges consist of:

Generation Charge: The charge(s) to provide electricity to the customer by a supplier Delivery Service Charges are comprised of: Customer Charge: The cost of providing customer related services such as metering, meter reading and billing. These electronic fund transfer from your account for the same

Distribution Charge: The cost of delivering electricity from process the copy of your check. the beginning of the Company's distribution system to your

Right To Electric Service

If you have a financial hardship you (or anyone presently and normally living in your home) have a Right to Electric Service in the following situations:

· During serious illness: Contact your registered physician, physician assistant, nurse practitioner or local Board of Health official and have them telephone the Company immediately at 1-888-211-1313. Within seven (7) • Elderly Household: If all residents in your household days of the phone call your registered physician, physician are 65 years of age or older; the Company cannot assistant, nurse practitioner or local Board of Health official terminate your service for failure to pay a past due bill must certify in writing, to the Company, that serious illness without the approval of the Massachusetts Department of exists. The certificate protects against termination for 90 days (180 days if chronic illness) and may be renewed. Your failure to renew such certification of serious illness as

Transition Charge: Company payments to its wholesale supplier for terminating its wholesale arrangements. Transmission Charge: The cost of delivering electricity from the generation company to the beginning of the Peak: Period of time when the need or demand for electricityCompany's distribution system. Energy Efficiency Charge: The cost of energy efficiency

program services offered by the Company. Renewable Energy Charge: A charge to fund initiatives which foster the formation, growth, expansion and retention of renewable energy and related enterprises. Distributed Solar Charge: Recovers the cost of the Massachusetts solar program, including payments to

Electric Vehicle Charge: Recovers the cost of the Electric Vehicle Program, including rebates for installation of EV charging infrastructure and for off peak charging. Notice About Electronic Check Conversion: By sending your completed, signed check to us, you authorize us to use the account information from your check to make an costs are unaffected by the actual amount of electricity you be processed for technical reasons, you authorize us to amount as the check. If the electronic fund transfer cannot

. You have a child under twelve monthsold living in the home

- . All adults in the home are age 65 or older and a minor also resides in the home
- . Between November 15 and March 15 if your service is heat related.
- Public Utilities (DPU). . For additional information on the right to electric service, please contact our Credit Department at set out above may result in your service being terminated. 1-888-211-1313 or visit www.nationalgrid.com

If you have questions or complaints regarding this bill or National Grid's service quality, please contact Customer Service at 1.800.322.3223 Vou may also contact the Massachusetts Department of Public Utilities, Consumer Division at 617-737 aired only) 1-800-439-2370 or web site www.mas

Back

Case Scenario

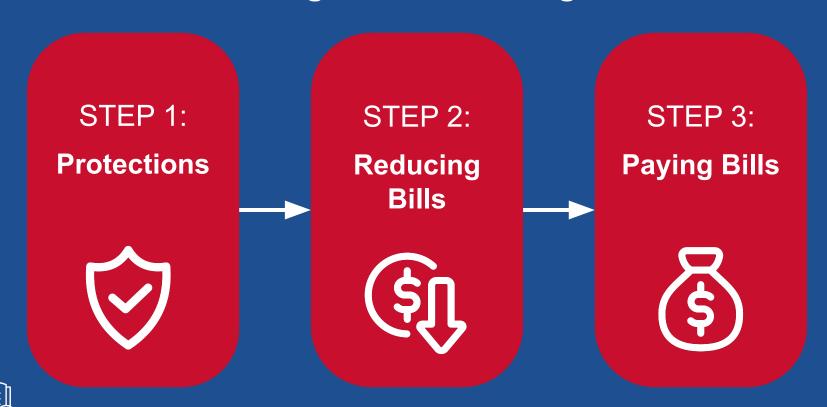
 Sheila Robinson comes into your office on December 10 and tells you that her family's gas service was terminated around a month ago because she owes over \$2,000 in back bills.
 She says that she has been unable to keep up with her bills and seems very depressed.



- 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.



The "Three Step Approach" to Restoring and Maintaining Service



Step 1: Protections

Financial hardship forms:

- Proof of financial hardship is required for most protections from utility shut-off
- Example on next slide
- Utility companies have them available
- Technically, expire within 3 months





Sample Financial Hardship Form

EVERS@URCE Eversource, 247 Statlon Drive, NW200, Westwood, MA 02090

FINANCIAL HARDSHIP FORM

If you have a financial hardship and:

- · You or a member of your household have a serious illness or,
- . There is a child under 12 months of age in your household or.
- . You are age 65 or older living with minors (all members are over 65 and all other occupants must be under
- You use electric or gas to heat your home and it is between November 15th and March 15th.

Eversource will not shut off your service if you meet any of the above criteria and have the proper paperwork on file, including this completed Financial Hardship Form, Eversource will help you work out a payment plan. Please call us at 866-861-6225.

