



**Consumer Law Essentials - Energy and
Utility Consumer Protections: How to
Help Consumers Avoid Utility
Disconnections and Debt and the ABCs of
Solar Panel Consumer Protections**

March 25, 2025

2:00 p.m. - 4:15 p.m.



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Basic Rights of Utility Consumers

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National Consumer Law Center

March 25, 2025



National
Consumer Law
Center

*Fighting Together
for Economic Justice*

Contact:
stayconnected@nclc.org

Overview of today's training

- Establishing utility service, basic rules
- Step 1: Utility Service Protections
- Step 2: Reducing Bills
- Step 3: Paying Bills
- Other utility issues
- Q & A

Materials

- Recording
- *Utilities Advocacy for Low-Income Households in Massachusetts*
- *Course materials as well as information about future events, available at <http://bit.ly/stay-connected-training>*

Intro and types of utilities covered today

- Electricity & gas
- Investor-owned utilities (IOUs) and municipal utilities (munis)
- Department of Public Utilities (DPU) Consumer Division
 - (877) 866-5066
 - DPUCustomer.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
 - HEAP households must be allowed to pay no more than 25% of arrears to start new service or be reconnected
- “Customer of record”
 - 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:
 - 1) Initial bill
 - 2) second notice (day 27+)
 - 3) final notice (day 45+)
 - Final notice must give 72 hours notice; good for 14 days
- 220 CMR 25.02

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

Account Number: 0000 000 0000

Statement Date: MM/DD/YY

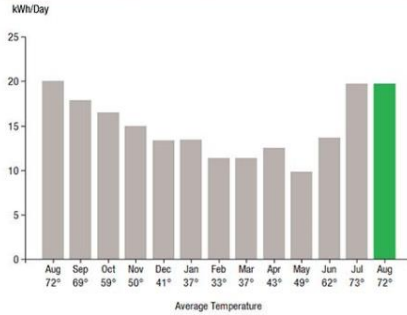
Service Provided To:
JOHN J CUSTOMER

Total Amount Due
by MM/DD/YY

\$114.92

Amount Due On MM/DD/YY	\$119.87
Last Payment Received On MM/DD/YY	-\$119.87
Balance Forward	\$0.00
Total Current Charges	\$114.92

Electric Usage History - Kilowatt Hours (kWh)



Electric Usage Summary

This month your average daily electric use was **19.7 kWh**. This month you used **1.5% less** than at the same time last year.



Current Charges for Electricity

Supply
\$78.00

Cost of electricity from ABC Company

Delivery
\$36.92

Cost to deliver electricity from Eversource



Your electric supplier is

ABC Company
PO BOX 000
ANY TOWN 00000
000-000-0000

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](https://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

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EVERSOURCE

Account Number: 0000 000 0000

Total Amount Due
by MM/DD/YY

\$114.92

Amount Enclosed

JOHN J CUSTOMER
ANY STREET
ANY TOWN MA 00000-0000

Eversource
PO Box 56007
Boston, MA 02205-6007

000000000000 0000000000 0000000000

EVERSOURCE

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 Number	Current Read	Previous Read	Current Usage	Reading Type
00000000	99097	98505	592	Actual

Service Reference: 00000000

Monthly kWh Use						
Aug	Sep	Oct	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
by MM/DD/YY

\$114.92

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 00000000		
Generation Service Charge	19 kWh X .15522	\$2.95
Generation Service Charge	573 kWh X .13098	\$75.05
Subtotal Supplier Services		\$78.00

Delivery

R2-Res Non-Heating Assistance

Meter 00000000		
Customer Charge		\$10.00
Distribution Charge	276 kWh X .09442	\$26.06
Distribution Charge	316 kWh X .07820	\$24.71
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		-\$83.21
Subtotal Delivery Services		\$36.92

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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 to Eversource.com/about-residential-bill and business customers go to Eversource.com/about-business-bill. Then select "Monthly Bill Inserts" from the page. Budget Billing is also available to pay a more consistent bill each month. Please see the Customer Rights Supplement for more information.

www.nationalgridus.com
 CUSTOMER SERVICE
 1-800-322-3223
 CREDIT DEPARTMENT
 1-888-211-1313
 POWER OUTAGE OR DOWNED LINE
 1-800-465-1212
 CORRESPONDENCE ADDRESS
 PO Box 960
 Northborough, MA 01532-0960
 ELECTRIC PAYMENT ADDRESS
 PO BOX 371396
 PITTSBURGH, PA 15250-7396
 DATE BILL ISSUED
 Mar 10, 2022

ACCOUNT BALANCE

Previous Balance	180.97
Payment Received on FEB 15 (ACH)	- 180.48
Balance Forward	0.49
Current Charges	+ 206.98
Amount Due	\$ 207.47

- **Payment concerns?** We are here to help. To learn about solutions to help you take control of your energy use and bills, visit www.ngrid.com/billhelp.
- **Go paperless!** Electronic billing and payments make managing your monthly bill easier. Save time, money, and natural resources www.ngrid.com/paperless.

