



# Elevating the Voice of Customers in Utility and Regulatory Proceedings: How to Do It & Why It is Critical to Ensuring A Path To Energy Affordability

Research & consulting services provided by Hawks Peak Strategies, Inc.  
Sponsored by the Massachusetts Attorney General's Office of Ratepayer Advocacy.

## What We Did

The Massachusetts Attorney General's Office of Ratepayer Advocacy supported qualitative consumer research to elevate the voice of income-qualified utility customers to inform its work in two separate proceedings: D.P.U. 23-150, a recent electric rate case, and D.P.U. 24-15, the Department of Public Utilities' ongoing investigation into energy burden and affordability.

## Why This Matters

- Advocates and decision-makers should understand consumers' lived experiences to craft policy and design solutions that hit the mark.
- There is a risk of wasting limited ratepayer resources if solutions aren't designed from a customer-centric point of view.
- The people you are trying to serve deserve the opportunity to be heard and understood – you must be creative to ensure those voices are included as regulatory proceedings are complex, challenging, and cumbersome to navigate.
- Partnerships between Consumer Advocates and consultants to elevate customer voices can result in new policy and advocacy positions that weren't on the radar.

## Study Goals

- Understand how income-qualified consumers are managing high bills, energy affordability, and prioritizing monthly bills and expenses.
- Understand consumers' awareness of a low-income discount rate ("LIDR") and affordability offerings broadly, as well as identify the pathways that drive consumers to learn about and participate in programs.
- Map customer experiences and barriers to enrollment and participation in the discount rate, LIHEAP, and other affordability offerings.
- Identify opportunities for utilities to better reach and communicate with income-qualified ratepayers.

## Key Insights

**A Constant Juggle.** Nearly all income-qualified consumers whom we interviewed discussed challenges with being able to afford all their bills, including monthly expenses such as housing costs, car payments and car insurance, electric and gas bills, cable television, food, medical expenses, and more. Interviewees expressed a constant need to juggle and prioritize which monthly bills they pay first each month, and which bills they pay in full or pay partially.

**Challenging Housing Conditions and Energy-Limiting Behaviors.** The income-qualified consumers who participated in this study reported experiencing a wide variety of challenging housing issues, from being too cold in the winter months within their homes to being too hot in the summer months, persistent drafts around windows and doors, and pest infestations. To overcome being cold in the winter, interviewees described a host of energy-limiting behaviors, some of which may pose health and safety risks, including leaving gas ovens open to warm spaces.

**LIDR Awareness, Enrollment, and Experiences: Opportunities for Improved Awareness & Participation.** Eight of 12 interviewees reported that they knew about the discount rate offering, yet only 5 were currently participating. The most common barriers to LIDR enrollment and participation are: (1) a lack of awareness about the LIDR offering itself, particularly for those interviewees who are less familiar or experienced with state assistance programs; and (2) a perception that “low-income” does not apply to their household situation

**Marketing, Education, and Outreach Must Meet Consumers Where They Are.** Interviewees described the need for multiple channels of information to ensure they receive the necessary information. Interviewees found many program names and terms confusing and did not understand what those affordability solutions actually offered (i.e., “arrearage management”). Simplifying language and using language in MEO efforts that ratepayers already use is critical to ensuring understanding and accessibility.

## Advocacy Based on Consumer Voices

- Make LIDR enrollment & re-enrollment easier and more convenient for customers.
  - Expanded auto-enrollment through data-sharing & categorial eligibility: DPU approved.
  - Self-attestation pilot to verify LIDR eligibility: DPU ordered a pilot be proposed.
  - Re-certification of income every 2 years instead of every 1 year: pending, D.P.U. 24-15.
- Use terms consumers relate to and understand; avoid legalese.
  - Informally adopted by one utility; pending, D.P.U. 24-15.
- Standardize some program elements, terms, and names; AGO advocacy in arrearage management plan proceeding, D.P.U. AMP-24.

## Contact Us

Courtney Henderson  
Founder, Hawks Peak Strategies  
401-338-0800  
courtney@hawks-peak.com

Jessica Freedman  
Assistant Attorney General, MA AGO  
Jessica.Freedman@mass.gov