Name:				
Street Address:				
City:		State:	Zip:	_
Account Number:		_		
Telephone Number:_				-
Number of people in l	nousehold:			
Total household incor	me (before taxes): \$			
The information abov	e is the truth, to the best o	of my knowle	dge.	
Date:	Signature:			

Links:

- **National Grid:**
 - Electric
- Eversource

NOTE: Not all companies have an online form - call company directly to request.



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 at DPU if it questions
- <u>Letters</u> 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







Step #1: Protections

Winter Moratorium

- In effect from Nov. 15 to March 15
- Winter moratorium on terminating heat-related service,
 Nov. 15 to March 15 (usually extended to April 1)
- Must demonstrate financial hardship
- Service restored if terminated during moratorium







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







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 approval from DPU. No financial hardship required.
- No termination at all if low-income
- Utility companies must provide 3rd party notice, on request
- Caution re Liens: Utility companies may take liens on homeowners (seek additional support to learn if homestead exemption or other protections apply)







Summary of Protections



PROTECTION	REQUIREMENT
Elders All adult household members must be 65 or older. Household must notify company. No proof of financial hardship required; company must get DPU permission to termina IF there is a financial hardship, termination is absolutely prohibited. Must show that someone (customer or family member) is seriously ill by submitting a from doctor/nurse practitioner or physician's assistant. Must demonstrate financial hardship. Letter must be renewed every 90 days or every 180 days for a "chronic" illness.	
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.

Discount rates (regulated electric & gas):

- Can save 25% to 71% on bills
- Eligibility: Receipt of benefits, e.g., HEAP/fuel assistance, public/subsidized housing, SNAP, TAFDC, SSI, veterans' benefits



- Eligibility determination:
 - Apply directly, or
 - HEAP/ fuel assistance or
 - Auto enrollment if TAFDC, SNAP, MassHealth, and EAEDC
- Companies put customers on discount "on demand" (M.G.L. c. 164, §1F(4)(ii))
- Retroactive discounts: contact NCLC for help





Coming Soon: Tiered Discount Rate National Grid Electric

% of Federal Poverty Level (FPL)	Discount %
0 to 100% FPL	71%
100 to 125% FPL	64%
125 to 150% FPL	57%
150 to 200% FPL	43%
200% FPL to 60% SMI	32%



Arrearage management programs (AMPs)

- All utility companies must offer to all low-income customers in arrears
- Customer makes equal monthly payments (budget plans next slide)
- Arrearage credits applied monthly

Terms of AMPs?

- Each utility is slightly different (e.g., Eversource cap of \$12,000, Berkshire Gas cap of \$3,000)
- Different options to re-enroll after dropping out of AMP, may have to make up some missed payments
- Summary of AMP terms by company.







Budget plans

- Spreads out estimated usage into equal payments that periodically adjust based on actual usage
- All companies must offer budget plans
- Can be helpful in avoiding huge bills
- May still lead to "catch up" bills







Payment plans

- All companies must offer payment plans (prior to termination)
 - At least 4 months
 - Utilities may be flexible
- Post-termination payment plans: less defined
- "Cromwell" waivers
- Make sure payment plan is reasonable and affordable









3-Minute Break

Step #3: Paying Bills

- HEAP/Fuel assistance
 - Online application
 - Cold Relief brochure
- RAFT (Residential Assistance for Families in Transition)
 - Rental Assistance central application
 - Can be used for utility arrears if shut off notice
- Energy Efficiency
 - Contact local HEAP/Fuel Assistance program or Mass Save
- Weatherization Assistance Program (WAP)
- HEARTWAP program
- Utility programs
- Local resources







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.



Putting Theory Into Practice

Consult resources

- <u>Utilities Advocacy for</u>
 <u>Low-Income Households</u>
 <u>in Massachusetts</u>
- Latest <u>Utility Consumer</u>
 <u>Rights Course</u> recording
 and updated materials

Resolving disputes:

- Call the utility company first
- Gather bills and information
- Contact DPU Consumer Division if not satisfied:
 - **–** (877) 866-5066
 - <u>DPUConsumer.Complaints@mass.gov</u>
- Informal process, customers and non-attorney advocates may file complaints





Different Ways to Buy Electric and Gas Supply

Either one of these -

Utility company (distribution utility, IOU)

Community Choice Aggregation (CCA, municipal aggregation)

Non-utility energy supply company (competitive supply company)

Or this, in some areas -

Municipal Utilities in some cities and towns (e.g., Braintree, Chicopee, Holyoke, Middleborough, North Attleborough, Peabody, Reading, Wakefield, etc.)