DETAIL OF CURRENT CHARGES

Delivery Services

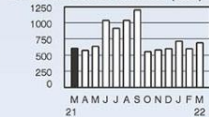
Service Period	No. of days	Current Reading	Previous Reading	Total Usage
Feb 4 - Mar 7	31	2482 Estimate	1783 Estimate	699 kWh

METER NUMBER [REDACTED] NEXT SCHEDULED READ DATE ON OR ABOUT Apr 8

RATE Residential Regular R-1

Customer Charge		7.00
Dist Chg	0.0784196 x 699 kWh	54.81
Transition Charge	-0.00099709 x 699 kWh	-0.70
Transmission Charge	0.03867936 x 699 kWh	27.04
Energy Efficiency Chg	0.01729 x 699 kWh	12.09
Renewable Energy Chg	0.0005 x 699 kWh	0.35
Distributed Solar Charge	0.00396 x 699 kWh	2.77
Electric Vehicle Charge	0.00054 x 699 kWh	0.38
Total Delivery Services		\$ 103.74

ELECTRIC USAGE HISTORY (kWh)



Daily Averages	Mar 21	Mar 22
kWh	22.6	22.5
Cost	\$ 6.05	\$ 6.67

■ Actual □ Estimated

PO Box 960
 Northborough MA 01532

ESSEX MA 01929-1203

KEEP THIS PORTION FOR YOUR RECORDS.

RETURN THIS PORTION WITH YOUR PAYMENT.

ACCOUNT NUMBER [REDACTED]	PLEASE PAY BY Apr 3, 2022	AMOUNT DUE \$ 207.47
---------------------------	------------------------------	-------------------------

ENTER AMOUNT ENCLOSED
 \$ [REDACTED]

Write account number on check and make payable to National Grid
 Please pay Gas & Electric bills separately

NATIONAL GRID
 PO BOX 371396
 PITTSBURGH PA 15250-7396

032839

000020698 [REDACTED] 000020747093

Enrollment Information

To enroll with a supplier or change to another supplier, you will need the following information about your account:
 Loadzone NEMA/BOST
 Acct No: ██████████ Cycle: 8, MACC

Electric Usage History

Month	kWh	Month	kWh
Mar 21	609	Oct 21	559
Apr 21	581	Nov 21	585
May 21	642	Dec 21	606
Jun 21	1040	Jan 22	721
Jul 21	919	Feb 22	606
Aug 21	1040	Mar 22	699
Sep 21	1205		

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.

Also important! Si usted no entiende este aviso, llame a la compañía 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.

Supply Services

SUPPLIER National Grid

Basic Service Fixed	0.14821 x 699 kWh	103.60
Total Supply Services		\$ 103.60

Other Charges/Adjustments

Paperless Billing Credit	-0.36
Total Other Charges/Adjustments	-\$ 0.36

Explanation of General Billing Terms

KWH: Kilowatt-hour, a basic 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.
Peak: Period of time when the need or demand for electricity 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 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 costs are unaffected by the actual amount of electricity you use.
Distribution Charge: The cost of delivering electricity from the beginning of the Company's distribution system to your

home or business.
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 Company'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 owners of solar systems.
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 electronic fund transfer from your account for the same amount as the check. If the electronic fund transfer cannot be processed for technical reasons, you authorize us to process the copy of your check.

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) days of the phone call your registered physician, physician assistant, nurse practitioner or local Board of Health official must certify in writing, to the Company, that serious illness 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 set out above may result in your service being terminated.

