August 31, 2026

BY ELECTRONIC DELIVERY

Elizabeth McNamara
Hearing Officer
Massachusetts Department of Public Utilities
One South Station, 3rd Floor
Boston, MA 02110

Re: D.P.U. 26-62, Inquiry by the Department of Public Utilities on its own Motion into the Design and Implementation of Time-Varying Rates.

Dear Hearing Officer McNamara:

Good Energy, L.P. ("Good Energy") appreciates the opportunity to submit comments to the Massachusetts Department of Public Utilities ("DPU" or "Department") in this proceeding regarding the design and implementation of Time-Varying Rates ("TVR"). Good Energy serves as a leading consultant to municipal aggregation programs across Massachusetts and supports approximately 70 cities and towns with regard to regulatory compliance, electricity supply procurement, customer engagement, and long term program planning. TVR represents an opportunity for customers to increase control over their monthly electric bills. By shifting electricity usage to lower-cost, off-peak periods, customers can reduce their monthly bills while also helping to limit the need for additional grid infrastructure investments. Jurisdictions across the country have shown that TVR serves as a practical and modern approach to electric rate design.[1] We commend the Department for advancing this investigation and prioritizing grid modernization investments that benefit both customers and the system across the Commonwealth. Accordingly, Good Energy submits these comments to provide its perspective on the proposed design and implementation of TVR and to identify considerations that we believe are important to the successful implementation of these rates.

<u>Question 1: Consumer Protections</u>

The Department should ensure that Electric Distribution Companies' ("EDCs") schedules to offer TVR for Basic Service supply occur no sooner than the EDCs have completed all necessary improvements to enable third-party suppliers to also offer TVR. Without this fundamental consumer protection, electricity customers of municipal aggregations interested in TVR would have no option but to leave the program. Depending on the aggregation program, leaving the program could mean forfeiting longer-term stability of prices, cleaner energy and potentially additional Low-Income Community Shared Solar discounts.

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[1] Energy and Environmental Economics, Inc. (E3). (2025, February 26). Long-term report. https://www.ethree.com/wp-content/uploads/2025/10/E3-Final-Long-Term-Report-2025-02-26.pdf

Importantly, our statement about equal timing of TVR implementation applies to consolidated billing via the rate ready method. Consolidated billing allows the third-party supplier's charge to appear on the EDC bill, and maintaining a single bill is a very high priority for cities and towns offering municipal aggregation. Consolidated billing also allows the third-party supplier to participate in Purchase of Receivables, which is critical to allowing financial benefits such as budget billing, low-income discounts and net metering credits to be applied to the entire bill (i.e., both delivery and supply). With Rate ready consolidated billing third-party suppliers provide the EDCs the necessary inputs (e.g., per-kWh price) such that the EDCs are able to calculate a supply charge after they have read the meter.

Question 3: Additional AMI and Operational Changes Needed for TVR Supply Rates

The EDCs are set to respond to this same question: "*identification of any additional changes to AMI functionalities, billing systems, or other operational functions to enable TVR supply rates for non-demand customers who receive supply from competitive suppliers or municipal aggregation providers*".

We highlight that such response will need to address the EDCs utilizing AMI interval data to conduct load settlement with ISO-New England, a requirement for third-party supplier TVR that we have articulated in comments in Use of Interval Data Collected by Advanced Metering Infrastructure to Settle Load with ISO New England Inc., D.P.U. 26-44.

Additionally, we have not yet seen discussion of changes needed to the Electronic Data Information (EDI) system to accommodate rate ready TVR with consolidated billing. Based on the EDCs' commitment "to accommodate, as standard rate-ready TVR parameters, up to three daily billing periods with separate options for weekends and holidays" (AMI Stakeholder Final Report, D.P.U. 21-80/81/82), we expect changes to EDI will be needed to allow suppliers to send different prices for different time periods, perhaps to define those time periods, and for EDCs to send to suppliers usage and billed amounts for each of those periods.

Question 4: MEO Plans

In D.P.U. 26-20, Eversource stated that it will communicate directly with customers and is not committing to coordinate with suppliers or municipal aggregators; suppliers and municipal aggregators can access the customer education materials about data sharing and opt-out rights via the Company's Customer Rights bill insert and website (See Advanced Metering Data Access Protocol Implementation Plan, D.P.U. 26-20 Response to DPU-Common 2-4 (2026)). This approach does not provide advanced notice to municipal aggregators if the EDCs plan to communicate about the availability of Basic Service TVR to municipal aggregation customers. Good Energy strongly believes that municipal aggregators should be provided reasonable notice of if and when such communications to our customers will occur. Aggregation programs may act upon this information by preparing postings on municipal and aggregation program websites, sending electronic and mail communications, and holding information sessions, etc. to explain if, how and when the municipal aggregation program will offer its own TVR and how such TVR may compare to the Basic Service offering. In this way, aggregation participants will be empowered with fuller information to evaluate their options for TVR.

Conclusion

Good Energy supports the Department's efforts to advance TVR as an important tool for providing customers with greater control over their electricity costs while supporting a more efficient and flexible electric grid. For TVR to achieve these benefits, however, its implementation should allow at least the same opportunities for customers enrolled in municipal aggregation as those in Basic Service.

Respectfully submitted,

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