Competitive Energy Supply — Buyer Beware

- Mass. deregulated its electricity supply market in 1997 and market for gas soon after that
- Purpose of deregulation was to spur innovation and competition but not what has resulted
- The individual market for competitive energy supply is almost always a bad deal. Large & numerous losers. Small & rare winners.
 - Municipal aggregation is different—where municipalities buy in bulk from a supplier; is often in fact cheaper for consumers
 - City of Boston municipal aggregation info
- Mass. AGO report found that individual residential customers who received their electricity from competitive suppliers paid over \$577 million more on their bills since 2015





Predatory Energy Supply Sales

- Targeting of vulnerable populations—elders, LEP individuals, low-income communities
- Reverse redlining, targeting communities of color
- Use of deceptive tactics in door-to-door marketing and telemarketing
 - Misrepresentations that marketer is from or associated with the utility
 - Misrepresentations that customer will save money
- Slamming Switching customers without knowledge or consent
- Community and Rooftop Solar legitimate subsidized programs exist, but so do predatory and deceptive sales practices.





HYDE PARK MA 02136

ervice fro	m 02/07/19	9 - 03/01/19	22 Days	
Meter Number	Gurrent Read	Previous Read	Current Usage	Reading Type
2833086	3757	3042	715	Actual

Jun	Jul	Aug	Sep	Oct	Nov	Dec
108	233	366	221	39	147	497
Jan	Feb	Mar				
512	919	715			10-40-40 30000 014-000-400	

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.

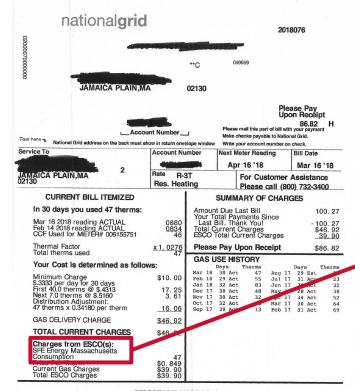
Total Amount Due by 04/07/19

\$260.91

Electric Account Summary	
Amount Due On 03/08/19	\$181.29
Last Payment Received On 02/22/19	-\$35.1 5
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

Generation Service Charge	715 kWh X .14990	\$107.18
Subtotal Supplier Services		\$107.18
Delivery (Rate A2 R2 RESIDENTIAL AS	ST)	
Customer Charge (Prorated)		\$5.13
Distribution Charge	715 kWh X .06396	\$45.73
Transition Charge	715 kWh X00052	-\$0.37
Transmission Charge	715 kWh X .02585	\$18.48
Revenue Decoupling Charge	715 kWh X00057	-\$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



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: F91627C.
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.

Charges from ESCO(s): SFE Energy Massachusetts Consumption

Protecting a Utility Account

Eversource

- To block your account from being switched without authorization, contact Eversource at 866-746-1110 or 800-592-2000
- Register with the <u>Federal Trade Commission's Do Not Call list</u>





Removing Yourself From the Eligible Customer List

National Grid

- To opt out, fill out an <u>online form</u>
- Or call National Grid Customer Service
- Register with the <u>Federal Trade Commission's Do Not Call list</u>





Where to file complaints about competitive suppliers:

Department of Public Utilities (DPU) Consumer Division

(877) 866-5066

<u>DPUConsumer.Complaints@mass.gov</u>

Attorney General Consumer Complaint Line

617-727-8400 (M-F, 8am-4pm)

Complaint Form

Water Service for Tenants

Tenant only pays water bill if all are met:

- Landlord has installed submeters that measure actual water used in the apartment;
- Landlord has installed low-flow fixtures;
- Previous tenant was not forced out;
- There is a written rental agreement that spells out water bill arrangements; and
- Landlord has filed proper certification.

M.G.L. c. 186, section 22 (MLRI Summary)





Telephone & Internet Service

- Lifeline still active
- Affordable Connectivity Program ended June 1, 2024







Lifeline Program

- Free or low-cost phone or internet service to low-income households through a monthly service discount of up to \$9.25
- Eligible households receive one discount for:
 - Home or wireless phone service; or
 - Home internet or a wireless phone data plan
- Eligibility:
 - Household income at or below 135% FPL
 - Eligibility up to 200% FPL if survivor of DV or trafficking (<u>Safe Connections Act of 2022</u>, 47 U.S.C.A. § 345)
 - Program-based eligibility (MassHealth, SNAP, SSI, Federal Public Housing Assistance, Certain Tribal Assistance Programs, and Veteran's Pension or Survivor's Pension benefit)
 - More <u>eligibility and application information</u>





Regulated land line phone protections

Mass. Department of Telecommunications and Cable administers phone shut off protections

- Applies to regulated landlines only
- Serious illness rules; personal emergency; elder protection rules
- Payment plans available

Rules at <u>DPU docket 18448</u> (1977)





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