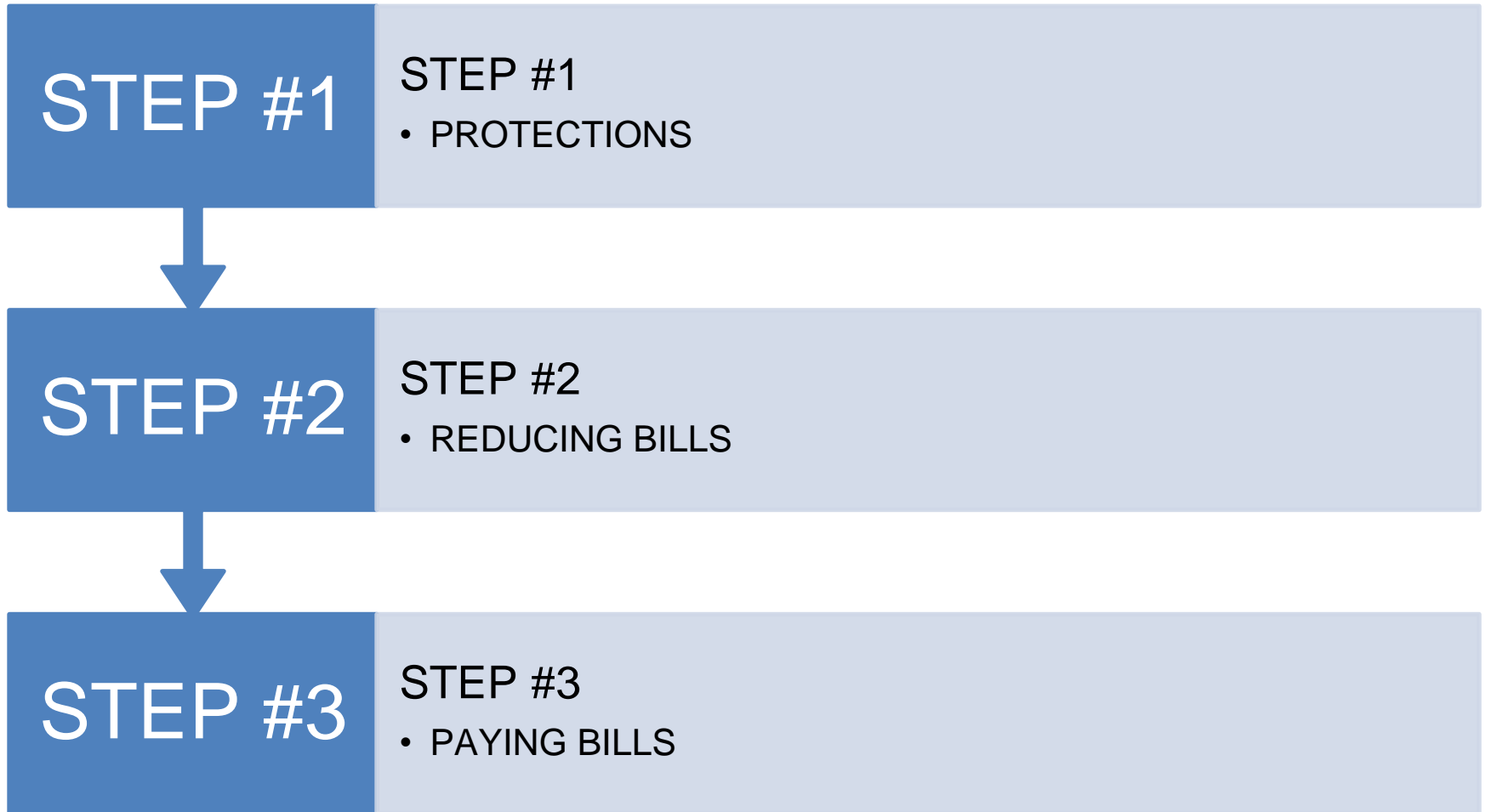
- You have a child under twelve months old living in the home.
- All adults in the home are age 65 or older and a minor also resides in the home.
- Between November 15 and March 15 if your service is heat related.
- Elderly Household: If all residents in your household are 65 years of age or older, the Company cannot terminate your service for failure to pay a past due bill without the approval of the Massachusetts Department of Public Utilities (DPU).
- For additional information on the right to electric service, please contact our Credit Department at 1-888-211-1313 or visit www.nationalgrid.com

Questions:

If you have questions or complaints regarding this bill or National Grid's service quality, please contact Customer Service at 1-800-322-3223. You may also contact the Massachusetts Department of Public Utilities, Consumer Division at 617-737-2836 or toll free at 1-877-886-5066, TTY (for the hearing impaired only) 1-800-439-2370 or web site www.mass.gov/dpu.

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.



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 form¹⁵

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 NW200, Westwood, MA 02090-9230 or fax it to 781-441-3686.

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 Wages, Social Security, TAFDC, 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>

(518 FH Form)

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 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

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

STEP #1 PROTECTIONS

- Elder Protections, continued
 - 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 Protections²¹

PROTECTION	REQUIREMENT
Elders	<ul style="list-style-type: none"> • <u>All</u> adult household members must be 65 or older. • Household must notify company. • <u>No</u> proof of financial hardship required; company must get DPU permission to terminate. • <u>IF</u> there is a financial hardship, termination is absolutely prohibited.
Serious Illness	<ul style="list-style-type: none"> • Must show that <u>someone</u> (customer or family member) is seriously ill by submitting a <u>letter from doctor/nurse practitioner or physician's assistant</u>. • Must demonstrate financial hardship. • Letter must be renewed every 90 days or every 180 days for a "chronic" illness.
Winter Moratorium	<ul style="list-style-type: none"> • Applies to gas (if used to heat) or electricity (if used to operate furnace, boiler, thermostats, or heating controls). • Runs from November 15 – March 15 (often extended). • Must demonstrate financial hardship.
Infant	<ul style="list-style-type: none"> • 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.

