



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: D.P.U. 24-15 Service List

FROM: Jennifer Keegan, Hearing Officer

RE: Technical Conferences on Self-Attestation, Language Translation, and Website Accessibility

DATE: October 8, 2026

CC: Peter A. Ray, Secretary

I. INTRODUCTION

On June 30, 2026, the Department of Public Utilities (“Department”) issued a Phase II Order in Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers, D.P.U. 24-15-D. In the Phase II Order, the Department directed the methods by which the Commonwealth’s electric distribution companies and gas local distribution companies (“Distribution Companies”) must implement the income-eligible tiered discount rates (“tiered discount rates”). Specifically, the Department required the Distribution Companies to implement self-attestation as a method of enrollment for the Discount Rates, and it directed the Companies to provide translation of marketing materials and increased website access, among other requirements.

On July 20, 2026, the Distribution Companies submitted a Joint Motion for Reconsideration, or in the Alternative, Clarification, D.P.U. 24-15-D. In their Motion, the Distribution Companies objected to three directives in the Phase II Order, D.P.U. 24-15-D: (1) the requirement to translate certain materials on the basis of the Department’s Order in Procedures for Enhancing Public Awareness and Participation in Department Proceedings, D.P.U. 21-50; (2) certain changes to the Distribution Companies’ websites to promote accessibility; and (3) the self-attestation pathway for enrollment in tiered discount rates. Joint Motion at 1, 6, 14.

The Department next issued an Order on September 11, 2026, staying the directives laid out in the Phase II Order on self-attestation, translation, and Americans with Disabilities Act compliance with website format, and referred the issues to a technical conference for resolution. Order on Distribution Companies' Joint Motion for Reconsideration, or in the Alternative, Clarification, D.P.U. 24-15-E (September 11, 2026).

This Hearing Officer Memorandum lays out the questions that will be posed at the technical conferences and sets dates.

II. TECHNICAL SESSION

The technical conferences will be held remotely by Zoom platform on October 16, 2026, and November 12, 2026. Please see the links below for the two technical conferences. If you wish to speak and participate at either technical conference, please RSVP to Kaylee Burgess at Kaylee.Burgess@mass.gov by October 14, 2026, to receive a participant link for the session.

Attendees using the links below will not be participants and will be observers only.

When: **Oct 16, 2026 09:00 AM** and **Nov 12, 2026 09:00 AM**

Topic: DPU 24-15 Tech Sessions

Join from PC, Mac, iPad, or Android:

<https://us06web.zoom.us/j/86479990871>

Join from PC, Mac, iPad, or Android:

<https://us06web.zoom.us/j/86479990871>

Phone one-tap:

+13052241968,,86479990871# US

+13092053325,,86479990871# US

Join via audio:

+1 305 224 1968 US

Webinar ID: 864 7999 0871

The following topics will be discussed during the technical conferences, with the goals of: (1) understanding impediments to tiered discount rates implementation; (2) understanding costs of implementation; (3) problem solving; and (4) discussing realistic timelines for implementation. The first technical conference on October 16, 2026 will address the topic of self-attestation and information needed to ensure a smooth commencement of tiered discount rates by November 1, 2026. The second technical conference on November 12, 2026 will address the topics of translation and website accessibility. The Department intends to take a mid-morning break and a one-hour lunch break around 1:00 p.m. each day.

If the Distribution Companies have additional questions regarding implementation of the tiered discount rates that they would like to discuss at the technical conference, they should be filed in written form with the Hearing Officer by October 13, 2026.

Discussion Topics for October 16, 2026

A. Opening Remarks

B. Self-Attestation

1. Framework: The following outline will guide discussion of how each company envisions a self-attestation framework, including eligibility; the process and timeline for form submission and income verification; and the process for re-enrollment.
2. [National Grid] Please prepare a brief presentation on the Company's current self-attestation pilot approved in D.P.U. 23-150.
3. [All Companies] Please discuss any additional information or guidance required to build a plan for launching self-attestation as a method of enrollment in the tiered discount rates.
4. [All Stakeholders] Please discuss any guidance for the Distribution Companies regarding launching a self-attestation pathway.
5. Potential barriers:
 - a. Discuss a timeline that is technically feasible for the Distribution Companies to implement a self-attestation pathway separate from the ongoing efforts undertaken to comply with D.P.U. 24-15-B and other D.P.U. 24-15-D directives.
 - b. Discuss whether the Distribution Companies may (individually or collectively) seek to hire a vendor for implementation of a self-attestation pathway.
 - c. Discuss any information technology ("IT") or other technical barriers associated with implementing a self-attestation pathway.
 - d. Based on experience in other jurisdictions or discussions with potential vendors, discuss any cost estimates for building a self-attestation pathway as described in D.P.U. 24-15-D.
 - e. Describe the additional training that customer service representatives may require to implement self-attested enrollment and the cost of such training.

- f. Describe any additional barriers to implementation beyond technical feasibility and costs.

6. Enrollment:

- a. Discuss how each Distribution Company envisions its process for enrollment in the discount rate through self-attested income. This enrollment pathway includes enrollment through multiple channels (e.g., online, by phone, paper form by mail).
- b. Discuss any additional capabilities (e.g., linking enrollment forms to customer accounts, and approving applications) that the Distribution Company would need (including IT and/or staff resources) to build to accommodate enrollment.
- c. Discuss how this process may interact with existing discount rate enrollment pathways.

7. Form design:

- a. Describe any technical, cost, or other potential barriers to designing and launching an online self-attestation form that is consistent across Distribution Companies.
- b. Discuss the technical feasibility, costs, and timeline the company anticipates with designing and including an attestation statement on self-attestation forms for customers (e.g., a box for customers to check to certify that the information they have provided is true and correct).