STEP #2: REDUCING BILLS

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
 - Auto enrollment for SNAP is forthcoming
- Companies put customers on discount “on demand” (M.G.L. c. 164, §1F(4)(ii))
- Retroactive discounts: contact NCLC for help

National Grid²³ electric tiered discount, DPU 23-150

National Grid electric discount rates

Table: Roberto Scalese/WBUR Source: Massachusetts Department of Public Utilities Created with [Datawrapper](#)

Annual income for a family of 4	Discount rate
Up to \$31,200	71%
Between \$32,200 - \$39,000	64%
Between \$39,000 - \$46,800	57%
Between \$46,800 - \$62,400	43%
Between \$62,400 - \$94,600	32%

STEP #2: REDUCING BILLS

- Payment plans
 - All companies must offer payment plans (prior to termination)
 - At least 4 months
 - Post-termination payment plans: less defined
 - “Cromwell” waivers
 - Make sure payment plan is reasonable and affordable

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
- 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:
<https://bit.ly/IOU-AMP-rules>.

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

STEP #3: PAYING BILLS

- HEAP/Fuel assistance
 - Online application at <https://toapply.org/MassHEAP>
 - Cold Relief brochure at <https://www.mass.gov/doc/fy-2025-cold-relief-brochure/download>
- RAFT (Residential Assistance for Families in Transition)
 - Rental Assistance central application
 - Can be used for utility arrears
- Energy Efficiency
 - Contact local HEAP/Fuel Assistance program or Mass Save
- Weatherization Assistance Program (WAP)
- HEARTWAP program
- Utility programs
- Local resources

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.
- 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
 - *Utilities Advocacy for Low-Income Households in Massachusetts* - <https://www.nclc.org/resources/utilities-advocacy-for-low-income-households-in-massachusetts-2019-4th-edition/>
- Resolving disputes:
 - Call the utility company first
 - Gather bills and information
 - Contact DPU Consumer Division if not satisfied:
 - (877) 866-5066
 - DPUCustomer.Complaints@mass.gov
 - Informal process, customers and non-attorney advocates may file complaints

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
- Not the same as “municipal aggregation” or “community choice aggregation”
- Contact NCLC
- Complaints accepted by Attorney General and DPU

Different ways³¹ 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:
<https://www.boston.gov/departments/environment/community-choice-electricity>
- 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,
<https://www.mass.gov/competitive-electric-supply>

Look at a bill ³³ to figure out if someone has a competitive supplier

EVERSOURCE

Account Number: [REDACTED]
Customer name key: [REDACTED]
HYDE PARK MA 02136

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

Meter Number	Current Read	Previous Read	Current Usage	Reading Type
[REDACTED]	3757	3042	715	Actual

Monthly kWh Use

Jun	Jul	Aug	Sep	Oct	Nov	Dec
108	233	366	221	39	147	497
Jan	Feb	Mar				
512	919	715				

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 -\$35.15
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 -.00052 -\$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

nationalgrid

JAMAICA PLAIN, MA 02130

Account Number [REDACTED]

Please Pay Upon Receipt **\$6.82** H

Please mail this part of bill with your payment
Make checks payable to National Grid.

Tear here → National Grid address on the back must show in return envelope window Write your account number on check.

Service To	Account Number	Next Meter Reading	Bill Date
JAMAICA PLAIN, MA 02130	2	Apr 16 '18	Mar 16 '18

Rate R-3T Res. Heating For Customer Assistance Please call (800) 732-3400

CURRENT BILL ITEMIZED

In 30 days you used 47 therms:

Mar 16 2018 reading ACTUAL 0880
Feb 14 2018 reading ACTUAL 0634
CCF Used for METERS [REDACTED] 46

Thermal Factor x1.0279
Total therms used 47

Your Cost is determined as follows:

Minimum Charge \$10.00
\$.3333 per day for 30 days 17.25
First 40.0 therms @ \$.4313 3.61
Next 7.0 therms @ \$.5160 3.61
Distribution Adjustment: 47 therms x 0.34190 per therm -16.06

GAS DELIVERY CHARGE \$46.92

TOTAL CURRENT CHARGES \$46.92

Charges from ESCO(s):
SFE Energy Massachusetts Consumption 47
Price Per Therm \$0.849
Current Gas Charges \$39.90
Total ESCO Charges \$39.90

SUMMARY OF CHARGES

Amount Due Last Bill 100.27
Your Total Payments Since Last Bill. Thank You! -100.27
Total Current Charges \$46.92
ESCO Total Current Charges -39.90
Please Pay Upon Receipt **\$6.82**

GAS USE HISTORY

Days	Therms	Days	Therms
Mar 18 30 Act.	47	Aug 17 29 Act.	23
Feb 18 29 Act.	55	Jul 17 31 Act.	23
Jan 18 32 Act.	83	Jun 17 30 Act.	32
Dec 17 30 Act.	48	May 17 28 Act.	38
Nov 17 30 Act.	32	Apr 17 34 Act.	52
Oct 17 32 Act.	18	Mar 17 30 Act.	64
Sep 17 30 Act.	13	Feb 17 31 Act.	69

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.

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.

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 Federal Trade Commission's Do Not Call list

Removing yourself from the³⁶ eligible customer list

- National Grid
 - To opt out, fill out an on-line form at <https://www.nationalgridus.com/MA-Home/Energy-Choice/Opt-Out-of-Supplier-List>
Or call National Grid Customer Service
 - Register with the Federal Trade Commission's Do Not Call list

Where to file complaints about competitive suppliers:

- Department of Public Utilities (DPU)
Consumer Division
 - (877) 866-5066
 - DPUCustomer.Complaints@mass.gov
- Attorney General Consumer Complaint
Line
 - 617-727-8400 (M-F, 8am-4pm)
 - <https://www.mass.gov/how-to/file-a-consumer-complain> (for link to 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;
 - Tenancy started on or after March 16, 2005
 - 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

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
 - Program-based eligibility (MassHealth, SNAP, SSI, Federal Public Housing Assistance, Certain Tribal Assistance Programs, and Veteran's Pension or Survivor's Pension benefit)
 - Eligibility up to 200% FPL if survivor of DV or trafficking (Safe Connections Act of 2022, 47 U.S.C.A. § 345)
 - More eligibility and application information at <https://www.lifelinesupport.org/do-i-qualify/>

Regulated land line phone⁴⁰ protections

- Mass. Department of Telecommunications and Cable administers phone shut off protections
 - Applies to regulated land lines only
 - Serious illness rules; personal emergency; elder protection rules
 - Payment plans available
- Rules at DPU docket 18448 (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

The ABCs of Solar Panel Consumer Protections



Jenifer Bosco
Berneta Haynes
March 25, 2025

Jenifer Bosco

Jenifer Bosco is a senior attorney at the National Consumer Law Center (NCLC), focusing on energy and utility issues that affect low-income consumers, and medical debt collection issues. Leading NCLC's energy work, Jenifer has advocated for low-income consumers in several states and has worked on transportation electrification policy and competitive energy supply issues.

Jenifer is a contributing author to NCLC's treatise, *Access to Utility Service*. She co-wrote NCLC's Model Medical Debt Protection Act, and is a contributing author to NCLC's *Collection Actions* treatise, *Unfair and Deceptive Acts and Practices* treatise, and other NCLC publications. She has co-authored two reports for Lawrence Berkeley National Labs, *Advancing Equity in Utility Regulation*, and *The Future of Transportation Electrification: Utility, Industry and Consumer Perspectives*.

Prior to joining NCLC, she was the first director of the Office of Patient Protection at the Massachusetts Health Policy Commission. Previously, Jenifer advocated for health care needs of low-income individuals at Health Law Advocates, advocated for low-income clients at the Massachusetts Law Reform Institute and Merrimack Valley Legal Services/Northeast Legal Aid, and served as an assistant attorney general in Massachusetts. She is a graduate of Georgetown University Law Center and Boston College.





Berneta L. Haynes

Berneta L. Haynes is a senior attorney who focuses on consumer energy policy and medical debt. At NCLC, she recently authored [*Tariff-based On-Bill Financing: Assessing the Risks for Low-Income Consumers*](#) and [*Community Solar: Expanding Access and Safeguarding Low-Income Families*](#). She is also a contributing author to NCLC's *Access to Utility Service* treatise. Before joining NCLC, she served as a director at Georgia Watch, a state-based consumer advocacy organization in Atlanta, where she worked to make energy programs, quality healthcare, financial protection, and civil justice more equitable and accessible for all. At Georgia Watch, she authored policy guides on energy equity (including *Keeping the Lights On* and *EMCs and Energy Equity: Harnessing Your Power*). Previously, she practiced law at Environmental Law and Policy Center in Chicago and Southern Environmental Law Center, where she authored *Solar for All* and other policy papers. She earned her Bachelor's degree in English, Writing, and Psychology from Drury University, her Master's degree in English from University of Iowa, and her law degree from University of Iowa College of Law.

Speakers will provide:

1. An overview of rooftop solar and common risks for low-income households.
1. Policy/program recommendations to ensure low-income households are protected.
1. An overview of community solar and policy/program recommendations to protect low-income households.

Rooftop Solar 101⁴⁷

Parties involved:

- Solar company
- Salesperson
 - May work for a third-party marketing company
- Solar installer/Contractor
- Finance company
- Broker for financing
- Utility
- State Regulators

Types of rooftop solar contracts:

- Sale (homeowner owns the panels)
 - Financing through seller
 - Separate financing
- Lease
- Power Purchase Agreement (PPA)

Rooftop Solar

Solar panel basics:

- Connected to the electric grid - the panels don't directly power the home
- Owner of the panel is compensated with "net metering credits," which appear as credits on the electric bill at a rate set by the state's utility commission, usually equal to the retail price of electricity
- System includes the panels and an inverter, which connects the system to the electric grid
- The utility must "interconnect" the panels to the grid

System costs:

- Component cost has become lower in recent years, but many consumers are not benefitting
- Should be approximately \$3/Watt
- Instead of D2D sales, advisable to get multiple quotes through a service such as energysage.com or other sources

Common Rooftop Solar Consumer Problems

Deceptive sales practices:

- Overstating potential energy savings
- Understating the costs to the consumer
- Misrepresenting the availability of tax credits to low-income homeowners who do not owe any taxes
- Falsely asserting that the solar panel sale is part of a “government program”
- High-pressure marketing aimed at older consumers and homeowners with limited English proficiency
- Over-hyping an initial year or short period of relatively low financing payments, masking the higher bills consumers will owe for the remaining years

50 Rooftop Solar Problems, cont.

Contract issues:

- Excessive and unnecessary fees, including additional flat fees (beyond the monthly cost for the solar energy credited to the electric bill), late payment fees, termination fees, and sign-up fees
 - Example: [State of Minnesota v. GoodLeap Inc.](#), No. 27-CV-24-3558 (D. Minn. 2024), *available at* www.ag.state.mn.us. See also Press Release, Attorney General Keith Ellison, Attorney General Ellison sues solar lenders over \$35M in deceptive hidden fees (Mar. 8. 2024), *available at* www.ag.state.mn.us.
- Impermissible credit checks, which can harm consumer credit scores
- Contracts that waive consumer rights and remedies, limiting access to recourse if problems arise
- Arbitration clauses

Installation issues:

- Faulty installation
- Company goes out of business

Is rooftop solar always a bad deal for consumers?

- a) Yes
- b) No
- c) Not sure



Potential claims in litigation

- Unfair or deceptive acts and practices: Misrepresentations, Failure to disclose right to cancel, etc.
 - Mass. G.L. c. 93A
 - Mass. Home Improvement Contractor Statute (HICA), Mass. G.L. c. 142A, § 17
 - Massachusetts Retail Installment Sales Act (RISA), Mass. G.L. c. 255D, § 1 et seq.
 - Mass. Home Solicitation Sales Act, Mass. G.L. c. 93, § 48
 - FTC Cooling-Off Rule, 16 C.F.R. pt. 429
 - Truth in Lending Act, 15 U.S.C. §§ 1601–1666j
- Contract issues: Breach of contract, Contract formation issues, etc.
 - Is agreement enforceable? Electronic signature valid under federal E-Sign law (15 U.S.C. 7001) or Uniform Electronic Transactions Act (Mass. G.L. c. 110G, §§ 1-18)? Not an affirmative claim.

Tips from litigators: documents to obtain from client or in discovery include...

- ALL versions of ALL contracts
- Docusign audit trail (look up the IP address to check for for ISP match <https://dnschecker.org/ip-location.php>)
- Emails/texts
- Business cards
- Documents submitted to state energy programs (e.g., Mass. SRECs)
- UCC financing statement
- Inspection/approval documents (incl. Engineering Procurement & Construction or EPC documents)
- Welcome call/verification call including recording
- Other recorded calls

What should I do if there is an arbitration clause?

- a) Try to defeat the arbitration clause
- b) Try to succeed in arbitration

Hint: see NCLC treatise,
*Consumer and Worker
Arbitration Provisions*



Rooftop Solar: Policy and Program Design Recommendations

- **Prioritize free and low-cost programs for low-income consumers.** Financed rooftop solar should not be marketed to low-income customers who can obtain the same measures at little or no cost through local, state or federal programs. Consumers should receive information about rebates, tax credits, and other means of obtaining more affordable access to solar, including community solar.
- **Encourage independent energy audits.** Policymakers should require energy audits—which give homeowners useful information about ways to improve energy efficiency—performed by independent parties with no financial incentive in a potential project. Audits should be conducted prior to contract formation and installation.
- **Written disclosures can help, but are not the whole solution.**
- **Lend based on ability to repay.** Solar programs should verify debt and income and examine the homeowner’s ability to repay the financing or loan. Projected energy savings should not serve as justification for payments above levels otherwise deemed affordable.

Community Solar: An Equitable Alternative? (1 of 2)

What is community solar?

Community solar is defined by the Department of Energy (DOE) as “any solar project or purchasing program, within a geographic area, in which the benefits of a solar project flow to multiple customers such as individuals, businesses, nonprofits, and other groups.”



Community Solar: An Equitable Alternative? (2 of 2)

Why expand community solar to low-income communities?

- Community solar can address the energy affordability crisis and reduce greenhouse gas emissions that contribute to climate change.
- Low-income families lack ability to afford rooftop solar.
- Low-income families are more likely to be renters and therefore do not own a roof on which solar can be installed.
- Low-income households should not be left out of the transition to a clean energy economy.

Community solar is inherently equitable and protective of consumers.