8. Audit and monitoring processes:

- a. Discuss a viable and cost-effective audit process and associated expenses, including whether the Distribution Companies will need third-party expertise to audit customer self-attestations of income, and how many customers the Distribution Companies anticipate would be reasonable to include in an audit.
- b. Discuss the role, if any, that community action agencies (“CAAs”) could play for the audit and monitoring processes, and any associated costs.
- c. Discuss other ways to monitor the performance of a self-attestation program (e.g., number of customers enrolled via self-attestation, amount of time to process a customer’s application, and whether this is done manually or systematically).

9. Re-enrollment period and retroactive billing:

- a. When a customer who is eligible for a tiered discount rate but unable to provide documentation within the currently offered on-demand period is removed from a tiered discount rate, describe how the customer could pursue assistance (e.g., whether the company directs such customers to CAAs) and how soon the customer could attempt to re-apply.
- b. Describe and compare the technical barriers associated with retroactively billing a customer deemed ineligible versus not retroactively billing a customer.
- c. Estimate and compare the costs associated with updating IT systems to retroactively bill a customer removed from the discount rate versus not retroactively billing such a customer.

10. [Distribution Companies] Questions to address before the November 1, 2026 launch of tiered discount rates.

Discussion Topics for November 12, 2026

C. Language Translation

1. Framework: the Department intends for the translation requirements in D.P.U. 24-15-D to allow for a customer with limited English proficiency to access a tiered discount rate by learning information (via webpages/FAQs, embedded web documents, or bill inserts), submitting an application (via application forms), and confirming enrollment (via enrollment confirmation or other follow-up correspondences).
 - a. Please identify any specific items in the above list that warrant particular consideration or clarification.
 - b. Please describe how the Distribution Companies currently pursue translation services for written text in each context, and whether the Distribution Companies expect that translating any identified items will require resources or capabilities beyond those methods.
2. Learning information on the website or via bill inserts:
 - a. [National Grid] Describe the process of implementing the translate feature across all webpages, including cost, timeline, process, and alternatives considered.

- b. [Other Distribution Companies] Describe any progress each Company has made regarding language translation of webpages.
 - c. Describe whether the Distribution Companies intend to use embedded documents on their website to educate customers about the tiered discount rates, and how translated versions might be made available.
 - d. Describe the current approach to translating bill inserts, and whether that approach may continue for bill inserts developed in the future for educating customers on the tiered discount rate.
3. Submitting an application form:
- a. Discuss whether the Distribution Companies expect to encounter any issues with translating the application form for customers to apply for the tiered discount rate.
4. Confirming enrollment via customer-specific direct messaging:
- a. Describe how the Distribution Companies currently deliver customer-specific messages and the general nature of those messages (e.g., disconnection notices, responses to customer inquiries, etc.)
 - b. Describe whether and how the Distribution Companies offer translation of the customer-specific messages identified above.
 - c. Identify all customer-specific messages the Distribution Companies expect to send regarding the tiered discount rate (e.g., enrollment confirmation, applications requiring additional action, rejected applications, etc.) and whether the methods described above may be suitable for translating the customer-specific messages.

D. Webpage Accessibility

- 1. Framework: The Department seeks to ensure that all customers can readily access each Distribution Company's tiered discount rates, tiered discount rates-related webpages, and energy affordability webpage.
- 2. Current state of webpage accessibility:
 - a. Discuss the Distribution Companies' internal policies for web accessibility.
 - b. Describe the accessibility features the Distribution Companies currently implement on their websites (e.g., text alternatives for non-

text content, captions for video content, all functionality is available from a keyboard).

- c. Describe whether these features are consistent across the website or vary by webpage.
- d. For Distribution Companies and/or stakeholders with accessibility features on their websites, describe the resources that were required to implement these features and any ongoing costs to maintain these features (e.g., technical costs, staff resources, engagement with a third-party vendor, etc.).

3. Future state of webpage accessibility:

- a. Discuss any feedback from community members and customers regarding the Distribution Companies' web accessibility.
- b. Describe whether the Distribution Companies follow or plan to follow an established set of accessibility guidelines (e.g., the World Wide Web Consortium's Web Content Accessibility Guidelines ("WCAG"), or the Principles of Universal Design).
- c. Discuss the Distribution Companies' familiarity with WCAG and/or Principles of Universal Design.
- d. Discuss whether the Distribution Companies have conducted any kind of current state, future state, and gap analysis with respect to web accessibility to determine specific abilities that would need to be built in terms of resources, cost, time, and effort for discount rate and energy affordability webpages (e.g., National Grid's Help Making Payments webpage) to follow an established set of accessibility guidelines.
 - 1. Discuss technical feasibility, estimated costs, and feasible timelines for the Distribution Companies to conduct such a current state, future state, and gap analysis.
- e. Discuss whether the Distribution Companies will consider employing additional accessibility features in an iterative manner.
- f. Discuss estimated incremental costs (i.e., technical costs, engagement with a third-party vendor, staff resources) associated with employing WCAG on discount rate and discount rate-related webpages

- g. Discuss a feasible timeline for implementing new accessibility features on tiered discount rates and discount rate-related webpages.

E. [Distribution Companies] Questions to address since launching the tiered discount rates on November 1, 2026.

For any questions about the technical conferences, please contact Jennifer Keegan, Hearing Officer at Jennifer.l.keegan@mass.gov with a copy to Lauren Morris, Hearing Officer, at Lauren.Morris@mass.gov.