True

False



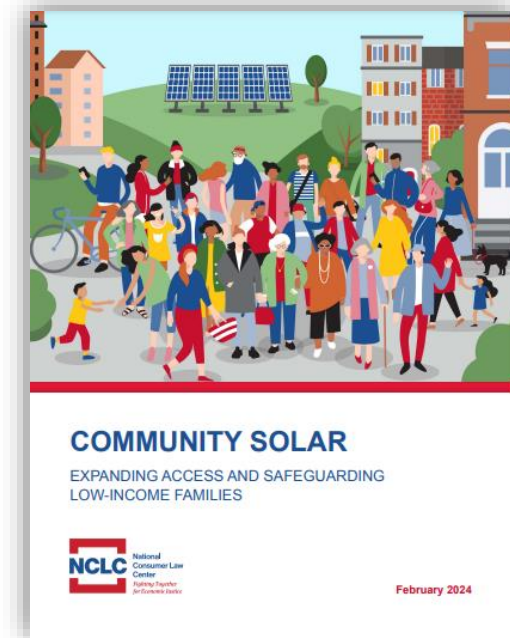
Importance of Robust Consumer Protections

Without robust protections, community solar programs could present significant risks for low-income families:

- Disadvantageous contract terms, including hidden fees and unreasonably long terms;
- Predatory marketing, including lack of contract disclosure;
- Potentially adverse effects on LIHEAP enrollment and utility allowances.

Community Solar: Principles for Consumer Protection

Community Solar: Expanding Access and Safeguarding Low-Income Families looks at existing community solar models, best practices, and state policies and examines DOE's effort to advance community solar through a state-managed low-income subscription software. The report highlights examples of key guardrails to protect low-income subscribers or participants and ensure substantial bill savings.



What are some key protections that would help protect low-income community solar customers?



Models for Protection in Community Solar

After a review of community solar programs around the country, we found the programs with the strongest protections for low-income households adhered to these few broad principles.

General Principles For Protecting Low-Income Community Solar Subscribers

- Meaningful bill savings
- Transparent and reasonable contract terms
- Clear communication in appropriate formats
- No hidden or additional fees
- Accessible complaint mechanism and data disclosure
- Effective evaluation and enforcement process

Models for Protection in Community Solar

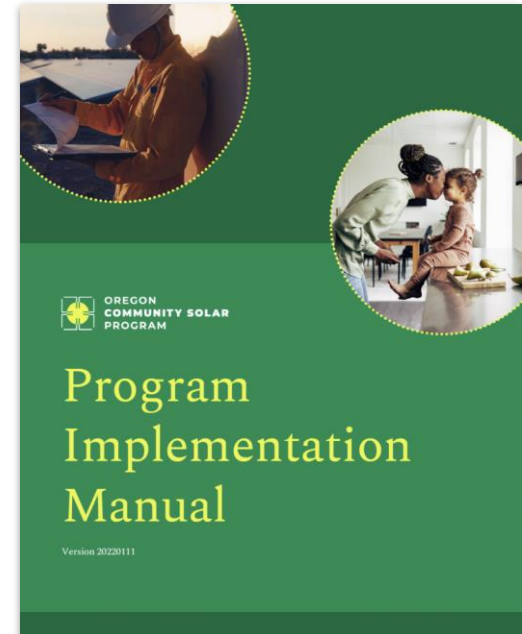
Illinois: Consumer Protection Handbook (Illinois Power Agency)

- The handbook contains language addressing:
 - Unfair and abusive business practices (e.g. “Approved Vendors...shall conduct business affairs with the goal of openness and transparency”)
 - Including prohibited language marketers can use regarding expected bill savings
 - Marketing rules for various channels
 - Required information in disclosure forms

Models for Protection in Community Solar

Oregon: Community Solar Program Implementation Manual

- Monthly cost to participate must not exceed value of bill credits
- No late fees on low-income participants
- No early termination fees for low-income participants
- No adverse impact on a household's LIHEAP benefits



Recommended Consumer Protections (1 of 2)

States should set robust financial, marketing, and compliance requirements for marketers. *Including but not limited to:*

- Ensuring bill savings and providing an exit clause in contracts;
- Prohibiting flat fees, termination fees, late fees, sign-up fees, unreasonably long terms, etc;
- Requiring all documents are available electronically and in paper format before a customer signs;
- Using standardized marketing materials and disclosure forms.

Recommended Consumer Protections (2 of 2)

States should commit to robust oversight, standardization, and coordination with existing low-income programs. Including but not limited to:

- Requiring plain language and concise contracts, forms, and marketing materials;
- Establishing a Code of Practice for marketing, especially for door-to-door sales;
- Developing standardized consumer education materials; develop standardized disclosure forms;
- Creating an accessible complaint process or mechanism.

LIHEAP/WAP Recommendations & Cautions

Coordinate with LIHEAP and WAP to streamline community solar eligibility and enrollment.

- State administrators should develop income eligibility processes that are coordinated and/or streamlined with LIHEAP, WAP, and/or other income-tested programs, including developing methods to determine low-income eligibility for low-income folks not eligible for LIHEAP or WAP.
- State administrators should also ensure program compatibility with low-income energy assistance programs, like LIHEAP and HUD-assisted housing, to avoid adverse impacts on low-income benefits and utility allowances

But we do not support using LIHEAP and WAP funds for solar. Advocates and state administrators should keep in mind that the intended priorities of LIHEAP and WAP are bill assistance, crisis energy-related home repairs, and weatherization...not solar.

Previous Federal Efforts: Solar for All & the IRA (1 of 2)

On Aug. 16, 2022, President Biden signed the [Inflation Reduction Act](#), which provided nearly \$400 billion to support clean energy and address climate change.

- Section 48(e) offered new access to clean energy tax credits with an emphasis on reaching disadvantaged populations and communities with environmental justice concerns.
- The IRA included \$27 billion for the Greenhouse Gas Reduction Fund, including the \$7 billion [Solar for All](#) program.

See IRC Sec. 45D(e) and [IRS Notice 2013-17](#). This provision is pending full guidance.

Previous Federal Efforts: Solar for All & the IRA (1 of 2)

The Solar for All program sought to provide grants to 60 recipients to create new or expand existing low-income solar programs, reaching over 900,000 households in low-income and disadvantaged communities.

- Among other things, the EPA's Greenhouse Gas Reduction Fund Solar for All Program set a goal of delivering an average [bill savings of 20% per household](#).

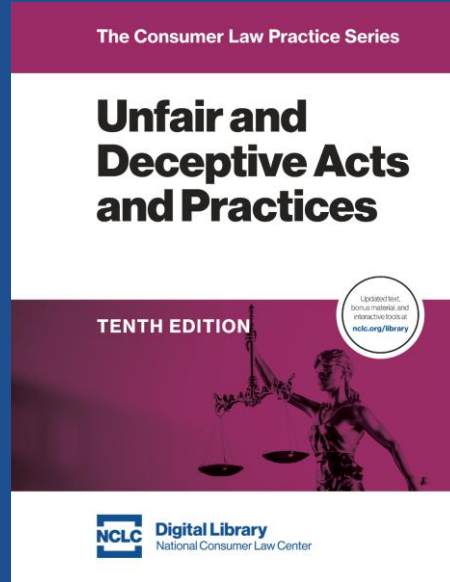
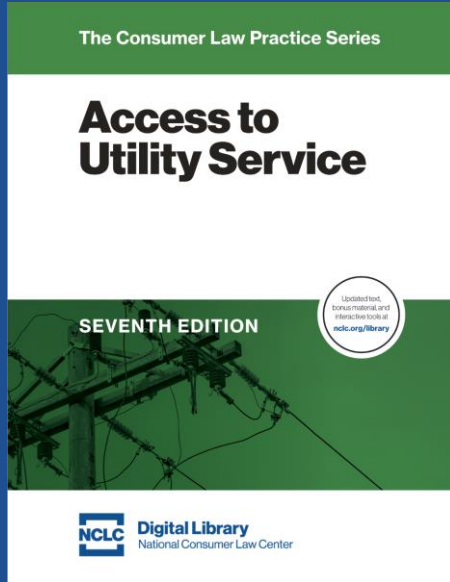
While the 20% savings goal is admirable, it may not be achievable in states that do not have deep subsidies for solar or hard-to-replicate program designs.

Questions?

Continuing the learning...

Check out these resources on solar:

- [Community Solar: Expanding Access and Safeguarding Low-Income Families](#) (NCLC)
- [Rooftop Solar: Consumer Protection Recommendations](#) (NCLC)
- [Clean Energy Connector](#) (DOE)
- [Database of State Incentives for Renewables & Efficiency](#) (DSIRE)
- [Illinois Solar for All](#) (IPA)
- [Massachusetts rooftop solar complaint: *Lara v. Runrun Inc., et al.*](#) (NCLC)



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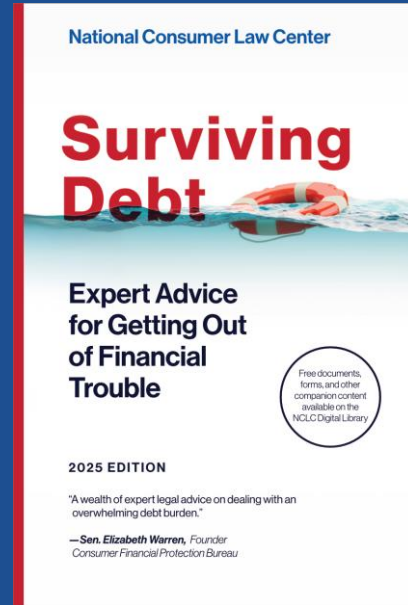
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"NCLC has been the go-to resource on consumer credit, collections, bankruptcy and sales for more than 40 years." —Senator Elizabeth Warren

Contact Information ⁷⁵

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